Filed 10/23/2014 Commonwealth Court of Pennsylvania 12 FSS 2014

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Crittenden County Hospital, Inc., d/b/a	:
Crittenden Health Systems, Objector,	Objection to Notice of Determination
V.	: Re: Proofs of Claim No. 907
First Sealord Surety, Inc. (In Liquidation)	: No. 12 FSS 2014
(Ancillary Matter to In Re: First Sealord Surety, Inc., No. 1 FSS 2012)	

NOTICE OF AGREEMENT TO EXTEND LIQUIDATOR'S RESPONSE TIME

The parties in the above-captioned matter hereby submit this Agreement pursuant to the rules of the Estimated Claim Value Process that were approved by this Court by Order dated May 16, 2014, providing that the deadline for Michael F. Consedine, Insurance Commissioner of the Commonwealth of Pennsylvania in his Official Capacity as Statutory Liquidator of First Sealord Surety, Inc., to respond to the Objection to Notice of Determination in the above-captioned matter is extended from October 31, 2014 to December 1, 2014. The agreement of

representatives of the respective parties is memorialized in the email exchange that is attached to this Notice as Exhibit A.

Respectfully submitted:

By:

PRESTON M. BUCKMAN (I.D. #57570) Insurance Department Counsel Governor's Office of General Counsel Pennsylvania Insurance Department Capitol Associates Building 901 North 7th Street Harrisburg, PA 17102 (717) 787-6009

Attorney for Michael F. Consedine, Insurance Commissioner of the Commonwealth of Pennsylvania, in his official capacity as Statutory Liquidator of FSSI

Dated:___ \mathbf{O}

EXHIBIT A

Haag, Dennis

From:	
Sent:	•
To:	
Subjec	:t:

Jason C. Tomasulo <jtomasulo@cohenseglias.com> Monday, October 20, 2014 4:14 PM Haag, Dennis RE: Crittenden Health System [CSPGF-Active.FID416420]

Dennis,

One clarification: it was not my proposal. In response to your request for a time extension to file a response to the Objection filed by Crittenden Health Systems, I agreed to provide the Liquidator a thirty (30) day time extension. I understand the Liquidator's response is currently due on October 31, 2014. Accordingly, the response will now be due on or before December 1, 2014.

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Jason

From: Haag, Dennis [mailto:c-dhaag@pa.gov]. Sent: Monday, October 20, 2014 3:27 PM To: Jason C. Tomasulo Subject: Crittenden Health System

Jason,

Thank you for your call this afternoon. If I understood your proposal, you would agree to a thirty (30) day extension for our filing of a response to the objection filed by Crittenden Health System.

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By return email, please confirm that the above is correct. I will have our counsel draft the document required by Commonwealth Court.

Dennis Haag | Chief

Insurance Department | Bureau of Liquidations & Rehabilitations 901 N. 7th Street | Harrisburg PA 17102 Phone: 717.787.7823 | Fax 717.783-9326 www.insurance.pa.gov | www.chipcoverspakids.com

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 1 Pa. Code Chapter 33 in the following manner:

Service by first-class mail, addressed as follows:

Douglas Y. Christian, Esquire christiand@ballardspahr.com Benjamin M. Schmidt, Esquire schmidtb@ballardspahr.com Ballard Spahr LLP 1735 Market Street, 51st Floor Philadelphia, PA 19103 (215) 665-8500 (215) 864-8999 (fax)

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Attorney for Michael F. Consedine, Insurance Commissioner of the Commonwealth of Pennsylvania, in his official capacity as Statutory Liquidator of FSSI

Dated: 0



COMMONWEALTH OF PENNSYLVANIA GOVERNOR'S OFFICE OF GENERAL COUNSEL

October 23, 2014

Michael F. Krimmel, Chief Clerk Commonwealth Court of Pennsylvania 601 Commonwealth Avenue, Suite 2100 P.O. Box 69185 Harrisburg, PA 17120-9185

> Re: Crittenden County Hospital, Inc., d/b/a Crittenden Health Systems v. First Sealord Surety, Inc. (In Liquidation) Objection to Notice of Determination Re POC No. 907 No. 12 FSS 2014 Ancillary Matter to In Re: First Sealord Surety, Inc., No. 1 FSS 2012

Dear Mr. Krimmel:

Attached please find a Notice of Agreement to Extend Liquidator's Response Time with regard to the above-referenced liquidation.

Thank you for your assistance in this matter.

Very truly yours,

BAN

Preston M. Buckman Insurance Department Counsel

PMB:drh

Enclosures