

**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 OMNIBUS RESPONSE  
TO THE PTAC INTERVENORS’ APPLICATIONS TO  
RECOVER LEGAL FEES, COSTS AND OTHER EXPENSES**

For all of the reasons stated in the Rehabilitator’s August 17, 2015 Response to the PTAC Intervenors’ fourth fee application (hereby incorporated herein), the Court should deny the PTAC Intervenors’ eighth fee application, for recovery of Ballard Spahr’s fees and costs incurred between January 1, 2016 and March 31, 2016. The application also should be rejected because it seeks \$45,738.00 related to Grant Thornton LLP’s fees and expenses for a tax expert witness, Gregory Fairbanks. Mr. Fairbanks’ report reveals that PTAC’s shareholder, Broadbill Partners, shared in his retention. Broadbill has intervened in this case solely in order to preserve the value of its own post-May 2012 investment in PTAC.

The Rehabilitator continues to reserve her right to object to all future fee applications and to raise related issues on appeal.

Respectfully submitted,

Dated: May 16, 2016

/s/ Carl Buchholz

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Treaty Network America Insurance Co. and  
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## **CERTIFICATE OF SERVICE**

I certify that, on May 16, 2016, I caused the foregoing Omnibus Response to the PTAC Intervenors' Applications to Recover Legal Fees, Costs, and Other Expenses to be served on the following counsel of record:

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