



NICOLE D. GALLI
One Liberty Place
1650 Market Street
Suite 3600
Philadelphia, PA 19103
(215) 525-9583 direct
(215) 525-9585 fax
ndgalli@ndgallilaw.com

October 6, 2026

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:

The Rehabilitator and Dixon Hughes Goodman LLP (“DHG”) write to report on the status of the parties’ discussions pertaining to the Court’s Order from the August 19 hearing, and the parties’ October 1 Status Report.

The parties have agreed that DHG shall begin review of search term positive hits (family inclusive) of an agreed upon list of search terms for the first four custodians. DHG noted on Monday, October 5, that certain agreed upon search terms were omitted from the original reports run by Lineal and is having the additional terms run against the four primary custodians. Once these updated reports are provided by Lineal, the parties have agreed that the agreed-upon data set to be reviewed from the first four custodians shall be transferred to DHG for review.

The parties have also agreed that Lineal should begin collection of the second wave of documents from the next six custodians, for the time frame of January 1, 2016 through December 31, 2020, and those collections are underway. The parties continue to evaluate the scope of the searches to be run on the second group of custodians.

The parties will submit the next joint report on their progress by Friday, October 9, 2026.

Respectfully,

Nicole D. Galli

cc: All Counsel of Record