

CERTIFICATE OF SERVICE

I, James J. Kutz, Esquire, hereby state that I have this day caused to be served a true and correct copy of the foregoing document upon the persons and at the addresses below named via the Court's PACFile System and U.S. Mail, First-Class, postage prepaid, as follows, which satisfies the requirements of PA. R.A.P. 121 and 1514(c):

Michael J. Broadbent, Esquire
Dexter R. Hamilton, Esquire
Eric D. Freed, Esquire
Matthew J. Siegel, Esquire
Cozen O'Connor
1650 Market Street, Suite 2800
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Tucker Law Group
Ten Penn Center
1801 Market Street, Suite 2500
Philadelphia, PA 19103

*Counsel for Plaintiff, Jessica K. Altman, Insurance Commissioner of the
Commonwealth of Pennsylvania, as Statutory Rehabilitator of Senior Health
Insurance Company of Pennsylvania*

Paul Lorentz
214 Wellington Parkway
Noblesville, IN 46060
Defendant

Protiviti, Inc.
2884 Sand Hill Road
Menlo Park, CA 94025
Defendant

Barry Staldine
6789 South Foster Branch Court
Pendleton, IN 46064
Defendant

A handwritten signature in black ink, appearing to read "James J. Kutz", written over a horizontal line.

James J. Kutz, Esquire

Date: February 24, 2022

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Jessica K. Altman, Insurance Commissioner
of the Commonwealth of Pennsylvania in
her capacity as the Statutory Rehabilitator
of Senior Health Insurance Company of
Pennsylvania,

Plaintiff,

v.

Brian Wegner, Paul Lorentz, Barry Staldine,
and Protiviti, Inc.

Defendants.

No. 1 SHP 2022

**JOINT STIPULATION TO EXTEND TIME TO
RESPOND TO PLAINTIFF'S COMPLAINT**

Pursuant to Pennsylvania Rules of Appellate Procedure 105 and 106, and Pennsylvania Rule of Civil Procedure 248, Plaintiff Jessica K. Altman, Insurance Commissioner of the Commonwealth of Pennsylvania, in her capacity as the Statutory Rehabilitator of Senior Health Insurance Company of Pennsylvania ("Rehabilitator"), and Defendant Brian Wegner (together with the Rehabilitator, the "Parties"), enter into this Stipulation to Extend Time to Respond to Plaintiff's Complaint. In entering this stipulation, the Parties state:

WHEREAS, on February 4, 2022, Mr. Wegner was personally served with the Complaint filed in this action on January 28, 2022.

WHEREAS, Mr. Wegner's deadline to respond to the Complaint is currently February 24, 2022.

WHEREAS, undersigned counsel for Mr. Wegner was recently retained.

WHEREAS, after conferring about the nature of this action, the Parties have agreed that good cause exists for an extension of Mr. Wegner's deadline to respond to the Complaint.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties represented by undersigned counsel, that the deadline for Mr. Wegner to respond (Answer or otherwise Plead) to Plaintiff's Complaint is extended to **March 31, 2022**. Nothing herein shall preclude the Parties from agreeing to, or seeking Court leave to allow, extensions to the response deadline as circumstances require.

February 24, 2022

By: /s/ Michael Broadbent
Michael J. Broadbent
Dexter R. Hamilton
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Matthew Siegel
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Attorneys for the Rehabilitator

By: /s/ James J. Kutz
James J. Kutz
Erin R. Kawa
POST & SCHELL P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101

Attorneys for Brian Wegner

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

POST & SCHELL, P.C.



BY:

James J. Kutz, Esquire

Supreme Court I.D. # 21589

Erin R. Kawa, Esquire

Supreme Court I.D. # 308302

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Date: February 24, 2022

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