

In the Commonwealth Court of Pennsylvania
U.S.A.

James F. Lapinski, pro se
Plaintiff

July 25, 2020

VERSUS

IN Re: SHIP/Conseco, No. 1 SHPJO20

Conseco

Senior Health Insurance Company of Pennsylvania
Teachers Protective Mutual Insurance Company

UPDATED DISCOVERY MOTION BY LAPINSKI'S
FOR MAY 17, 18, 2021 SHIP REHAB HEARINGS

1.) Intervenor James Lapinski motion: the
Court again to accept evidence re deaths,
cases, claims to SHIP-Conseco, etc. overall
with focus on Senior policy holder ages 65 plus.

RECEIVED
COMMONWEALTH COURT
OF PENNSYLVANIA
2021 MAY 19 AM 10:05

James F. Lapinski
INTERVENOR

SHIP REHAB

May 13, 2021

Phone 1-703-362-7795

RECEIVED
COMMONWEALTH COURT
OF PENNSYLVANIA

2021 MAY 19 AM 10:05

In the Commonwealth Court of Pennsylvania

and

May 13, 2021 September 26, 2020

James F. Lapinski Intervenor's witness
Patricia Sue LAPINSKI

VERSUS

Case No. 1 SHIP 2020

Senior Health Insurance Company of Pennsylvania

AMENDED May 13, 2021

DESCRIPTION OF SUBSTANCE OF TESTIMONY OF

PATRICIA SUE LAPINSKI AT 10-20-2020 HEARING

AND EXHIBITS TO BE INTRODUCED OCT. 20, 2020

and witnesses Rose Marie Knight & Georgina PARISI

Many SHIP policyholders have died
in 2020 due to COVID-19, perhaps 95,000 or
more. This obviously reduces the liability at SHIP
of SHIPS 46,000+ policyholders as of 2019
actuarial data. It ~~may~~ results in any
SHIP Rehabilitation Plan ^{NOT} needed at all!

Motion to Court: please order SHIP
to file with the Court the exact number of
deaths, and living policyholders, as of Sept. 30, 2020,
and state the numbers by each insurance company.

Patricia Sue Lapinski hereby motions the Court NOW
to modify the Rehabilitation Plan by updating
the 2019 actuarial data to reflect COVID-19
coronavirus deaths of all 46,000 ± policyholders
as of December 31, 2020 at the latest, ~~no earlier~~
~~than November 1, 2020~~ preferably too 3-31-2021

Alternatively witnesses request the Court
to DENY, strike the current SHIP Plan NOW.

At a minimum NOW Lapinski Requests
the Court DEFER any decisions, actions
until mid-2021 when better VIRUS death
data is available & until the Public is vaccinated.

Per the July 2020 SHIP document, legal
service made Sept. 26, 2020 by U.S.P.S to Cozen O'Connor
and Patrick Cantilo, SDR, in Austin, Texas.

Patricia Sue Lapinski and legal service ~~John H. Lapinski~~
6121 Lundy Place by U.S.P.S Mail MAY 13, 2021
Burke, VA 22015-3432 5-13-2021

Enclosures: Exhibit for Oct. 20, 2020 Hearing: "Application
to Intervene..." dated July 25, 2020