

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

RAYMOND G. FARMER, *as Director of the* )  
*South Carolina Department of Insurance, and* )  
THE SOUTH CAROLINA DEPARTMENT OF )  
INSURANCE, )

Plaintiffs, )

v. )

JESSICA K. ALTMAN, *as Rehabilitator of Senior* )  
*Health Insurance Company of Pennsylvania,* )  
PATRICK H. CANTILO, *as Special Deputy* )  
*Rehabilitator of Senior Health Insurance Company* )  
*of Pennsylvania, and SENIOR HEALTH* )  
INSURANCE COMPANY OF PENNSYLVANIA, )

Defendants. )

Case No. 3:21-cv-00097-MGL

**DEFENDANTS’ ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES**

Defendants Jessica K. Altman, as Rehabilitator of Senior Health Insurance Company of Pennsylvania (the “Rehabilitator”), Patrick H. Cantilo, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania (the “Special Deputy Rehabilitator”), and Senior Health Insurance Company of Pennsylvania (“SHIP”) (collectively “Defendants”), by and through its undersigned counsel, hereby provide the following answers to Local Rule 26.01 Interrogatories:

**(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.**

**ANSWER:** None.

**(B) As to each claim, state whether it should be tried jury or nonjury and why.**

**ANSWER:** Without waiving any defenses, the matter should be tried by nonjury because—to the extent there is an actual case or controversy, and the Court concludes it is otherwise appropriate to exercise jurisdiction—the matter involves questions of law.

**(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party’s stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.**

**ANSWER:** None.

**(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).**

**ANSWER:** This is a removal action. Without waiving any jurisdictional defenses, the Columbia Division is the proper division because Plaintiffs filed this civil action in the Court of Common Pleas for the Fifth Judicial Circuit, Richland County, a court located within the jurisdictional boundaries of the Columbia Division. Additionally, upon information and belief, Plaintiffs are residents of the Columbia Division.

**(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal?**

**ANSWER:** Defendants are not aware of any other matter filed in this district, whether civil or criminal, that this matter relates to.

(F) [*Defendants only.*] **If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.**

**ANSWER:** Without waiving any defenses, Defendants have been properly identified in this matter.

(G) [*Defendants only.*] **If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.**

**ANSWER:** Defendants are not aware of any other persons or entities that may be liable to it in this matter.

Respectfully submitted this 11th day of January, 2021.

COZEN O'CONNOR

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Insurance Commissioner of the  
Commonwealth of Pennsylvania, as  
Statutory Rehabilitator for Senior Health  
Insurance Company of Pennsylvania,  
Patrick H. Cantilo, as Special Deputy  
Rehabilitator of Senior Health Insurance  
Company of Pennsylvania, and Senior  
Health Insurance Company of Pennsylvania*