

**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**

**ORDER**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2026, upon  
consideration of the Unopposed Application of the Rehabilitator to File Under Seal  
the Reply in Further Support of its Motion to Compel Discovery and for Sanctions  
(the “Reply”), it is hereby ORDERED that said Application is GRANTED and that  
the Reply 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

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IN HIS CAPACITY AS THE STATUTORY  
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INSURANCE COMPANY OF  
PENNSYLVANIA,

**No. 2 SHP 2022**

Plaintiff,

v.

VANBRIDGE, AN EPIC COMPANY, et al.,

Defendants.

**UNOPPOSED APPLICATION TO FILE UNDER SEAL THE REPLY IN  
FURTHER SUPPORT OF ITS 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, Plaintiff Pennsylvania Insurance Commissioner Michael Humphreys, in his capacity as Rehabilitator (“Rehabilitator”) of Senior Health Insurance Company of Pennsylvania, respectfully submits this Unopposed Application to File Under Seal the Reply in Further Support of its Motion of the

Rehabilitator to Compel Discovery and for Sanctions (the “Application”) 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 the 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 July 8, Dixon Hughes Goodman LLP filed its Response to the Rehabilitator’s Motion to Compel Discovery and for Sanctions against Dixon Hughes Goodman LLP (“Response”).

4. Accompanying their Response, Dixon Hughes Goodman LLP filed an Application to File Under Seal the Response to the Motion of the Rehabilitator to Compel Discovery and for Sanctions, which was granted by the Court on July 14, 2026.

5. On July 29, 2026, the Rehabilitator submitted contemporaneously with this Application a Reply in Further Support of its Motion to Compel and for Sanctions Against Defendant Dixon Hughes Goodman LLP (“Reply”).

6. The Reply discusses certain documents exchanged during discovery which have been designated as Confidential under the Protective Order.

7. Those Confidential exhibits are also appended to the Reply.

8. Pursuant to the Protective Order, Rehabilitator now files this application to have its Reply and the appended Confidential exhibits be filed under seal.

9. Though 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. Ct. 2003).

10. The determination as to public access must “necessarily depend upon the exercise of the trial court's discretion.” *Katz v. Katz*, 514 A.2d 1374, 1381 (Pa. Super. Ct. 1986).

11. 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.

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

13. The Rehabilitator believes there is good cause to keep these confidential materials and discussion of them in the Reply private and under seal.

WHEREFORE, Rehabilitator respectfully requests that the Court grant the Unopposed Application to File Under Seal its Motion of the Rehabilitator to

Compel Discovery and for Sanctions, along with the exhibits appended to that Motion.

Dated: July 29, 2026

**ND GALLI LAW LLC**

/s/ Nicole D. Galli

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Commissioner of the Commonwealth of  
Pennsylvania, as Statutory Rehabilitator of  
Senior Health Insurance Company of  
Pennsylvania*

## **CERTIFICATE OF SERVICE**

I, Nicole D. Galli, Esquire, do hereby certify that I caused to be served a true and correct copy of the foregoing document upon the following counsel of record via electronic mail:

|                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
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*Attorneys for Defendant, Dixon Hughes Goodman, LLP (a/k/a Forvis)*

**ND GALLI LAW LLC**

Dated: July 29, 2026

/s/ Nicole D. Galli  
Nicole D. Galli