

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Michael Humphries, Acting Insurance
Commissioner of the Commonwealth
of Pennsylvania in her capacity as the
Statutory Rehabilitator of Senior
Health Insurance Company of
Pennsylvania (“SHIP”),

Plaintiff,

v.

Vanbridge, an EPIC Company, et al.,

Defendants.

DOCKET NO. 2 SHP 2022

ORDER

AND NOW, this ____ day of _____, 2026, upon consideration of the Application of Dixon Hughes Goodman LLP to File Under Seal its Response to the Motion of the Rehabilitator to Compel Discovery and for Sanctions (the “Response”), it is hereby ORDERED that said Application is GRANTED and that the Response and the exhibits appended thereto, which are being submitted contemporaneously with this Application, shall be filed under seal.

BY THE COURT:

MARY HANNAH LEAVITT
President Judge Emerita

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Michael Humphries, Acting Insurance
Commissioner of the Commonwealth
of Pennsylvania in her capacity as the
Statutory Rehabilitator of Senior
Health Insurance Company of
Pennsylvania (“SHIP”),

Plaintiff,

v.

Vanbridge, an EPIC Company, et al.,

Defendants.

DOCKET NO. 2 SHP 2022

**APPLICATION TO FILE UNDER SEAL THE RESPONSE TO THE
MOTION OF THE REHABILITATOR TO COMPEL DISCOVERY AND
FOR SANCTIONS**

Pursuant to the applicable procedural rules, including Pennsylvania Rules of Appellate Procedure 106 and 123, Defendant Dixon Hughes Goodman LLP, respectfully submits this Application to File Under Seal its Response to the Motion of the Rehabilitator to Compel Discovery and for Sanctions (the “Response”) and avers as follows:

1. By Order dated September 5, 2024, this Court approved the Unopposed Application for Confidentiality Agreement and Protective Order (the “Protective Order”), which governs treatment of confidential treatment of documents in this matter.

2. Paragraph 20 of the Protective Order requires, among other things, that certain materials designated as Confidential during discovery in this matter be filed under seal in accordance with the applicable rules.

3. On June 8, 2026, the Rehabilitator filed a Motion to Compel Discovery and for Sanctions against Dixon Hughes Goodman LLP.

4. The parties stipulated that Dixon Hughes Goodman LLP would have until July 8, 2026, to file its Response.

5. The Response, submitted contemporaneously with this Application, discusses certain documents exchanged during discovery which have been designated as Confidential under the Protective Order.

6. Those Confidential exhibits are also appended to the Response.

7. Pursuant to the Protective Order, Dixon Hughes Goodman LLP now files this application to have the Response and the appended Confidential exhibits be filed under seal.

8. While court records are presumptively available to the public, that right is not absolute. *See, e.g., In re M.B.*, 819 A.2d 59, 62 (Pa. Super. 2003).

9. The “decision as to public access must rest in the sound discretion” of the court in which materials are filed. *See Commonwealth v. Frattarola*, 485 A.2d 1147, 1155 (Pa. Super. 1984).

10. Among other reasons, a court may seal records to protect private interests when the interest in secrecy outweighs the presumption of openness. *See, e.g., M.B.*, 819 A.2d at 62-63.

11. The Response and the Confidential exhibits appended thereto address private business dealings, not matters of public interest.

12. Dixon Hughes Goodman LLP believes there is good cause to keep these Confidential materials and discussion of them in the Response private and under seal.

WHEREFORE, Dixon Hughes Goodman LLP respectfully requests that the Court grant the Application to File Under Seal its Response to the Motion of the Rehabilitator to Compel Discovery and for Sanctions, along with the exhibits appended to that Response.

Dated: July 8, 2026

Respectfully submitted,

/s/ Brian Callaway

Joanna J. Cline

Brian H. Callaway

Troutman Pepper Locke LLP

3000 Two Logan Square

Eighteenth and Arch Streets

Philadelphia, PA 19103-2799

Joanna.Cline@Troutman.com

Brian.Callaway@Troutman.com

Phone: 215.981.4000

*Attorneys for Defendant Dixon Hughes Goodman
LLP*

Pro Hac Vice Applications Filed:

Brian Fries

Lathrop GPM LLP

7300 W. 110th Street, Suite 150

Overland Park, KS 66210

Phone: 913.451.5100

brian.fries@lathropgpm.com

Kate O'Hara Gasper

Lathrop GPM LLP

2345 Grand Boulevard, Suite 2200

Kansas City, MO 64108-2618

Phone: 816.292.2000

kate.gasper@lathropgpm.com

Shoshanah M. Shanes

Lathrop GPM LLP

190 Carondelet Plaza, Suite 1400

Clayton, MO 63105

Phone: 314.613.2800

Shoshanah.shanes@lathropgpm.com

CERTIFICATE OF SERVICE

I, Brian H. Callaway, hereby certify that the foregoing was served upon all counsel of record via ECF notification and first-class mail.

/s/ Brian Callaway _____
Brian Callaway

CERTIFICATE OF COMPLIANCE

Pursuant to Pennsylvania Rule of Appellate Procedure 127, I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

/s/ Brian Callaway _____
Brian Callaway