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Brackbill, Robert

From: Brackbill, Robert
Sent: Tuesday, April 30, 2013 1:34 PM
To: Brackbill, Robert
Subject: Letter to the Pennsylvania Insurance Department dated April 25, 2013

From: Pratter, Robert L. [<mailto:RPratter@duanemorris.com>]
Sent: Tuesday, April 30, 2013 12:22 PM
To: Frantz, Jodi (Insurance)
Cc: Pratter, Robert L.
Subject: RE: Letter to the Pennsylvania Insurance Department dated April 25, 2013

Jodi, thank you for sending the letter. Having received it only a few minutes ago, I request on behalf of DGI and Atlantic States that the Department take no further action on Mr. Shepard's Form A Application or his counsel's letter dated April 25, 2013 until we have had a fair and adequate opportunity to review and respond to the letter. Please confirm that DGI and Atlantic States will be accorded that opportunity.

We also renew our pending request for a copy of Exhibits H-M, which we believe DGI and Atlantic States are legally entitled to receive and review prior to any further action being taken on the Form A Application for the reasons we have previously stated.

In addition, we request a copy of the attachments to the letter dated April 25, 2013 consisting of Mr. Shepard's response to the Iowa letter and all other information that Mr. Shepard and his counsel provide to the Department.

We also object to any hearing be scheduled as requested by Mr. Shepard's counsel until such time as we have had a fair and adequate opportunity to respond to the letter dated April 25, 2013 and his request. However, we respectfully note initially that no hearing should be scheduled until the Form A Application has been deemed complete by the Department and DGI and Atlantic States have been provided with the complete Form A Application, all exhibits, all information submitted in connection with Mr. Shepard's response to the Department's letter dated April 17, 2013, and all other information and documents that may have otherwise been submitted by Mr. Shepard to the Department in connection with the Form A Application.

Thank you for your attention to our requests .

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