

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In Re: Penn Treaty Network America : Insurance Company in Rehabilitation	:	No. 1 PEN 2009
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and

In Re: American Network Insurance Company in Rehabilitation	:	No. 1 ANI 2009
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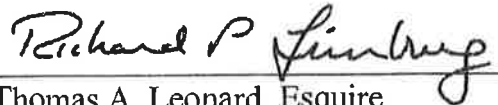
**RESPONSE OF THE POLICYHOLDERS COMMITTEE
TO THE APPLICATION OF BROADBILL PARTNERS
TO COMPEL DISCOVERY FROM THE REHABILITATOR**

The Policyholders Committee, by and through its undersigned counsel, hereby submits this Response to the Application of Broadbill Partners LP (“Broadbill”) for an order to compel discovery from the Rehabilitator, which, if granted, may negatively affect the interests of the Committee and policyholders generally.

1. For the reasons set forth in the Committee’s 10/26/15 Response to the Application of Eugene Woznicki and Penn Treaty American Corporation for an order compel discovery from the Rehabilitator, the Committee respectfully asks that the Court deny Broadbill’s discovery application insofar as it seeks discovery of communications covered by the Rehabilitator’s common interest agreement with the Policyholders

Committee, discovery concerning the 2013 plans, rate increases obtained by solvent insurers, and communications concerning rate increases.

Respectfully submitted,
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Dated: October 26, 2015

CERTIFICATE OF SERVICE

I certify that on October 26, 2015, I caused a true and correct copy of the foregoing Response to be served on the following persons by email at the email addresses indicated below:

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