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June 29, 2026

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 June 29, 2026, the parties jointly submit this status report on the progress of discovery in this matter, among other things.

The parties continue to make progress in discovery and are currently endeavoring to finish discovery, including depositions, by the July 10 deadline. The parties are committed to keep this case moving along to resolution as expeditiously as possible. However, due to scheduling conflicts of counsel and witnesses, the parties respectfully request a two-week extension of the fact discovery deadline, to and including July 24, 2026, in order to allow depositions to complete and for the supplementation of written discovery responses that might be needed, if any, based on those depositions.

The deposition schedule is discussed below. Currently, Plaintiff does not anticipate noticing any depositions other than the three discussed below. As discussed below, Dixon has noticed a corporate representative deposition of SHIP, has requested an individual deposition of one of the witnesses Plaintiff has designated for the SHIP deposition, and has indicated it might have a few other witnesses it wishes to depose depending upon the Plaintiff's corporate representative testimony. Edgewood has not noticed any depositions nor indicated whether it intends to do so.

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 has 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. Edgewood completed its production in response to those requests on May 21, 2026.

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.

On June 9, 2026, Plaintiff served a subpoena on Ken Pierce, a former employee of Vanbridge for a deposition on July 2, 2026 in New York, NY. Counsel for Edgewood has a conflict on that date and thus Mr. Pierce and the parties agreed to hold the deposition on July 14, 2026.

5. Dixon Hughes Goodman LLP

In response to Dixon's discovery requests to Plaintiff, Plaintiff has produced over 100,000 documents, including from other SHIP cases, and including third parties. Plaintiff intends to supplement its responses to certain interrogatories as requested by Dixon prior to the deposition of SHIP, although it also continues to anticipate further supplementation may also be required from deposition testimony.

With respect to the discovery directed to Dixon, to date Dixon has produced approximately 800 documents, with the majority of documents coming from one custodian. Dixon has advised Plaintiff that its document production is complete. Based on Plaintiff's review of Dixon's written

responses and objections and document retention policies produced in early March, Plaintiff believes that Dixon should be in possession of additional responsive documents not yet produced. The parties were unable to resolve Plaintiff's questions pertaining to Dixon's document production and Plaintiff filed its Motion to Compel on June 8, 2026 seeking increased judicial oversight of Dixon's discovery efforts along with evidentiary and monetary sanctions. Dixon disagrees with this position and will file its response to the motion on or before July 8, 2026.

The parties are also engaged in the "meet and confer" process regarding Plaintiff's production of documents with numerous redactions. Upon Dixon's request, Plaintiff produced a privilege log on June 11, 2026 identifying the basis of the privilege it relied upon in the redacted documents. DHG has raised a number of concerns about the log and the parties are conferring. Plaintiff also produced its log of documents entirely withheld on attorney-client privilege grounds from its SHIP-DHG production on June 26, 2026. Dixon is reviewing the log of documents withheld on privilege grounds and confer with Plaintiff regarding issues it has with it, if any. The parties hope to resolve all of the foregoing privilege log issues without Court involvement, but Dixon has indicated that it may need to file a discovery motion on these matters in the near future. Depending upon the results of this process, Dixon may need to seek slight modifications of the Scheduling Order. Plaintiff reserves the right to object to such modifications, if necessary.

With respect to depositions, Plaintiff has served Notices of Deposition for one current Dixon employee, John Roberts, for July 9, 2026 (location TBD), and one former Dixon employee, Brian Steen, on June 29, 2026 (via Zoom). Dixon's counsel has indicated that it will represent Mr. Steen (and of course Mr. Roberts) in his deposition. Mr. Steen's deposition has been confirmed for June 30 via Zoom. Mr. Roberts' deposition has been confirmed for July 17, 2026 in North Carolina in person; however, DHG has advised that Mr. Roberts is receiving medical treatment (necessitating the July 17 date) and may need to push the deposition back into the next week if he is not sufficiently recovered by July 17.

Dixon has served a Notice of Deposition for a corporate designee of SHIP on 39 enumerated topics. Dixon originally noticed the deposition for the week of June 22 to allow time after the deposition to conduct any necessary follow-up discovery; however, Plaintiff's counsel and/or witnesses were not available until July 7 and 8, two weeks after the noticed date. For this reason, as well as the availability of counsel impacting Mr. Pierce's deposition, and Mr. Roberts' health issues pushing his deposition past July 10, the parties agreed to request the extension of the fact discovery deadline from July 10 to and including July 24, 2026, which will not impair the remaining deadlines in the case. Plaintiff has advised DHG that it will oppose any additional depositions that DHG wishes to take if they cannot be completed by the July 24 deadline (which is two weeks after the original date – consistent with DHG's originally proposed timing) and has

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suggested that DHG notice the potential depositions immediately so as to avoid any delays. DHG is coordinating with third party witnesses and intends to send notices for other potential depositions this week.

Regarding the Corporate Representative Notice, Counsel for Plaintiff has served its Objections and Response to the Notice, but has made available two witnesses for this deposition on all topics, Ginger Darrough (currently the CFO of SHIP), on July 7, 2026, and Patrick Cantilo, Esquire, the Special Deputy Rehabilitator of SHIP, on July 8, 2026, in Philadelphia.

Finally, DHG has requested (although not Noticed) that the individual deposition of Ms. Darrough take place at the same time when she is deposed for the SHIP deposition. Plaintiff has agreed to have Ms. Darrough deposed individually the same day as she is deposed for the SHIP deposition, provided that the depositions are segmented into separate sections. DHG is sending an individual notice to this effect..

In closing, the parties have diligently worked to complete discovery by the July 10 deadline, but require a brief extension, to July 24, 2026 to complete depositions and other last minute items. The Parties are preparing to move into expert discovery after the completion of the above discussed fact depositions, consistent with the current Scheduling Order. If the Court desires further status reports, the Parties will provide them.

Respectfully,

A handwritten signature in dark ink, appearing to read "Nicole D. Galli". The signature is fluid and cursive, with the first name "Nicole" and last name "Galli" clearly distinguishable.

Nicole D. Galli

cc: All Counsel of Record