

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,

No. 2 SHP 2022

v.

VANBRIDGE, AN EPIC COMPANY, et
al.,

Defendants.

**[PROPOSED] ORDER GRANTING REHABILITATOR’S MOTION
TO COMPEL DISCOVERY AND FOR SANCTIONS AGAINST
DEFENDANT DIXON HUGHES GOODMAN LLP**

AND NOW, this _____ day of _____ 2026, upon consideration
of the Plaintiff Rehabilitator’s Motion to Compel Discovery and for Sanctions
Against Defendant Dixon Hughes Goodman LLP, it is hereby ORDERED that:

1. The Rehabilitator’s Motion to Compel Discovery and for Sanctions
Against Defendant Dixon Hughes Goodman LLP (“Dixon”) is
GRANTED.

It is further **ORDERED** that:

2. Dixon must produce all documents as to which it does not claim privilege

that are responsive to all of the Document Requests that Plaintiff Michael Humphreys, Insurance, Commissioner of the Commonwealth of Pennsylvania in His Capacity as the Statutory Rehabilitator of Senior Health Insurance Company of Pennsylvania (“SHIP”) has served on Dixon, including but not limited to all documents responsive to request Nos. 27 and 28 in SHIP’s Second Set of Requests for Production, within 14 days of entry of this Order and certify to the Court when such production is complete;

3. Within 14 days of execution of this Order Defendant Dixon shall
 - a. provide verified, amended responses to SHIP’s Second and Third Set of Requests for Production of Documents and certify to the Court when such amended responses have been served;
 - b. certify to the Court that the Roberts, Russ, and Sabella e-mail mailboxes have been independently searched for responsive documents;
 - c. provide an explanation as to why Dixon has refused to produce relevant documents from these custodians that should have been prevented from autodeletion in accordance with the preservation and litigation holds placed on these custodians on or around September 7, 2020 and February 7, 2022, respectively;

4. Dixon is barred from arguing that there is “no evidence” of wrongdoing by Dixon;
5. Plaintiff SHIP is granted an adverse inference at trial against Dixon that the missing documents would support SHIP’s arguments about Dixon’s wrong-doing;
6. Plaintiff SHIP is awarded its costs and fees for bringing this motion, for the drafting of, and meeting and conferring pertaining to, SHIP’s Third Set of Requests for Production, and for the drafting of the January and March 2026 discovery letters to Dixon; and
7. [ANY ADDITIONAL SANCTIONS THIS COURT SEES FIT TO ORDER]

BY THE COURT:

MARY HANNAH LEAVITT
President Judge Emerita