

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Michael F. Consedine, Insurance Commissioner	
v.	1 PEN 2009
Penn Treaty Network America Insurance Company and American Network Insurance Company	1 ANI 2009

**Application of Policyholders Committee for Additional Time
to Consider the Rehabilitator's Amended Plan
and Updated Actuarial Projections before Filing**

The Policyholders Committee of Penn Treaty Network America Insurance Company and American Network Insurance Company, by the undersigned attorneys, respectfully apply to the Court for sixty days additional time to consider the Rehabilitator's proposed Amended Plan of Rehabilitation and updated actuarial projections before the Amended Plan is filed of record. The reasons for this application are:

1. The Rehabilitator has represented to the Court that he will file an Amended Plan on August 8, 2014.
2. The Rehabilitator will provide the Amended Plan in draft form to counsel for the Committee for the first time on or about July 28, 2014.
3. The Amended Plan has to be read in light of the updated actuarial projections which PriceWaterhouseCoopers ("PWC") is preparing as of December 31, 2013.

4. PWC has not yet shared its projections or its report and opinion concerning the financial condition of the company as of December 31, 2013 with the Committee.

5. The Committee has requested that certain analyses of the 2012 projections be redone using the 2013 projections, and those analyses will not be available for several weeks.

6. The time remaining before August 8, 2014 is simply not sufficient for the Committee to review the updated projections and analyses with its consulting actuary.

7. The Committee's consulting actuary will need at least a month to familiarize himself with the updated projections from the time when he receives them.

8. The time remaining before August 8, 2014 also is not sufficient for the Committee members, all of whom are volunteers, to review the updated projections and analyses and the draft Amended Plan, to consider the advice of the Committee's counsel and consulting actuary, and to provide meaningful feedback to the Rehabilitator.

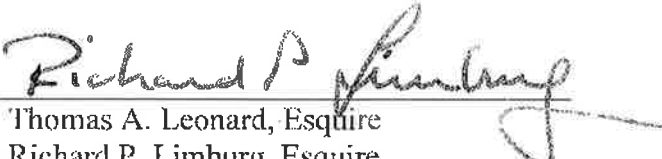
9. The Committee earnestly desires additional time to complete the process of resolving potential objections to the Amended Plan before it is filed.

10. The Committee believes that continuing to address open issues with the Rehabilitator in a cooperative manner will streamline the confirmation of the Amended Plan and that an additional sixty days from August 8 to October 8, will be sufficient for this purpose.

WHEREFORE, the Committee respectfully requests that the Court allow the Committee until October 8, 2014 to consider the proposed Amended Plan and the

Rehabilitator's updated projections as of December 31, 2013 and to continue to consult and negotiate with the Rehabilitator before the Amended Plan is filed.

Respectfully submitted,

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Dated: July 14, 2014

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[Proposed] ORDER

AND NOW, this ____ day of _____, 2014, upon consideration of the motion of the Policyholders Committee for additional time to consider the Rehabilitator's proposed Amended Plan before filing, and the responses thereto, it is hereby ORDERED that the Application is GRANTED, and the Committee shall have until October 8, 2014 to consider the proposed Amended Plan and the Rehabilitator's updated projections as of December 31, 2013 and to continue to consult and negotiate with the Rehabilitator before the Amended Plan is filed.

BY THE COURT:

Mary Hannah Leavitt, J.

CERTIFICATE OF SERVICE

I certify that on July 14, 2014, I caused a true and correct copy of the foregoing Application to be served on the following persons by email at the email addresses indicated below:

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