

MARY HANNAH LEAVITT  
Presiding Judge Emerita

Michael Humphreys, Acting Insurance  
Commissioner of the Commonwealth of  
Pennsylvania in his capacity as the  
Statutory Rehabilitator of Senior Health  
Insurance Company of Pennsylvania,  
  
Plaintiff,  
  
v.  
  
Vanbridge, an EPIC Company, at al.,  
  
Defendants.

Nicole D. Galli, as attorney for Plaintiff Michael Humphreys, Acting Insurance Commissioner of the Commonwealth of Pennsylvania in his capacity as the Statutory Rehabilitation of Senior Health Insurance Company of Pennsylvania, respectfully moves this Court for an Order admitting Deanne K. Cevasco of the law firm ND Galli Law LLC to practice before the Court, *pro hac vice*, pursuant to Rule 301 of the Pennsylvania Bar Admission Rules and Pennsylvania Rule of Civil Procedure 1012.1, and sets forth as follows:

- 1

One Liberty Place, 1650 Market Street Suite 3600, Philadelphia, Pennsylvania 19103.

2. Deanne K. Cevasco is Of Counsel at ND Galli Law LLC and is resident in the firm's New York office, located at 136 Madison Ave., 6<sup>th</sup> Floor, New York, New York 10016.

3. Ms. Cevasco is a member in good standing of the bar of New York, before which she was admitted to practice on November 18, 2013, and the bar of California, before which she was admitted to practice on December 4, 2007.

4. Ms. Cevasco is admitted to practice before the following courts:

- U.S. Supreme Court
- U.S. Court of Appeals for the Second Circuit
- U.S. Court of Appeals for the Third Circuit
- U.S. Court of Appeals for the Federal Circuit
- U.S. District Court for the Eastern District of California
- U.S. District Court for the Northern District of California
- U.S. District Court for the Southern District of California
- U.S. District Court for the Southern District of New York
- U.S. District Court for the Eastern District of Michigan

5. Ms. Cevasco has never been reprimanded, suspended, or disbarred and is not subject to any disciplinary proceedings.

6. Ms. Cevasco has been retained as counsel for Michael Humphreys, Acting Insurance Commissioner of the Commonwealth of Pennsylvania in his capacity as the Statutory Rehabilitation of Senior Health Insurance Company of

Pennsylvania, and is familiar with the facts and circumstances of the above-captioned litigation.

7. Ms. Cevasco will comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania and the Pennsylvania Rules of Professional Conduct.

8. Ms. Cevasco shall submit to the jurisdiction of the Courts of Pennsylvania and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during her appearance in the above-captioned matter.

9. Ms. Cevasco has consented to the appointment of Nicole D. Galli as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of her practice of law in the above-captioned matter.

10. Ms. Galli has conducted a reasonable investigation and believes Ms. Cevasco to be a reputable and competent attorney.

11. A true and correct copy of a Verification signed by Ms. Galli is attached as Exhibit A.

12. A true and correct copy of a Verification signed by Ms. Cevasco is attached as Exhibit B.

13. Ms. Cevasco's fee payment certification and completed form for admission *pro hac vice* have been submitted to the Pennsylvania IOLTA Board. See Exhibit C.

WHEREFORE, for all of these reasons, Nicole D. Galli, as attorney for Plaintiff Michael Humphreys, Acting Insurance Commissioner of the Commonwealth of Pennsylvania in his capacity as the Statutory Rehabilitation of Senior Health Insurance Company of Pennsylvania, respectfully requests that Ms. Cevasco be admitted to practice before this Court *pro hac vice* for all proceedings in connection with the above-captioned matter.

Dated: August 18, 2025



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Nicole D. Galli (PA ID 78420)  
One Liberty Place  
1650 Market Street Suite 3600  
Philadelphia, PA 19103  
Telephone: (215) 525-9580  
Facsimile: (215) 525-9585  
ndgalli@ndgallilaw.com

*Counsel for Plaintiff Michael  
Humphreys, Acting Insurance  
Commissioner of the Commonwealth of  
Pennsylvania, in his capacity as  
statutory Rehabilitator of Senior  
Health Insurance Company of  
Pennsylvania*

## **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 Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

A handwritten signature in dark ink, appearing to read "Nicole D. Galli", written over a horizontal line.

