

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

In 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

**SECOND REQUEST FOR EXTENSION  
TO RESPOND TO LIQUIDATION PETITIONS**

Each undersigned Party hereby stipulates as follows:

1. On June 14, 2016, the Commissioner, Penn Treaty American Corporation (“PTAC”) and Broadbill Partners, LP (“Broadbill”) filed the Verified Joint Application for Approval of Settlement Agreement (the “Joint Application”). That matter has been fully briefed and is ripe for decision.

2. On July 27, 2016, the Commissioner filed Verified Petitions to Convert Rehabilitation to Liquidation (the “Liquidation Petitions”).

3. On September 8, 2016, the Court granted the Request for Extension to Respond to Liquidation Petition filed on September 6, 2016 by the Commissioner, PTAC and Eugene Woznicki, Chairman of the Boards of Directors of Penn Treaty Network America Insurance Company and American Network Insurance Company (PTAC and Mr. Woznicki are referred to herein as the “PTAC Intervenors”). Accordingly, the PTAC Intervenors’ deadline for responding to the Liquidation Petitions has been extended to September 26, 2016.

4. The PTAC Intervenors assert that the Court’s approval of the Joint Application is a dispositive issue for them in regards to the Liquidation Petitions.

5. Litigation between the Parties concerning the Liquidation Petitions while the Joint Application is pending would needlessly waste the assets of PTNA, ANIC, and the PTAC Intervenors, and it would contravene the provisions of the Parties' Settlement Agreement that is before the Court for its determination.

6. This Court has the power to alter the time for response to an application for relief or court approval by the receiver under Pennsylvania Rule of Appellate Procedure 3776.

7. The Parties agree that (a) any obligation of Woznicki, the Boards of PTNA and ANIC, and/or PTAC to respond to the Liquidation Petitions is extended until October 28, 2016; and (b) this extension is without prejudice to any Party hereto seeking a further extension by agreement or Court Order.

Therefore, the Parties respectfully request that this Court (a) extend any obligation of Woznicki, the Boards of PTNA and ANIC, and/or PTAC to respond to the

Liquidation Petitions until October 28, 2016, and (b) grant this extension without prejudice to any Party hereto seeking a further extension by agreement or Court Order.

DLA PIPER LLP (US)

By: Stephen W. Schwab

Stephen W. Schwab (Pa. Bar ID 315169)  
DLA PIPER LLP (US)  
1650 Market Street, Suite 4900  
Philadelphia, PA 19103  
Telephone: (215) 665-3300

*Attorneys for Teresa Miller,  
Insurance Commissioner of Pennsylvania*

BALLARD SPAHR LLP

By: Douglas Y. Christian

Douglas Y. Christian (PA ID. No. 41934)  
BALLARD SPAHR LLP  
1735 Market Street, 51<sup>st</sup> Floor  
Philadelphia, PA 19103  
(215) 665-8500

*Attorneys for Intervenors  
Eugene J. Woznicki and  
Penn Treaty American Corporation*

Dated: September 20, 2016