

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

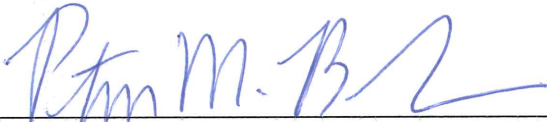
Jeffrey Burns	:	
	:	
Objector	:	
	:	Objection to Notice of Determination
v.	:	
	:	Re: Proof of Claim No. 1206
Lincoln General Insurance Company	:	
(In Liquidation)	:	No. 2 LIN 2017
	:	
	:	
(Ancillary Matter to In Re: Lincoln	:	
General Insurance Company (In	:	
Liquidation), No. 1 LIN 2015)	:	

**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 Jessica K. Altman, Acting 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 September 20, 2017, to November 19, 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:

By: 

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

Attorney for Jessica K. Altman, Acting Insurance  
Commissioner of the Commonwealth of  
Pennsylvania, in her official capacity as Statutory  
Liquidator of Lincoln General Insurance Company

Dated: 9/19/17

# **EXHIBIT A**

## Lightner, Brenda

---

**From:** Anthony James Urban <AUrb@urbanlaw.com>  
**Sent:** Wednesday, September 06, 2017 2:13 PM  
**To:** Lightner, Brenda  
**Subject:** RE: Jeffery Burbs

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Brenda:

If for some reason you do not receive the discontinuance back from our office shortly, allow this to confirm that your office has a sixty (60) day extension to respond to our objection.

Regards,

Tony

---

**From:** Lightner, Brenda [mailto:c-blightne@pa.gov]  
**Sent:** Wednesday, September 06, 2017 1:59 PM  
**To:** Anthony James Urban  
**Subject:** Jeffery Burbs

Anthony,

As a follow up to our conversation you have agreed to file a Praeipce to Discontinue the filed objection in Pennsylvania Commonwealth Court. After speaking with you today no Praeipce has been filed for the Discontinuance. You have indicated your paralegal has the form to make some changes and has not returned to you in order to file.

Our attorney must file a response to the abjection by 9/20/17. Can you please confirm in writing the Praeipce will be filed by the due date of 9/20/17 ? If the Praeipce is not filed in due time we are asking for permission for you to agree to extend our time to respond to the objection.

Regards,  
Brenda

**Brenda Lightner I Evaluator II**  
Capitol Associates Building  
901 N. 7<sup>th</sup> Street | Harrisburg, PA 17102  
Phone (717) 787-7823 ext 3207 | Fax (717) 783-9326  
[www.insurance.pa.gov](http://www.insurance.pa.gov)  
Twitter: @PAInsuranceDept  
Facebook: Facebook.com/PAInsuranceDepartment

**CERTIFICATE OF SERVICE**

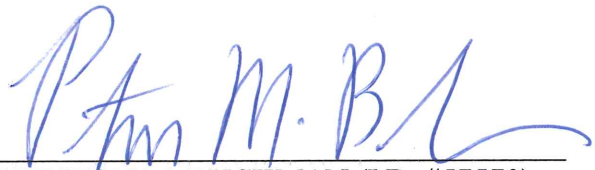
I hereby certify that I am this day serving the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 1 Pa. Code Chapter 33 in the following manner:

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)

Arleigh P. Helfer III, Esquire  
*ahelfer@schnader.com*  
Schnader Harrison Segal & Lewis LLP  
1600 Market Street, Suite 3600  
Philadelphia, PA 19103  
(215) 751-2430  
(215) 751-2205 (fax)

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

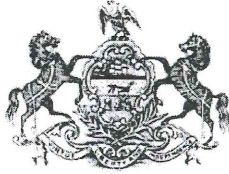


PRESTON M. BUCKMAN (I.D. #57570)  
Insurance Department Counsel  
Office of Liquidations, Rehabilitations  
& Special Funds  
Governor's Office of General Counsel  
Capital Associates Building  
901 North 7<sup>th</sup> Street  
Harrisburg, PA 17102  
(717) 787-6009

Counsel for the Statutory Liquidator of  
Lincoln General Insurance Company

DATED: \_\_\_\_\_

9/19/17



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

September 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 that reads "Preston M. Buckman".

Preston M. Buckman  
Insurance Department Counsel

PMB:drh

Enclosure