



March 26, 2024

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 January 29, 2024, the parties jointly submit this fifth status report on the progress of discovery on certain threshold issues. Discovery on the threshold issues is continuing, and the parties are involved in ongoing discussions about discovery and potential settlement. Each party is addressed below.

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 thousands of pages of documents in response to Plaintiff's requests. We continue reviewing and analyzing those documents and assessing whether we need additional information from Golden Tree before making a determination of whether to dismiss them from the case with prejudice.

3. Vanbridge, an EPIC Company

Plaintiff served Interrogatories and Requests for Documents on the entity named in the Complaint as "Vanbridge, an EPIC Company" in connection with issues of successor liability. The parties negotiated the terms of a confidentiality agreement and protective order to facilitate the exchange of discovery, and Plaintiff filed an Unopposed

Application for Confidentiality Agreement and Protective Order on October 27, 2023. The Court granted the unopposed application on November 8, 2023. Counsel for Edgewood Partners Insurance Center, Inc. d/b/a Vanbridge, an EPIC company ("Edgewood") produced approximately 320 pages of documents on November 14, 2023, which was supplemented on February 5, 2024. The parties will continue to work through the successor liability issues with Edgewood and make a final determination on whether Edgewood is an appropriate and viable defendant in this case.

4. Vanbridge LLC

This Vanbridge entity claims not to be a legal entity that is required to respond to the Complaint. We continue to assess whether that is accurate or whether a challenge to its certificate of cancellation is warranted so as to proceed against this entity. To make this determination, we have made further factual inquiries of this defendant and await a response.

5. Dixon Hughes Goodman LLP

The parties have exchanged documents. The Rehabilitator has determined that Dixon Hughes Goodman, now Forvis, shall remain as a defendant in this case at this time. The parties are discussing whether an early resolution is possible or whether the parties will proceed with discovery. Defendant Dixon Hughes did not agree to the entirety of this portion of the report and may be making its own supplemental submission.

As the Court can see, we have made progress with respect to sorting out threshold issues with the respective defendants, but additional time is required to complete this process. Therefore, we respectfully request additional time to work through these threshold issues and the ability to submit another joint status report in 60 days.

Respectfully yours,



Leslie Miller Greenspan

cc: All Counsel of Record

CERTIFICATE OF SERVICE

I, Leslie Miller Greenspan, hereby certify that on March 26, 2024, 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 2 SHP 2022. In addition, I hereby certify that electronic copies of the foregoing documents will be posted on SHIP's website at <https://www.shipltc.com/court-documents>.

/s/ Leslie Miller Greenspan
Leslie Miller Greenspan