

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In Re: Penn Treaty Network America
Insurance Company
in Rehabilitation

No. 1 PEN 2009

In Re: American Network Insurance
Company
in Rehabilitation

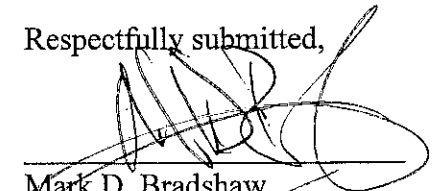
No. 1 ANI 2009

RECEIVED & FILED
COMMONWEALTH COURT
OF PENNSYLVANIA
2014 NOV 19 P 2:56

**NATIONAL ORGANIZATION OF LIFE AND HEALTH INSURANCE
GUARANTY ASSOCIATIONS' RESPONSE IN SUPPORT OF APPLICATION OF THE
POLICYHOLDER COMMITTEE
TO APPROVE ADDITIONAL HOURS FOR ITS CONSULTING ACTUARY**

The National Organization of Life and Health Insurance Guaranty Associations (“NOLHGA”), through counsel, respectfully files this response in support of the Application of the Policyholder Committee To Approve Additional Hours for Its Consulting Actuary (“Application”). NOLHGA supports the Application because it is necessary for the Policyholder Committee to have an informed view to represent the interests of 90,000 policyholders in negotiations on the Second Amended Plan. As the Policyholder Committee represented in its motion, those negotiations depend on actuarial modeling and analysis. Mr. Bagshaw’s independent actuarial advice is critical to permit the Policyholder Committee to participate meaningfully in the process that the Rehabilitator and several Formal Commenters have underway to resolve the outstanding issues the Special Deputy identified for the Court at the November 6, 2014 status conference. NOLHGA hopes and expects that this process will mitigate potential objections to the Second Amended Plan and ensure that policyholders are protected in the fairest way possible in the face of an over \$3 billion asset deficit.

Respectfully submitted,



Mark D. Bradshaw

Attorney ID # 61975

STEVENS & LEE, A Professional Corporation

17 North Second Street

16th Floor

Harrisburg, PA 17101

(717) 255-7357

Dated: November 19 2014

Attorneys for the National Organization of Life and
Health Insurance Guaranty Associations

Charles T. Richardson
FAEGRE BAKER DANIELS LLP
1050 K Street, NW
Suite 400
Washington, DC 20001
(202) 312-7487

David K. Herzog
Caryn M. Glawe
FAEGRE BAKER DANIELS LLP
300 North Meridian Street, Suite 2700
Indianapolis, IN 46204
(317) 237-0300

Of Counsel

CERTIFICATE OF SERVICE

I, Erika L. Montgomery, an employee of Stevens & Lee, certify that on November 19, 2014, I caused a true and correct copy of the foregoing Response in Support of Application to be served on the following persons by mail at the addressed indicated below:

Patrick H. Cantilo
Special Deputy Rehabilitator
Cantilo & Bennett, LLP
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758

Stephen W. Schwab
DLP Piper LLP (US)
203 North LaSalle Street, Suite 1900
Chicago, IL 60601-1293

Charles T. Richardson
Faegre Baker Daniels
1050 K Street NW, Suite 400
Washington, DC 20001-4448

Harold S. Horwich
Bingham McCutchen LLP
One State Street
Hartford, CT 06103-3178

Carl Buchholz
DLA Piper LLP (US)
One Liberty Place
1650 Market Street
Philadelphia, PA 19103-7300

Douglas Y. Christian
Ballard Spahr LLP
1735 Market Street, 51st floor
Philadelphia, PA 19103

Paul M. Hummer
Saul Ewing LLP
Centre Square West
1500 Market Street, 38th floor
Philadelphia, PA 19102-2186

Andrew Parlen
O'Mclveny & Myers, LLP
1625 Eye Street, NE
Washington, DC 20006

