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1 SHP 2020

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In Re: Senior Health Insurance Company of Pennsylvania in Rehabilitation	:	No. 1 SHP 2020

O R D E R

AND NOW, this ___ day of _____, 2020, upon consideration of the Unopposed Application to Intervene of Transamerica Life Insurance Company ("Transamerica") and the Rehabilitator's response thereto, it is hereby ORDERED that Transamerica is permitted to intervene to participate in the activity set forth in the Court's June 12, 2020 Case Management Order.

BY THE COURT:

_____
MARY HANNAH LEAVITT
President Judge

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In Re: Senior Health Insurance Company of Pennsylvania in Rehabilitation	: : :	No. 1 SHP 2020

RESPONSE OF THE REHABILITATOR TO THE UNOPPOSED APPLICATION TO INTERVENE OF TRANSAMERICA LIFE INSURANCE COMPANY

Jessica K. Altman, Insurance Commissioner of the Commonwealth of Pennsylvania, in her capacity as Statutory Rehabilitator of Senior Health Insurance Company of Pennsylvania ("SHIP"), responds to the Unopposed Application to Intervene of Transamerica Life Insurance Company ("Transamerica"). For the reasons and to the extent stated herein, the Rehabilitator does not oppose Transamerica's application to intervene to participate in the activity set forth in the Court's June 12, 2020 Case Management Order. The Rehabilitator does not consent to intervention for any other purposes. Below are the Rehabilitator's responses to the allegations in the Application:

1. Admitted.

2. Admitted.

3. Admitted.

4. It is admitted that SHIP reinsures and administers certain policies of insurance issued by Transamerica or its predecessors.

5. To the extent the allegations in Paragraph 5 seek to paraphrase or characterize the contents of a written document, the document speaks for itself. The allegations in Paragraph 5 are denied to the extent they are inconsistent with that document. To the extent a response is required, it is admitted only that the Proposed Rehabilitation Plan references certain Transamerica policies reinsured and administered by SHIP. It is denied that the Proposed Rehabilitation Plan addresses SHIP's obligations with respect to those policies in the context of Rehabilitation.

6. The Rehabilitator is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 6, and therefore they are deemed denied. By way of further answer, the allegations in Paragraph 6 are denied as stated. The Rehabilitator does not object to Transamerica's application to intervene to participate in the activity set forth in the Court's June 12, 2020 Case Management Order. The Rehabilitator does not consent to intervention for any other purposes, and denies that Transamerica's intervention is "necessary" for any reason.

7. The allegations in Paragraph 7 are legal conclusions to which no answer is required. By way of further answer, the Rehabilitator does not object to Transamerica's application to intervene to participate in the activity set forth in the

Court's June 12, 2020 Case Management Order. The Rehabilitator does not consent to intervention for any other purposes.

8. The allegations in Paragraph 8 are legal conclusions to which no answer is required. By way of further answer, the Rehabilitator does not object to Transamerica's application to intervene to participate in the activity set forth in the Court's June 12, 2020 Case Management Order. The Rehabilitator does not consent to intervention for any other purposes.

9. It is admitted that the Rehabilitator does not object to Transamerica's application to intervene to participate in the activity set forth in the Court's June 12, 2020 Case Management Order. The Rehabilitator does not consent to intervention for any other purposes.

WHEREFORE, the Rehabilitator does not object to Transamerica Life Insurance Company's intervention in the above-captioned matter.

Respectfully submitted,

/s/ Dexter R. Hamilton

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CERTIFICATE OF SERVICE

I, Michael J. Broadbent, hereby certify that on August 21, 2020 I served the foregoing Response on all parties listed on the Master Service List by electronic mail and that an electronic copy of the foregoing document will be posted on SHIP's website at https://www.shipltc.com/court-documents.

/s/ Michael J. Broadbent