Nicole D. Galli

# Exhibit A

Michael Humphreys, Acting Insurance  
Commissioner of the Commonwealth of  
Pennsylvania in his capacity as the  
Statutory Rehabilitator of Senior Health  
Insurance Company of Pennsylvania,  
  
Plaintiff,  
  
v.  
  
Vanbridge, an EPIC Company, at al.,  
  
Defendants.

I, Nicole D. Galli, verify and say that the following facts are true and correct to the best of my knowledge, information, and belief:

1. I am an attorney and managing member of the law firm ND Galli Law LLC, counsel for Michael Humphreys, Acting Insurance Commissioner of the Commonwealth of Pennsylvania in his capacity as the Statutory Rehabilitation of Senior Health Insurance Company of Pennsylvania.

2. I am admitted to the Bar of the Commonwealth of Pennsylvania, and I am an active member in good standing. My Pennsylvania attorney identification number is 78420.

3. I have never been disbarred or suspended from practice by any court, state or federal.

4. There is not now, nor has there ever been, any disciplinary proceeding pending against me as a member of the bar in any jurisdiction.

5. I am not currently sponsoring the admission *pro hac vice* of any other candidates in any case before any court of record in the Commonwealth of Pennsylvania.

6. After a reasonable investigation, I reasonably believe Deanne K. Cevasco of the law firm ND Galli Law LLC to be a reputable and competent attorney, and I am in a position to recommend her admission *pro hac vice* in the above-captioned action.

7. The proceeds from a settlement of the above-captioned action, if any, will be received, held, distributed, and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

8. I consent to my appointment as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of Ms. Cevasco's practice in the above-captioned matter.

I, Nicole D. Galli, verify that the foregoing is true and correct to the best of my knowledge, information, and belief. This Verification is made subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

Dated: August 18, 2025

A handwritten signature in cursive script, reading "Nicole D. Galli", is positioned above a horizontal line.

Nicole D. Galli (PA ID 78420)  
One Liberty Place  
1650 Market Street Suite 3600  
Philadelphia, PA 19103  
Telephone: (215) 525-9580  
Facsimile: (215) 525-9585  
ndgalli@ndgallilaw.com

*Counsel for Plaintiff Michael  
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Nicole D. Galli

## Exhibit B

Michael Humphreys, Acting Insurance  
Commissioner of the Commonwealth of  
Pennsylvania in his capacity as the  
Statutory Rehabilitator of Senior Health  
Insurance Company of Pennsylvania,  
  
Plaintiff,  
  
v.  
  
Vanbridge, an EPIC Company, at al.,  
  
Defendants.

I, Deanne K. Cevalco, verify and say that the following facts are true and correct to the best of my knowledge, information, and belief:

1. I am Of Counsel at the law firm ND Galli Law LLC, located at 136 Madison Avenue, 6<sup>th</sup> Floor, New York, New York 10016.
2. I am a member in good standing of the bar of the State of New York, having been admitted there on November 18, 2013; and I am a member in good standing of the bar of the State of California having been admitted there on December 4, 2007. My New York bar number is 5181367, and my California bar number is 252576.
3. I am also admitted to practice before the following courts:

U.S. Supreme Court  
U.S. Court of Appeals for the Second Circuit  
U.S. Court of Appeals for the Third Circuit  
U.S. Court of Appeals for the Federal Circuit  
U.S. District Court for the Eastern District of California  
U.S. District Court for the Northern District of California  
U.S. District Court for the Southern District of California  
U.S. District Court for the Southern District of New York  
U.S. District Court for the Eastern District of Michigan

4. I have never been disbarred or suspended from practice by any court, state or federal.

5. There is not now, nor has there ever been, any disciplinary proceeding pending against me as a member of the bar in any jurisdiction.

6. There are no pending actions in any Pennsylvania court in which I have applied to *pro hac vice* admission, nor have I ever been denied *pro hac vice* admission in any Pennsylvania court.

7. I affirm that I will comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

8. I affirm that I will submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to any acts or omissions occurring during the appearance in this matter for which my *pro hac vice* admission is sought.

9. I affirm that I have consented to the appointment of Nicole D. Galli, Esq., of the law firm ND Galli Law LLC as sponsor for my *pro hac vice* admission and as agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of the practice of law in this matter for which my *pro hac vice* admission is sought.

