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March 18, 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 December 23, 2025, the parties jointly submit this status report on the progress of discovery in this matter, among other things.

As explained further below, while the parties have made considerable progress in discovery in many areas since the last report, some documentary discovery is outstanding, as well as depositions, including of third-parties. With regard to depositions, Defendants Dixon and Edgewood have advised that they may seek to take at least 10-12 depositions in this matter, nearly all of third-party witnesses, which the parties anticipate will complicate scheduling. As such, additional time is required to complete discovery. A proposed scheduling order is being filed herewith for the Court's consideration.

To keep the parties focused on wrapping up this matter, as the Court will see in the proposed Order, the parties are presently seeking to push the current trial date to January 2027 with all other dates being moved out accordingly. The parties are committed to keep this case moving along to resolution as expeditiously as possible and anticipate that this will be our final request for an extension.

1. Bruckner Charitable Trust, Bruckner Investment Trust, and Roebing Re Ltd.

Upon Plaintiff's Praecipis, 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. Plaintiff has reviewed and analyzed those documents and has determined that, while based on the information currently available to Plaintiff, it appears likely the dismissal will ultimately become with prejudice, it is prudent to wait until at least the close of 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. Thus, Plaintiff served merits document requests on Edgewood on December 10, 2025, and Edgewood's responses were due on January 10, 2026. Counsel for Plaintiff and Edgewood have conferred several times and Edgewood produced a small set of documents responsive to Plaintiff's December 10, 2025 document requests, but has advised that more documents are forthcoming. Edgewood has committed to Plaintiff that it will finish its production by the end of the month.

4. Vanbridge LLC

This Vanbridge entity claimed not to be a legal entity that is required to respond to the Complaint. Upon our Praeipis, 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

Since the prior report, the parties have continued to exchange additional written discovery requests and responses and produced further responsive documents. Plaintiff has produced over 100,000 documents to date and is preparing its final set of documents for production, which are being produced on a rolling basis and expects to have completed its document production by the end of this month. Plaintiff has also served and supplemented its responses to interrogatories and requests for admissions as requested by Dixon, although it anticipates further supplementation may be required as discovery proceeds, especially from deposition testimony.

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With respect to the discovery directed to Dixon, to date Dixon has produced approximately 800 documents, with the majority of documents coming from one custodian. Dixon has advised Plaintiff that this is likely the extent of documents it has to produce in this case, and that it is continuing to consider questions raised by Plaintiff. Based on Plaintiff's review of Dixon's written responses and objections and document retention policies produced in early March, Plaintiff believes that Dixon should be in possession of additional responsive documents not yet produced. Plaintiff is awaiting Dixon's response to its March 2, 2026, letter on this subject but anticipates that the parties may be at an impasse and that the Court's intervention will be required. Overall, Plaintiff and Dixon continue to engage in meet and confer efforts regarding their questions and concerns about each party's respective document productions and anticipates that Court intervention may be required.

In closing, the parties respectfully request that the Court grant their request for an extension of the close of the discovery to and including July 10, 2026, with the subsequent deadlines and trial being moved out accordingly, as set forth in the proposed Order. The parties also believe that reporting to the Court in 90 days (*i.e.*, June 16, 2026) as presently scheduled, would be appropriate given the proposed extension of the discovery deadline.

Respectfully,



Nicole D. Galli

cc: All Counsel of Record