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COMMONWEALTH COURT
OF PENNSYLVANIA

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 AMENDED APPLICATION FOR ENTRY OF A PROTECTIVE ORDER

Pennsylvania Insurance Commissioner Teresa D. Miller, in her capacity as statutory rehabilitator of Penn Treaty Network America Insurance Company (“PTNA”) and American Network Insurance Company (“ANIC,” and collectively with PTNA, “the Companies”), respectfully requests that the Court enter a protective order limiting the scope of discovery¹ in this matter to the substance of the Plan.² The Court should limit discovery by any interested person to the issues

¹ Discovery requests have been served by Intervenors Eugene Woznicki and Penn Treaty American Corporation (collectively with Woznicki, “PTAC”), the nine Health Insurers who have appeared in this matter, the Policyholders’ Committee, and the Rehabilitator.

² Separately, the Rehabilitator has been meeting and conferring with counsel for various intervenors about discovery, including the proposed entry into a Confidentiality Agreement and Protective Order governing the production and use of documents in this case. The Rehabilitator reserves the right to object to any request on the basis of privilege or confidentiality. This application amends the application that the Rehabilitator filed on March 27, 2015.