10. I am associated in this litigation with the law firm ND Galli Law LLC, and I will participate as part of that firm in the representation of Michael Humphreys, Acting Insurance Commissioner of the Commonwealth of Pennsylvania in his capacity as the Statutory Rehabilitation of Senior Health Insurance Company of Pennsylvania, in this matter.

I, Deanne K. Cevasco, verify that the foregoing is true and correct to the best of my knowledge, information, and belief. This Verification is made subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

Dated: August 18, 2025

A handwritten signature in black ink, appearing to read "Deanne Cevasco", with a horizontal line drawn underneath the signature.

Deanne K. Cevasco  
ND GALLI LAW LLC  
136 Madison Ave., 6<sup>th</sup> Floor  
New York, New York 10016  
Telephone: (646) 680-9662  
Facsimile: (215) 525-9585  
dcevasco@ndgallilaw.com

## Exhibit C



SUPREME COURT OF PENNSYLVANIA  
PENNSYLVANIA INTEREST ON  
LAWYERS TRUST ACCOUNT BOARD

August 14, 2025

DEANNE CEVASCO, Esq.  
ND GALLI LAW LLC  
136 MADISON AVE. 6TH FLOOR  
NEW YORK, NY 10016

SENT TO ANDREW J. COSTA VIA Email: AJCOSTA@NDGALLILAW.COM

Dear Attorney CEVASCO:

This letter serves as the fee payment certification referenced in 204 Pa Code §81.503 and acknowledges receipt of the \$375.00 fee paid by Online Payment on this date related to your pursuit for admission *pro hac vice* in the case identified as Humphreys, v. Vanbridge et al. , no. 2 SHP 2022, filed in the Commonwealth Court of Pennsylvania.

You should refer to Pa Rule of Civil Procedure 1012.1, local court rules, and other regulations of 204 Pa Code §81.501 et. seq. concerning additional requirements related to seeking *pro hac vice* admission.

Sincerely,

A handwritten signature in blue ink that reads "Stephanie S. Libhart".

Stephanie S. Libhart  
Executive Director

cc: NICOLE DOMINIQUE GALLI, Esq.

ndgalli@ndgallilaw.com

Pennsylvania Judicial Center  
601 Commonwealth Ave., Ste. 2400  
PO Box 62445, Harrisburg, PA 17106-2445  
717/238-2001 · 888/PA-IOLTA (724-6582) · 717/238-2003 FAX  
paiolta@pacourts.us · www.paiolta.org

Administering Pennsylvania's Interest On Lawyers Trust Account (IOLTA) Program

Michael Humphreys, Acting Insurance  
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Defendants.

Nicole D. Galli, as attorney for Plaintiff Michael Humphreys, Acting Insurance Commissioner of the Commonwealth of Pennsylvania in his capacity as the Statutory Rehabilitation of Senior Health Insurance Company of Pennsylvania, submits this memorandum of law in support of her motion for *pro hac vice* admission of Deanne K. Cevasco.

This motion is made pursuant to Pennsylvania Bar Admission Rule 301. In relevant part, Rule 301 states:

[a]n attorney, barrister or advocate who is qualified to practice in the courts of another state or of any foreign jurisdiction may be specially admitted to the bar of this Commonwealth for purposes limited to a particular matter.

Pa. Bar Adm. R. No. 301. *Pro hac vice* admission is authorized upon motion of a member of the Bar of this Commonwealth. Nicole D. Galli is a member of the Pennsylvania Bar in good standing and moves for the admission of Ms. Cevasco. *Pro hac vice* admission is therefore authorized pursuant to Rule 301.

In addition, Pennsylvania Rule 1012.1 of Civil Procedure states that the “court shall grant the motion unless the court, in its discretion, finds good cause for denial.” Pa. R. Civ. P. 1012.1(e). Here, all such procedural requirements have been met and there is no good cause for denial of the motion. Verified statements are attached as Exhibits A and B to the Motion in compliance with Pa. R. Civ. P. 1012.1(c) and (d).

WHEREFORE, Nicole D. Galli, as attorney for Michael Humphreys, Acting Insurance Commissioner of the Commonwealth of Pennsylvania, in his capacity as statutory Rehabilitator of Senior Health Insurance Company of Pennsylvania, respectfully requests that the Court grant her Motion and admit Deanne K. Cevasco to practice, *pro hac vice*, for all proceedings in connection with this matter.

Dated: August 18, 2025



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