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August 25, 2025

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 9, 2025, the parties jointly submit this twelfth status report on the progress of discovery in this matter, among other things. Discovery is continuing, and the parties are involved in ongoing discussions about discovery and potential settlement. Each party is addressed below.

As a preliminary matter, the undersigned and my colleagues at ND Galli Law LLC recently took over as counsel for Plaintiff in this matter from Leslie Miller Greenspan and her colleagues at the Tucker Law Group. We are in the process of getting up to speed in the matter and working collaboratively with opposing counsel in doing so.

To that end, counsel for Dixon Hughes and the undersigned have collaborated on a proposed revised Case Management Order for the Court's consideration, which is attached herewith. This schedule will allow Plaintiff's counsel to address a variety of outstanding discovery matters that were put on hold due to the counsel transition and then move forward expeditiously with the remainder of the case.

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. As part of our team's transition into this matter, we anticipate reviewing and analyzing those documents and assessing whether Plaintiff needs 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. Once Plaintiff's counsel is fully up to speed on this matter, we will return to working 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 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. There is no further update as to this entity at this time.

5. Dixon Hughes Goodman LLP

The parties have exchanged written discovery requests and responses and produced some responsive documents. The parties are addressing discovery deficiencies identified to date and serving supplemental requests as needed. The Rehabilitator has determined that Dixon Hughes Goodman, now Forvis, shall remain as a defendant in this case at this time. The Court entered an unopposed Confidentiality Agreement and Protective Order on September 5, 2024. The parties are proceeding with discovery and continuing settlement discussions. As noted, counsel have collaborated on and enclosed is a proposed Case Management Order for the Court's consideration.

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Given the change in counsel for Plaintiff, in particular, as well as the need to resolve certain outstanding discovery matters, complete the balance of discovery (including the production of additional documents and depositions), and continue settlement discussions, among other things, additional time is required to move this case forward to trial. Therefore, we respectfully request additional time as outlined in the proposed Case Management Order propose that the parties submit another joint status report in 90 days.

Respectfully,

A handwritten signature in cursive script, appearing to read "Nicole D. Galli".

Nicole D. Galli

cc: All Counsel of Record