

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

No. 1 SHP 2020

**JESSICA K. ALTMAN, INSURANCE COMMISSIONER
OF THE COMMONWEALTH OF PENNSYLVANIA,**

Petitioner,

v.

SENIOR HEALTH INSURANCE COMPANY OF PENNSYLVANIA,

Respondent.

Application for Approval of Plan of Rehabilitation

**RESPONSE OF TRANSAMERICA LIFE INSURANCE COMPANY
TO PROPOSED PLAN OF REHABILITATION**

**SAUL EWING ARNSTEIN &
LEHR LLP**

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Pursuant to Paragraph 9 of this Court’s June 12, 2020 Case Management Order for Comments and Hearing on the Proposed Plan of Rehabilitation¹, Transamerica Life Insurance Company (“Transamerica”), through its undersigned counsel, hereby submits this Response to the Application for Approval of the Plan of Rehabilitation for Senior Health Insurance Company of Pennsylvania (“SHIP”) in Rehabilitation (the “Proposed Rehabilitation Plan”):

1. On January 23, 2020, Jessica K. Altman, Insurance Commissioner of the Commonwealth of Pennsylvania (the “Commissioner”) filed an Application for Order Placing Senior Health Insurance Company of Pennsylvania in Rehabilitation (the “Petition for Rehabilitation”).

2. On January 29, 2020, the Court granted the Petition for Rehabilitation. Effective January 29, 2020, SHIP was placed into rehabilitation in accordance with 40 P.S. §§ 221.1-221.63. The Commissioner was appointed rehabilitator of SHIP (the “Rehabilitator”) and directed to rehabilitate the business of SHIP, take

¹ Paragraph 8 provides, in relevant part, that “Formal Comments in support of or in objection to the proposed Plan of Rehabilitation shall be filed with the Court on or before September 15, 2020. . . . Formal Comments shall state with specificity the Commenter’s identity and interest in the proceeding, the facts on which the comments are based, and any suggested modifications to the proposed Plan of Rehabilitation. A person may submit Formal Comments without participating in the hearing on the proposed Plan of Rehabilitation. A Commenter who intends to participate in the hearing must notify the Court of that intention in his Formal Comments.”

possession of the assets of SHIP and to administer the assets of SHIP in accordance with the Court's Order.

3. On April 22, 2020, the Commissioner filed an Application for Approval of the Plan of Rehabilitation for SHIP, along with the Proposed Rehabilitation Plan.

4. Transamerica understands that the Rehabilitator intends to file an amended Plan of Rehabilitation that includes changes to the manner in which SHIP's liabilities and obligations concerning certain Transamerica policies reinsured and administered by SHIP ("Assumed Liabilities") are addressed. Transamerica reserves all rights to comment on or object to any aspect of the proposed amended Plan of Rehabilitation in whatever form is current as of any hearing on the proposed Plan.

Respectfully submitted,

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Dated: September 14, 2020

PROOF OF SERVICE

I hereby certify that a copy of the foregoing was served by electronic transmission by PacFile and upon the email addresses shown on the docket as follows:

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