

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

Re: Penn Treaty Network America  
Insurance Company in Rehabilitation

DOCKET NO. 1 PEN 2009

In Re: American Network Insurance  
Company in Rehabilitation

DOCKET NO. 1 ANI 2009

**APPLICATION FOR RELIEF TO FILE A SURREPLY**

Penn Treaty American Corporation, Eugene J. Woznicki, and Broadbill Investment Partners, LP (together, "PTAC Intervenors") hereby request leave of the Court to file the attached brief, along with the exhibits thereto, as a surreply in further support of the Joint Application for Settlement Approval. This memorandum of law addresses arguments that the Health Insurers have raised in their August 4, 2016 Reply Memorandum in support of their objection to the Settlement Agreement.

WHEREFORE, the PTAC Intervenors respectfully request that the Court grant this Application and docket the attached brief as a surreply with regard to the Joint Application for Settlement Approval.

Dated: August 29, 2016

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By: */s/ Douglas Y. Christian*

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**ORDER**

**AND NOW**, this \_\_\_\_\_ day of \_\_\_\_\_, 2016, upon consideration of the PTAC Intervenors' Application for Relief to File a Surreply, it is hereby **ORDERED** that the Application is **GRANTED**. The Clerk of the Court shall docket the brief attached to the PTAC Intervenors' Application as a surreply with regard to the Joint Application for Settlement Approval.

\_\_\_\_\_  
HON. MARY HANNAH LEAVITT  
President Judge of the Commonwealth Court

**CERTIFICATE OF SERVICE**

I hereby certify that on August 29, 2016, I caused a true and correct copy of the foregoing

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