

STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF BURLEIGH

SOUTH CENTRAL JUDICIAL DISTRICT

Jon Godfread, in his capacity as the
North Dakota Commissioner of
Insurance, and the North Dakota
Insurance Department,

Plaintiffs,

vs.

Jessica K. Altman, as Rehabilitator of
Senior Health Insurance Company of
Pennsylvania, Patrick H. Cantilo, as
Special Deputy Rehabilitator of Senior
Health Insurance Company of
Pennsylvania, and Senior Health
Insurance Company of Pennsylvania in
Rehabilitation,

Defendants.

**NOTICE PURSUANT TO
N.D.C.C. § 26.1-01-03.2**

Civil No. _____

[¶1] You are hereby given notice pursuant to N.D.C.C. § 26.1-01-03.2 that the Commissioner of the North Dakota Insurance Department may bring an action in the district court of Burleigh County to enjoin any acts or practices which are prohibited under Title 26.1 of the North Dakota Century Code. Conduct which the Commissioner will seek to enjoin will include, but not be limited to, conduct implementing a plan of rehabilitation for Senior Health Insurance Company of Pennsylvania in Rehabilitation by communicating changes of premium rates or other policy changes to policyholders in the State of North Dakota without required state regulatory approval.

[¶2] You are further hereby notified that the Commissioner may seek a temporary restraining order against you pursuant to Rule 65(a) of the North Dakota Rules of Civil Procedure.

Dated this 28th day of January, 2022.

State of North Dakota
Wayne Stenehjem
Attorney General

By: /s/ James E. Nicolai
James E. Nicolai
Deputy Solicitor General
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By: /s/ Johnannes (Johnny) Palsgraaf
Johannes (Johnny) Palsgraaf
Special Assistant Attorney General
State Bar ID No. 06631
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Attorneys for Plaintiffs.

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DECLARATION OF SERVICE

Civil No. _____

STATE OF NORTH DAKOTA)
COUNTY OF BURLEIGH) ss.

[¶1] Jolene J. Thiel states under oath as follows:

[¶2] I swear and affirm upon penalty of perjury that the statements made in this Declaration are true and correct.

[¶3] I am of legal age and on January 28, 2022, the following document: NOTICE PURSUANT TO N.D.C.C. § 26.1-01-03.2 was served electronically by emailing a copy to:

Jessica K. Altman at jealtman@pa.gov

Patrick H. Cantilo at phcantilo@cb-firm.com

Bob Robinson at rrobinson@shipltc.com

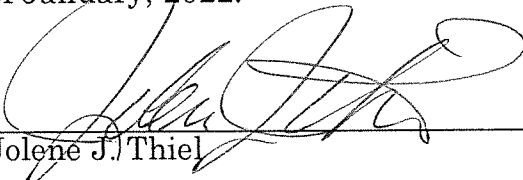
[¶4] I further certify that a copy of the forgoing document, was served upon the following by mailing a true and correct copy thereof to:

Jessica K. Altman
Insurance Commissioner
Pennsylvania Insurance Dept.
1341 Strawberry Square
Harrisburg, PA 17120

Patrick H. Cantilo
Cantilo & Bennett, L.L.P.
11401 Century Oaks Terrace, Suite 300
Austin, Texas 78758

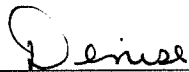
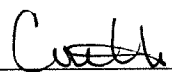
Senior Health Insurance Company of
Pennsylvania (In Rehabilitation)
c/o Bob Robinson
550 Congressional Boulevard, Ste 200
Carmel, IN 46032

and depositing the same, with postage prepaid, in the United States mail at Bismarck, North Dakota, this 28th day of January, 2022.



Jolene J. Thiel

Subscribed and sworn to before me
this 28 day of January, 2022.

Notary Public

