



Filed 11/18/2021 1:23:00 PM Supreme Court Middle District  
71 MAP 2021

faegredrinker.com

**D. Alicia Hickok**  
Partner  
alicia.hickok@faegredrinker.com  
215-988-3364 direct

**Faegre Drinker Biddle & Reath LLP**  
One Logan Square, Suite 2000  
Philadelphia, Pennsylvania 19103  
+1 215 988 2700 main  
+1 215 988 2757 fax

November 18, 2021

**VIA PACFILE**

Amy Dreibelbis, Esq.  
Deputy Prothonotary  
Supreme Court of Pennsylvania  
Middle District  
Pennsylvania Judicial Center  
601 Commonwealth Ave., Suite 4500  
P.O. Box 62575  
Harrisburg, PA 17106

**Re: No. 71 MAP 2021 – In Re: Senior Health Insurance Company of  
Pennsylvania (In Rehabilitation)**

Dear Ms. Dreibelbis:

Please accept this letter response on behalf of our client, the National Organization of Life and Health Insurance Guaranty Associations, which will not be filing an answer in response to the State Insurance Regulators' Application for Stay Pending Appeal.

Very truly yours,

*/s/D. Alicia Hickok*  
D. Alicia Hickok

DAH

cc: Cozen O'Connor (via PACFile and Email to [shipcomments@cozen.com](mailto:shipcomments@cozen.com);  
[rehabilitation@shipltc.com](mailto:rehabilitation@shipltc.com))  
Patrick Cantilo (via PACFile and Email to [service@cb-firm.com](mailto:service@cb-firm.com))  
All counsel of record on the master service list (via PACFile and Email)  
James F. Lapinski (via Regular Mail)  
Georgianna Parisi (via Regular Mail)

## PROOF OF SERVICE

I hereby certify that on this day I caused the foregoing Letter Response to the Jurisdictional Statement on behalf of the National Organization of Life and Health Insurance Guaranty Associations to be served on the Rehabilitator by electronic delivery to the Rehabilitator's counsel and the Special Deputy Rehabilitator at the below addresses.

Cozen O'Connor  
[shipcomments@cozen.com](mailto:shipcomments@cozen.com)  
[rehabilitation@shipltc.com](mailto:rehabilitation@shipltc.com)

Patrick Cantilo  
[service@cb-firm.com](mailto:service@cb-firm.com)

A copy of the foregoing was also served by electronic transmission via PacFile and was served upon the email addresses shown on the master service list available as of the date of filing, and upon the persons admitted as intervenors, with address by U.S. mail on:

James F. Lapinski  
P.O. Box 291395  
Port Orange, FL 32129

Georgianna Parisi  
257 Regency Ridge Drive  
Dayton, OH 45459

Dated: November 18, 2021

/s D. Alicia Hickok  
D. Alicia Hickok

**IN THE SUPREME COURT OF PENNSYLVANIA**

In Re: Senior Health Insurance Company of : 71 MAP 2021  
Pennsylvania (In Rehabilitation) :  
:

Appeal of: The Superintendent of Insurance of the  
State of Maine, The Commissioner of Insurance of  
the Commonwealth of Massachusetts and the  
Insurance Commissioner of the State of Washington

**PROOF OF SERVICE**

I hereby certify that this 18th day of November, 2021, I have served the attached document(s) to the persons on the  
date(s) and in the manner(s) stated below, which service satisfies the requirements of Pa.R.A.P. 121:

**Service**

Served: Acting Chief Counsel Amy Daubert  
Service Method: eService  
Email: adaubert@pa.gov  
Service Date: 11/18/2021  
Address: Pennsylvania Insurance Department  
1341 Strawberry Square  
Harrisburg, PA 17120  
Phone: 717--78-7-2567  
Representing: Appellee Jessica K. Altman, Insurance Commissioner of the Commonwealth of PA  
Appellee Senior Health Insurance Company of Pennsylvania

Served: Dexter Ryan Hamilton  
Service Method: eService  
Email: dhamilton@cozen.com  
Service Date: 11/18/2021  
Address: 1900 Market Street  
Philadelphia, PA 19103  
Phone: 215-665-2166  
Representing: Appellee Jessica K. Altman, Insurance Commissioner of the Commonwealth of PA  
Appellee Senior Health Insurance Company of Pennsylvania

## IN THE SUPREME COURT OF PENNSYLVANIA

### **PROOF OF SERVICE**

*(Continued)*

Served: Georgianna Parisi  
Service Method: First Class Mail  
Service Date: 11/18/2021  
Address: 257 Regency Ridge Dr.  
Dayton, OH 45459  
Phone: 937-305-4191  
Pro Se: Appellee Georgianna Parisi

Served: Haryle Kaldis  
Service Method: eService  
Email: hkaldis@cozen.com  
Service Date: 11/18/2021  
Address: 1650 Market Street  
Suite 2800  
Philadelphia, PA 19103  
Phone: 215-665-5559  
Representing: Appellee Jessica K. Altman, Insurance Commissioner of the Commonwealth of PA  
Appellee Senior Health Insurance Company of Pennsylvania

Served: James F. Lapinski  
Service Method: First Class Mail  
Service Date: 11/18/2021  
Address: PO Box 291395  
Port Orange, FL 32129  
Phone: --  
Pro Se: Appellee James F. Lapinski

