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December 19, 2025

Via PACFile

The Honorable Mary Hannah Leavitt
Pennsylvania Commonwealth Court
Pennsylvania Judicial Center
601 Commonwealth Avenue
Harrisburg, PA 17120

Re: *Humphreys v. Vanbridge, an EPIC Company, et al.*,
Case No. 2 SHP 2022, Pennsylvania Commonwealth Court

Dear Judge Leavitt:

In accordance with Your Honor's Order of September 10, 2025, and Court's Order of December 10, 2025 granting the parties additional time to file this joint status report, the parties jointly submit this status report on the progress of discovery in this matter, among other things.

As explained further below, while the parties have made considerable progress in discovery in many areas since the last report, there is more documentary discovery to be done, as well as depositions. As such, additional time is required to complete discovery. A proposed scheduling order is being filed herewith for the Court's consideration.

Since the parties still hope to bring the matter to a close in 2026 and to keep the parties focused on wrapping up this matter, as the Court will see in the proposed Order, the parties are presently only seeking an additional six weeks for discovery, with all other dates being moved out accordingly. However, some of the depositions the parties anticipate needing are of third-parties, and thus it is difficult to anticipate presently whether there will be any scheduling challenges with those depositions. The parties are committed, nonetheless, to keep this case moving along to resolution as expeditiously as possible and thus seek only a modest extension at this time.

1. Bruckner Charitable Trust, Bruckner Investment Trust, and Roebling Re Ltd.

Upon Plaintiff's Praecipes, this Court entered default judgments on April 6, 2023, against these three defendants who failed to respond to the Complaint. There is no additional information about these Defendants on which to update the Court.

2. Golden Tree

Golden Tree has been dismissed from this case without prejudice. Golden Tree has produced several thousand pages of documents in response to Plaintiff's requests. Plaintiff has reviewed and analyzed those documents and have determined that, while based on the information currently available to Plaintiff, it appears likely the dismissal will ultimately become with prejudice, it is prudent to wait until at least the close of discovery to make that determination.

3. Vanbridge, an EPIC Company

Plaintiff's counsel has completed its review of the successor liability issues with Edgewood and believes Edgewood (Vanbridge, an EPIC Company) is an appropriate and viable defendant in this case. Thus, Plaintiff served merits document requests on Edgewood on December 10, 2025 and Edgewood's responses are due on January 10, 2026. Counsel for Plaintiff and Edgewood have discussed that Edgewood believes it will need an extension of the response deadline, and Plaintiff is prepared to agree to a reasonable extension. At this time, the parties do not believe the Court's assistance will be required on this issue.

4. Vanbridge LLC

This Vanbridge entity claimed not to be a legal entity that is required to respond to the Complaint. Upon our Praecipe, the Court entered a Notice of Default Judgment against Vanbridge LLC on August 28, 2024. There is no further update as to this entity at this time.

5. Dixon Hughes Goodman LLP

Since the prior report, the parties have continued to exchange additional written discovery requests and responses and produced further responsive documents. Plaintiff has produced approximately 87,000 documents to date and is in the process of preparing its last sets of documents for production, which are being produced on a rolling basis (one set will be produced today) and expects to have completed its document production in early January. Based on conversations between counsel, from the remaining set of 1,300 or so documents currently undergoing a second level privilege review, Dixon is concerned that many key, responsive documents will be redacted based on the attorney-client privilege. Based on its review of the documents at issue, Plaintiff does not agree but understands that Dixon will need to review the

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privilege log and redactions prior to reaching that determination, and that discussions of those redactions may be necessary before the parties can proceed to oral discovery.

Plaintiff has also served and supplemented its responses to interrogatories and requests for admissions as requested by Dixon, although it anticipates further supplementation may be required as discovery proceeds, especially from deposition testimony, as some of the matters at issue were the subject of oral conversations.

With respect to the discovery directed to Dixon, to date Dixon has produced approximately 800 documents and has advised Plaintiff that this is likely the majority (if not all) of the documents it has to produce in this case. Plaintiff is reviewing Dixon's written responses and objections to Plaintiff's Second Set of Requests for Production received earlier this week. Dixon's responses and objections to a Third Set of Requests for Production are expected at the end of this month. Based on Dixon's responses and document productions to date, Plaintiff anticipates that it will need to issue follow up written discovery (specifically interrogatories and requests for admissions), at least, prior to commencing depositions, including to investigate further Dixon's document retention policies, among other things.

Finally, as requested by Dixon's counsel, Plaintiff's new counsel reviewed certain arguments made by Dixon's counsel relating to the potential for settlement; however, after reviewing the arguments, settlement prospects seem premature at this time.

In closing, the parties respectfully request that the Court grant their request for an extension of the close of the discovery period by six weeks, to and including April 3, 2026, with the subsequent deadlines and trial being moved out accordingly, as set forth in the proposed Order. The parties also believe that reporting to the Court in 90 days (*i.e.*, March 18, 2026) as presently scheduled, would be appropriate given the proposed extension of the discovery deadline.

Respectfully,



Nicole D. Galli

cc: All Counsel of Record