

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

**RESPONSE OF THE NATIONAL ORGANIZATION OF LIFE AND HEALTH
INSURANCE GUARANTY ASSOCIATIONS TO THE APPLICATIONS TO COMPEL
FILED BY THE PTAC/WOZNICKI INTERVENORS AND THE HEALTH INSURERS**

The PTAC/Woznicki Intervenors' Application for Relief to Compel Production of Documents and Answers to Interrogatories and Requests to Admit from the Rehabilitator ("PTAC Application") and the Health Insurers' Application for an Order to Compel Answers to Interrogatories and the Production of Documents by the Rehabilitator ("Health Insurers Application") ask the Court to compel the Rehabilitator to produce (among other things) certain documents relating to communications with or about the National Organization of Life and Health Insurance Guaranty Associations ("NOLHGA") and its member guaranty associations, and its members' statutory responsibilities, and to respond to interrogatories regarding such communications. NOLHGA joins in the Rehabilitator's opposition to those portions of the PTAC Application and the Health Insurers Application that relate to such communications. NOLHGA respectfully requests the opportunity to be heard by the Court at the oral argument on the relevant Applications.

Respectfully submitted,

Dated: October 26, 2015



Mark D. Bradshaw
Attorney ID # 61975
STEVENS & LEE,
A Professional Corporation
17 North Second Street, 16th Floor
Harrisburg, PA 17101
(717) 255-7357

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

Caryn M. Glawe
FAEGRE BAKER DANIELS LLP
300 North Meridian Street, Suite 2700
Indianapolis, IN 46204
(317) 237-1488

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

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing upon the persons and in the manner indicated below, which service satisfies the requirements of the Court's December 3, 2014 Case Management Orders for Comments and Hearing on the Proposed Second Amended Plan of Rehabilitation:

Service By Electronic Mail:

James R. Potts, Esq.
Cozen O'Connor
1900 Market Street
Philadelphia, PA 19103
planservice@cozen.com

Patrick H. Cantilo
Special Deputy Rehabilitator
Cantilo & Bennett LLP
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758
phcantilo@cb-firm.com

Stephen W. Schwab
DLA Piper LLP
203 North LaSalle Street, Suite 1900
Chicago, IL 60601-1293
stephen.schwab@dlapiper.com

Carl Buchholz
DLA Piper LLP
1650 Market Street
Philadelphia, PA 19103-7300
carl.buchholz@dlapiper.com

Douglas Y. Christian
Benjamin M. Schmidt
Ballard Spahr LLP
1735 Market Street, 51st Floor
Philadelphia, PA 19103
christiand@ballardspahr.com
schmidt@ballardspahr.com

Elizabeth J. Goldstein
Dilworth Paxon, LLP
112 Market Street, Suite 800
Harrisburg, PA 17101
egoldstein@dilworthlaw.com

Andrew Parlen
O'Melveny & Myers LLP
1625 Eye Street, NE
Washington, DC 20006
aparlen@omm.com


John P. Lavelle, Jr.
Morgan Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103
jlavelle@morganlewis.com

Thomas A. Leonard
Richard Limburg
Obermayer Rebmann Maxwell & Hippell LLP
One Penn Center, 19th Floor
1617 John F. Kennedy Blvd.
Philadelphia, PA 19103
thomas.leonard@obermayer.com
richard.limburg@obermayer.com

Harold S. Horwich
Benjamin J. Cordiano
Morgan Lewis & Bockius LLP
One State Street
Hartford, CT 06103-3178
harold.horwich@morganlewis.com
benjamin.cordiano@morganlewis.com

Paul M. Hummer
Saul Ewing LLP
Centre Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102-2186
phummer@saul.com

Dated: October 26, 2015



Mark D. Bradshaw
Attorney ID # 61975
STEVENS & LEE,
A Professional Corporation
17 North Second Street, 16th Floor
Harrisburg, PA 17101