

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

Michael Humphreys, Acting Insurance	:	
Commissioner of the Commonwealth of	:	
Pennsylvania in her capacity as the	:	
Statutory Rehabilitator of Senior Health	:	
Insurance Company of Pennsylvania	:	DOCKET NO.: 2 SHP 2022
("SHIP"),	:	
	:	JURY TRIAL DEMANDED
Plaintiff,	:	
	:	
v.	:	
	:	
Vanbridge, an EPIC Company; Vanbridge	:	
LLC (f/k/a VBR Holdings, LLC, f/k/a	:	
Vanbridge Holdings, LLC); Roebbling Re	:	
Ltd.; Dixon Hughes Goodman, LLP;	:	
Golden Tree Asset Management LP;	:	
Bruckner Charitable Trust; and	:	
Bruckner Investment Trust,	:	
	:	
Defendants.	:	
	:	

**SECOND AMENDED 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 Michael Humphreys, Acting Insurance Commissioner of the Commonwealth of Pennsylvania, in his capacity as the Statutory Rehabilitator of Senior Health Insurance Company of Pennsylvania ("Rehabilitator"), and Defendant GoldenTree Asset Management LP (GoldenTree) (together with the Rehabilitator, the "Parties"), enter into this Second Amended Joint Stipulation to Extend Time to Respond to Plaintiff's Complaint. In entering this

Second Amended Joint Stipulation, the Parties state that after conferring about the nature of this action, the Parties have agreed that good cause exists for an extension of GoldenTree's deadline to respond to the Complaint and state as follows:

1. The Rehabilitator filed its Complaint in the above captioned matter on January 28, 2022 and served GoldenTree on February 8, 2022.

2. Following discussion between counsel for the Parties, on March 14, 2022 the Parties agreed to and filed a Joint Stipulation extending until March 30, 2022 the time for GoldenTree to file a responsive pleading to the Rehabilitator's Complaint.

3. The Parties subsequently agreed that GoldenTree need not file its responsive pleading until Commonwealth Court acted on an Application filed by the Rehabilitator.

4. The Parties filed an Amended Joint Stipulation on May 5, 2022 providing additional time for GoldenTree to file its responsive pleading to the Rehabilitator's Complaint.

5. Following additional discussion between counsel for the Parties, the Parties hereby file this Second Amended Joint Stipulation modifying the May 5, 2022 Amended Joint Stipulation and agree that the circumstances of this matter

provide good cause for further extension of the time for GoldenTree to file its responsive pleading to the Rehabilitator's Complaint.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties represented by undersigned counsel, that GoldenTree's responsive pleading to the Rehabilitator's Complaint is due not more than 60 days from the filing of this Second Amended Joint Stipulation. Nothing herein shall preclude the Parties from agreeing to, or seeking Court leave to allow extensions to the response deadline as circumstances require.

By: /s/ Leslie Miller Greenspan  
Leslie Miller Greenspan  
(PA ID 91639)  
**TUCKER LAW GROUP**  
Ten Penn Center  
1801 Market Street, Suite 2500  
Philadelphia, PA 19103  
*Counsel for Plaintiff, Michael  
Humphreys, Acting Insurance  
Commissioner of the Commonwealth of  
Pennsylvania, as Statutory  
Rehabilitator of Senior Health  
Insurance Company of Pennsylvania*

By: /s/ Dennis A. Whitaker  
Dennis A. Whitaker  
(PA ID 53975)  
**Hawke McKeon & Sniscak LLP**  
100 North 10th Street  
Harrisburg, PA 17101  
*Counsel for Defendant GoldenTree  
Asset Management LP*

June 21, 2022

## CERTIFICATE OF SERVICE

I, Dennis A. Whitaker, hereby certify that on June 21, 2022, I caused to be filed the foregoing document through the PACFile system, and that notice was provided to all parties listed on the Master Service List associated with 2 SHP 2022.

/s/ Dennis A. Whitaker

Dennis A. Whitaker (PA ID 53975)

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*Counsel for Defendant GoldenTree*

*Asset Management LP*