Served: James Steven Gkonos  
Service Method: eService  
Email: jgkonos@saul.com  
Service Date: 11/18/2021  
Address: Saul Ewing LLP  
Centre Square West, 1500 Market Street, 38th Floor  
Philadelphia, PA 19102  
Phone: (21-5) -972-8667  
Representing: Appellee Primerica Life Insurance Company

## IN THE SUPREME COURT OF PENNSYLVANIA

### **PROOF OF SERVICE**

*(Continued)*

Served: Jodi A. Frantz  
Service Method: eService  
Email: jodfrantz@pa.gov  
Service Date: 11/18/2021  
Address: 1341 Strawberry Square  
Harrisburg, PA 17120  
Phone: 717-787-2567  
Representing: Appellee Jessica K. Altman, Insurance Commissioner of the Commonwealth of PA  
Appellee Senior Health Insurance Company of Pennsylvania

Served: John P. Lavelle Jr.  
Service Method: eService  
Email: john.lavelle@morganlewis.com  
Service Date: 11/18/2021  
Address: Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103  
Phone: 215-963-4824  
Representing: Appellee Anthem, Inc., et al.

Served: Joseph M. Donley  
Service Method: eService  
Email: jdonley@clarkhill.com  
Service Date: 11/18/2021  
Address: 2001 Market Street  
Suite 2620  
Philadelphia, PA 19103  
Phone: 215--64-0-8525  
Representing: Appellee ACSIA Long Term Care, Inc., et al.

Served: Kathryn McDermott Speaks  
Service Method: eService  
Email: kspeaks@pa.gov  
Service Date: 11/18/2021  
Address: 1341 Strawberry Square  
Harrisburg, PA 17120  
Phone: (71-7) -787-2567  
Representing: Appellee Jessica K. Altman, Insurance Commissioner of the Commonwealth of PA  
Appellee Senior Health Insurance Company of Pennsylvania

## IN THE SUPREME COURT OF PENNSYLVANIA

### **PROOF OF SERVICE**

*(Continued)*

Served: Leslie Miller Greenspan  
Service Method: eService  
Email: lgreenspan@tlgattorneys.com  
Service Date: 11/18/2021  
Address: Tucker Law Group  
1801 Market Street, Suite 2500  
Philadelphia, PA 19103  
Phone: 215-875-0609  
Representing: Appellee Jessica K. Altman, Insurance Commissioner of the Commonwealth of PA  
Appellee Senior Health Insurance Company of Pennsylvania

Served: Michael John Broadbent  
Service Method: eService  
Email: mbroadbent@cozen.com  
Service Date: 11/18/2021  
Address: Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103  
Phone: 215--66-5-4732  
Representing: Appellee Jessica K. Altman, Insurance Commissioner of the Commonwealth of PA  
Appellee Senior Health Insurance Company of Pennsylvania

Served: Patrick Herrera Cantilo  
Service Method: eService  
Email: phcantilo@cb-firm.com  
Service Date: 11/18/2021  
Address: 11401 Century Oaks Terrace  
Suite 300  
Austin, TX 78758  
Phone: 512-478-6000  
Representing: Appellee Jessica K. Altman, Insurance Commissioner of the Commonwealth of PA  
Appellee Senior Health Insurance Company of Pennsylvania

Served: Preston M. Buckman  
Service Method: eService  
Email: pbuckman@pa.gov  
Service Date: 11/18/2021  
Address: 901 North 7th Street, Suite 201  
Harrisburg, PA 17102  
Phone: (71-7) -787-6009  
Representing: Appellee Jessica K. Altman, Insurance Commissioner of the Commonwealth of PA  
Appellee Senior Health Insurance Company of Pennsylvania

IN THE SUPREME COURT OF PENNSYLVANIA

**PROOF OF SERVICE**

*(Continued)*

Served: Scott Brandon Galla  
Service Method: eService  
Email: SCOTTGALLA@GMAIL.COM  
Service Date: 11/18/2021  
Address: 2001 Market Street  
Suite 2620  
PHILADELPHIA, PA 19103  
Phone: 608--34-7-6758  
Representing: Appellee ACSIA Long Term Care, Inc., et al.

Served: Stephen G. Harvey  
Service Method: eService  
Email: steve@steveharveylaw.com  
Service Date: 11/18/2021  
Address: 1880 JFK Blvd  
PA - Pennsylvania  
Philadelphia, PA 19103  
Phone: 215-438-6600  
Representing: Appellant Maine Superintendent of Ins., Massachusetts Commissioner of Ins. and Washington Ins. Cor

**Courtesy Copy**

Served: James Joseph Lawless Jr.  
Service Method: Email  
Email: jim.lawless@butlersnow.com  
Service Date: 11/18/2021  
Address:  
Phone: 610-420-6304  
Representing: Amicus Curiae State Insurance Regulators

**IN THE SUPREME COURT OF PENNSYLVANIA**

/s/ Dorothy Alicia Hickok

*(Signature of Person Serving)*

Person Serving: Hickok, Dorothy Alicia  
Attorney Registration No: 087604  
Law Firm: Faegre Drinker Biddle & Reath LLP  
Address: 1 Logan Sq Ste 2000  
Philadelphia, PA 19103  
Representing: Appellee National Organization of Life and Health Insurance Guaranty Associations