

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

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In Re: Penn Treaty Network America Insurance Company in Rehabilitation	:	DOCKET NO. 1 PEN 2009
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In Re: American Network Insurance Company in Rehabilitation	:	DOCKET NO. 1 ANI 2009
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**THE REHABILITATOR’S OMNIBUS RESPONSE  
TO THE PTAC INTERVENORS’ APPLICATIONS TO  
RECOVER LEGAL FEES, COSTS, AND OTHER EXPENSES**

For all of the reasons stated in the Rehabilitator’s August 17, 2015 Response to the PTAC Intervenor’s fourth fee application, which are hereby incorporated, the PTAC Intervenor’s sixth and seventh fee applications (which were both filed on January 26, 2016) should be summarily rejected. Furthermore, the Rehabilitator reserves her right to object to all future fee applications and to raise related issues on appeal.

Respectfully submitted,

Dated: January 28, 2016

/s/ Carl Buchholz

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capacity as statutory rehabilitator of Penn  
Treaty Network America Insurance Co. and  
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