

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

In the Matter of the Rehabilitation of
The Home Insurance Company.

Docket No. 03-E-106

In the Matter of the Rehabilitation of
US International Reinsurance Company.

Docket No. 03-E-___

MOTION FOR ORDER DIRECTING JOINT ADMINISTRATION

Paula T. Rogers, Commissioner of the State of New Hampshire Insurance Department and the court appointed Rehabilitator of US International Reinsurance Company ("USI Re") and the Home Insurance Company, Inc. ("The Home") in the above-captioned cases (the "Rehabilitator"), by her attorneys, the Office of the Attorney General, hereby moves the Court for entry of an order directing joint administration of the above-captioned cases. In support hereof, the Rehabilitator respectfully represents as follows:

1. By this Motion, the Rehabilitator seeks entry of an order directing joint administration of these rehabilitation cases for procedural purposes only.
2. The Rehabilitator believes that the joint administration of these rehabilitation cases is warranted by the fact that the financial affairs and business operations of The Home and USI Re are closely related. Entry of an order directing joint administration of these cases will obviate the need for duplicative notices, applications and orders, and will thereby save

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considerable time and expense for the Rehabilitator and result in substantial savings to The Home and USI Re.

3. The rights of the respective policy-holders and creditors of The Home and USI Re will not be adversely affected by joint administration of these cases because this Motion requests only administration consolidation of the cases and the Rehabilitator is not at this time seeking substantive consolidation. The rights of all policyholders and creditors will be enhanced by the reduced costs resulting from joint administration. This Court will be relieved of the burden of entering duplicative orders and maintaining duplicative files.

4. By reason of the foregoing, the interests of The Home and USI Re and their policyholders and creditors would be best served by joint administration of the above-captioned cases. Accordingly, the Rehabilitator requests that the caption of these cases be modified to reflect the joint administration of the rehabilitation cases, as follows:

In re:)	
)	
The Home Insurance Company, Inc.)	Case No. 03-E-106 and 03-E-_____
)	(Jointly Administered)
)	

5. The Rehabilitator also seeks the Court's direction that a notation substantially similar to the following notation be entered on the docket of each of the cases to reflect the joint administration of the cases:

"An Order had been entered in this case directing the procedural consolidation and joint administration of the rehabilitation cases of The Home Insurance Company, Inc. and its affiliates, and the docket in Case No. 03-E-106 (should be consulted for all matters affecting this case.)"

WHEREFORE, the Rehabilitator respectfully requests that the Court grant this Motion in all respects and grant such other and further relief as is just and proper.

Dated: March 12, 2003

Respectfully submitted,

PAULA T. ROGERS, COMMISSIONER
THE STATE OF NEW HAMPSHIRE
DEPARTMENT OF INSURANCE

By her attorneys,

PETER W. HEED
ATTORNEY GENERAL

Dated: March 13, 2003

By: *Peter C. Roth*
Peter C.L. Roth
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CERTIFICATE OF SERVICE

I, Peter C.L. Roth, do hereby certify that on March 13, 2003 I served a true copy of the foregoing motion upon Martin Honigberg, Esq, Sulloway & Hollis, 9 Capitol Street, Concord, NH 03301, by first class mail, postage prepaid.

Dated: March 13, 2003



Peter C.L. Roth

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