

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

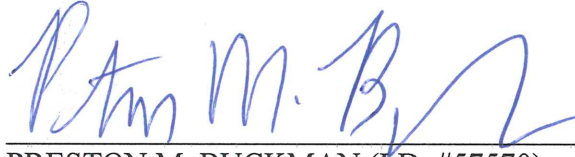
Jeffrey Burns	:	
	:	
Objector	:	
	:	Objection to Notice of Determination
v.	:	
	:	Re: Proof of Claim No. 1206
Lincoln General Insurance Company	:	
(In Liquidation)	:	No. 2 LIN 2017
	:	
	:	
(Ancillary Matter to In Re: Lincoln	:	
General Insurance Company (In	:	
Liquidation), No. 1 LIN 2015)	:	

NOTICE OF AGREEMENT TO EXTEND LIQUIDATOR’S RESPONSE TIME

The parties in the above-captioned objection proceeding hereby submit this Notice of Agreement pursuant to Pa. R.A.P. 3781(c)(3) advising the Court that the parties have agreed that the deadline for Teresa D. Miller, Insurance Commissioner of the Commonwealth of Pennsylvania in her Official Capacity as Statutory Liquidator of Lincoln General Insurance Company (the “Liquidator”), to respond to the Objector’s Objection to Notice of Determination is extended 60 days, from July 22, 2017, to September 20, 2017, while the parties negotiate to resolve the issues presented in the instant Objection to Notice of Determination. Either party may terminate this agreement upon written notice to the other party and, if terminated, the Liquidator shall have thirty (30) days to file a response to the Objection to Notice of Determination.

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

Respectfully submitted,



PRESTON M. BUCKMAN (I.D. #57570)

Insurance Department Counsel

Office of Liquidations, Rehabilitations
& Special Funds

Governor's Office of General Counsel

Capital Associates Building

901 North 7th Street

Harrisburg, PA 17102

(717) 787-6009

Attorney for Teresa D. Miller, Insurance
Commissioner of the Commonwealth of
Pennsylvania, in her capacity as Statutory Liquidator
of Lincoln General Insurance Company In
Liquidation

Dated: _____

7/19/17

EXHIBIT A

Buckman, Preston

From: Haag, Dennis
Sent: Friday, July 14, 2017 12:12 PM
To: Buckman, Preston
Subject: FW: Lincoln General Insurance Co - Jeffrey Burns

From: Anthony James Urban [mailto:AUrban@urbanlaw.com]
Sent: Friday, July 14, 2017 12:06 PM
To: Haag, Dennis <c-dhaag@pa.gov>
Subject: RE: Lincoln General Insurance Co - Jeffrey Burns

60 days, if that is ok with your office.

From: Haag, Dennis [mailto:c-dhaag@pa.gov]
Sent: Friday, July 14, 2017 12:03 PM
To: Anthony James Urban
Subject: RE: Lincoln General Insurance Co - Jeffrey Burns

Mr. Urban,

Would you like to extend the time 30 or 60 days?

Dennis E. Haag, Chief
Bureau of Liquidation Claims
Office of Liquidations & Rehabilitations
Capitol Associates Building
901 N. 7th Street
Harrisburg, PA 17102
Phone (717) 787-7823 x3202
Fax (717) 783-9326
www.insurance.pa.gov

From: Anthony James Urban [mailto:AUrban@urbanlaw.com]
Sent: Friday, July 14, 2017 11:28 AM
To: Haag, Dennis <c-dhaag@pa.gov>
Subject: RE: Lincoln General Insurance Co - Jeffrey Burns

Mr. Haag: I have no objection to an extension. Thank you.

From: Haag, Dennis [mailto:c-dhaag@pa.gov]
Sent: Thursday, July 13, 2017 4:19 PM
To: Anthony James Urban
Subject: FW: Lincoln General Insurance Co - Jeffrey Burns

Mr. Urban,

I have been trying to reach you, unsuccessfully, since we last spoke on May 30. At this point, I am seeking your assistance to extend our time to respond to the objection to Notice of Determination #1206.

If you would be so kind to respond to this email and agree to an extension, we will handle the filing from our office.

Thank you.

Dennis E. Haag, Chief

Bureau of Liquidation Claims

Office of Liquidations & Rehabilitations

Capitol Associates Building

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Harrisburg, PA 17102

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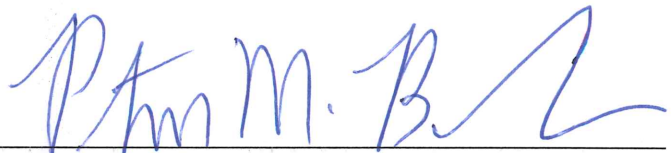
CERTIFICATE OF SERVICE

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 via regular U.S. Mail addressed as follows:

Jordan L. Miller, Esquire
jordanm@jdsalaw.com
Jeffers, Danielson, Sonn & Aylward, P.S.
2600 Chester Kimm Road
Wenatchee, WA 98801
(509) 662-3685
(509) 662-2452 (fax)

Anthony J. Urban, Esquire
AUrban@urbanlaw.com
Anthony Urban Law Offices
474 North Center Street, 3rd Floor
P.O. Box 890
Pottsville, PA 17901-0890
(570) 622-1247



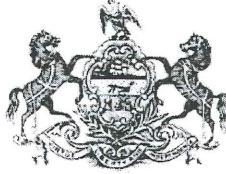
PRESTON M. BUCKMAN (I.D. #57570)

Insurance Department Counsel
Office of Liquidations, Rehabilitations
& Special Funds
Governor's Office of General Counsel
Capital Associates Building
901 North 7th Street
Harrisburg, PA 17102
(717) 787-6009

Counsel for the Statutory Liquidator of Lincoln
General Insurance Company

DATED: _____

7/19/17



COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE OF GENERAL COUNSEL

July 19, 2017

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

***Re: Jeffrey Burns, Objector v. Lincoln General Insurance Company (In Liquidation)
No. 2 LIN 2017 (Ancillary Matter to In Re: Lincoln General Insurance Company
(In Liquidation), No. 1 LIN 2015)***

Dear Mr. Krimmel:

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

Thank you for your assistance in this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Preston M. Buckman".

Preston M. Buckman
Insurance Department Counsel

PMB:drh

Enclosure