

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

MICHAEL HUMPHREYS, 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, et
al.,

Defendants.

No. 2 SHP 2022

**[PROPOSED] ORDER APPOINTING LINEAL SERVICES, LLC AS
FORENSIC eDISCOVERY NEUTRAL**

WHEREAS, on June 8, 2026, Plaintiff Michael Humphreys, Insurance Commissioner of the Commonwealth of Pennsylvania, as Rehabilitator of Senior Health Insurance Company of Pennsylvania (“SHIP” or “Plaintiff”) filed a motion to Compel Discovery and For Sanctions (the “Motion”) against Defendant Dixon Hughes Goodman LLP (“Dixon” or “Defendant”);

WHEREAS, the Court heard argument on the Motion on August 19, 2026, and based upon the argument and parties’ representations to the Court, directed the

parties to meet and confer to identify a consultant for a forensic search of the electronic records of Defendant and set the parameters for the search;

THEREFORE, it is STIPULATED by the parties and ORDERED by the Court as follows:

1. The parties have agreed to engage the services of Lineal Services, LLC as the Forensic eDiscovery Neutral to perform the following services with respect to custodial mailboxes in an independent neutral fashion in compliance with accepted industry standards, and as either collectively agreed to by the parties or as directed by this Court:

- a. Lineal shall collect full custodian mailboxes, including modern attachments, from Defendant's Microsoft 365 and other available email systems using industry-standard procedures. The specific mailbox custodians shall be agreed upon by Lathrop GPM and ND Galli Law LLC or otherwise ordered by the Court and provided to Lineal. Lineal shall provide information regarding the process of its forensic data collection to both Lathrop GPM and ND Galli Law LLC; the substantive collection (i.e., the actual emails, and any attached spreadsheets or materials) shall not be shared at the collection stage.
- b. Lineal shall extract text and metadata from the collected emails and attached documents, perform deduplication, and prepare the data for

search term filtering. The metadata extraction shall be sufficient to comply with the parties' agreed metadata and production requirements, unless otherwise agreed by the parties or ordered by the Court.

- c. Search Term Filtering and Reporting. Lineal shall use search terms and date ranges agreed upon by the parties or ordered by the Court to run searches across the data in the Relativity One eDiscovery platform.

Lineal shall provide both Lathrop GPM and ND Galli Law LLC with Search Term Reports ("STRs") that include term hit counts, and such STRs shall be shared with both firms. Lineal shall revise and rerun search term iterations only if agreed to by both parties or ordered by the Court.

- d. Substantive data extracted and in Lineal's possession (e.g., emails and attached spreadsheets or other documents, and corresponding metadata) may be provided to Lathrop GPM for the purposes of review. Lathrop GPM shall not destroy or dispose of such materials before the conclusion of this case, including all appeals. Lineal shall not produce or provide any of the substantive data it collects to ND Galli Law LLC.

2. The services described in this Order shall be performed by Lineal's Forensics team and coordinated by a project team that does not manage, and is not involved in, the Lathrop GPM eDiscovery relationship (the "Lineal Neutral

Team”). Lineal shall host the data in a Relativity One database outside of any Lathrop GPM dedicated hosting environment, and the Lineal Neutral Team shall be walled off from any Lathrop GPM dedicated project management team.

3. Lineal’s engagement is currently limited to the services set forth in this Order, although the parties have advised the Court that they are still in discussions about whether and to what extent, if any, additional file repositories should be collected and searched. No further work shall be performed absent an agreed-upon new or revised scope of work, or further order of this Court.

ND GALLI LAW LLC

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It is so ORDERED.

DATED this _____ day of _____, 2026.

BY THE COURT:

MARY HANNAH LEAVITT
President Judge Emerita