

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	:	DOCKET NO.: 2 SHP 2022
Pennsylvania ("SHIP"),	:	
	:	JURY TRIAL DEMANDED
Plaintiff,	:	
	:	
v.	:	
	:	
Vanbridge, an EPIC Company;	:	
Vanbridge LLC (f/k/a VBR Holdings,	:	
LLC, f/k/a Vanbridge Holdings, LLC);	:	
Roebling Re Ltd.; Dixon Hughes	:	
Goodman, LLP; Golden Tree Asset	:	
Management LP;	:	
Bruckner Charitable Trust; and	:	
Bruckner Investment Trust,	:	
Defendants.	:	

**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 Dixon Hughes Goodman, LLP (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 10, 2022, Dixon Hughes Goodman, LLP was served with the Complaint filed in this action on January 28, 2022.

WHEREAS, Dixon Hughes Goodman, LLP's deadline to respond to the Complaint is currently March 2, 2022.

WHEREAS, undersigned counsel for Dixon Hughes Goodman, LLP was recently retained.

WHEREAS, after conferring about the nature of this action, the Parties have agreed that good cause exists for an extension of Dixon Hughes Goodman, LLP'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 Dixon Hughes Goodman, LLP to respond (Answer or otherwise Plead) to Plaintiff's Complaint is extended to **April 1, 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 28, 2022

By: /s/ Leslie Miller Greenspan
Leslie Miller Greenspan
(PA ID 91639)
TUCKER LAW GROUP
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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*

By: /s/ Joanna J. Cline
Joanna J. Cline
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3000 Two Logan Square
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*Counsel for Defendant Dixon
Hughes Goodman, LLP*

CERTIFICATE OF SERVICE

I, Leslie Miller Greenspan, hereby certify that on February 28, 2022, I caused to be filed the foregoing document through the Court's PACFile system, and that notice was provided to all parties listed on the Master Service List associated with 1 SHP 2020. In addition, I hereby certify that electronic copies of the foregoing document will be posted on SHIP's website at <https://www.shipltc.com/court-documents>.

/s/ Leslie Miller Greenspan
Leslie Miller Greenspan