



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

September 28, 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:

In accordance with Your Honor's Order of July 1, 2026, the parties jointly submit this status report on the progress of discovery in this matter, among other things.

Fact discovery has closed, and the parties are currently engaged in expert discovery. The Rehabilitator's expert report was served on August 3, 2026 and the parties deposed that expert on September 3, 2026. The status of the remaining discovery is discussed below.

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. It appears likely the dismissal will ultimately become with prejudice, but Plaintiff believes it is prudent to wait until at least the close of expert discovery to make that determination.

3. Vanbridge, an EPIC Company

Plaintiff's counsel has completed its review of the successor liability issues with Edgewood and believes Edgewood (Vanbridge, an EPIC Company) is an appropriate and viable defendant in this case.

Edgewood served its expert report on September 14, 2026 and its expert is being deposed on October 30 in Washington D.C..

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.

5. Dixon Hughes Goodman LLP

Dixon served its expert report on September 14, 2026 and its expert deposition is set for October 1 in Washington D.C.

Additionally, as the Court is aware, the Rehabilitator and Dixon have been in discussions pertaining to expanding collection and searching of documents since the hearing on August 19. Since that hearing, on September 2, 2026, Dixon produced a small set of documents that Dixon believes is largely duplicative of its prior productions.

The parties will continue to provide updates to the Court as information becomes available.

Additionally, the parties wish to raise with the Court the two topics below.

1. Summary Judgment/Expert Motions

Summary Judgment/Expert Motions are to be filed by October 19, 2026, with the final briefing concluded on December 2, 2026. The parties jointly request that the Court schedule a date/time for oral argument on such motions.

2. Mediation/Settlement Conference

The Parties have conferred and believe that it may be productive to have a mediation/settlement conference sometime after the October 19, 2026 filing of the motions set forth above, and before December 18, 2026.

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In closing, the parties are diligently working to complete expert discovery by the deadline consistent with the current Scheduling Order. If the Court desires further status reports, the Parties will provide them.

Respectfully,

A handwritten signature in cursive script, reading "Nicole D. Galli". The signature is written in dark ink and is positioned above the printed name.

Nicole D. Galli

cc: All Counsel of Record