

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

Docket No. 03-E-0106

In the Matter of the Liquidation of
The Home Insurance Company

**MOTION OF JOINT PROVISIONAL LIQUIDATOR
TO ADMIT COUNSEL PRO HAC VICE**

The non-party Gareth Howard Hughes, as Joint Provisional Liquidator of The Home Insurance Company (“Joint Provisional Liquidator”), by and through his attorneys, Rackemann, Sawyer & Brewster, P.C., and pursuant to Superior Court Rule 19, hereby moves for admission pro hac vice of attorneys J. David Leslie and Eric A. Smith to specially appear and practice before this Court in the above-captioned proceeding for the Joint Provisional Liquidator. In support of this motion, the Joint Provisional Liquidator states as follows:

1. Attached hereto in support of this motion are the Affidavits of J. David Leslie and Eric A. Smith of the law firm of Rackemann, Sawyer & Brewster, P.C., One Financial Center, Boston, Massachusetts 02111, telephone number (617) 542-3200.
2. The Joint Provisional Liquidator’s address and phone number are: Gareth Howard Hughes, Ernst & Young, LLP, One More London Place, London SE1 2AF United Kingdom and 44 20 7951 2000.
3. As stated in the attached Affidavits, attorneys Leslie and Smith are members in good standing of the Bar of the Commonwealth of Massachusetts as well as other states and federal courts (listed in their Affidavits) and are not, nor have ever been, the subject of any formal, written disciplinary proceeding before any of the bars or courts to which they have been admitted, and otherwise meet the requirements of Superior Court Rule 19.

GRANTED.
Rackemann
3/24/05

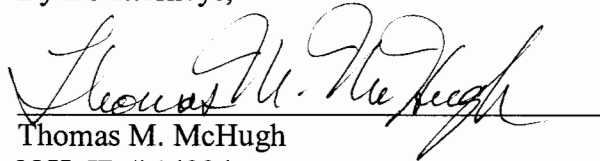
4. The undersigned counsel will remain associated with attorneys Leslie and Smith throughout the pendency of this proceeding and will be present at any hearing in this matter involving the Joint Provisional Liquidator unless the Court excuses such attendance prior to the hearing.

WHEREFORE, the Joint Provisional Liquidator respectfully requests that this Court enter an order permitting attorneys Leslie and Smith to appear and practice before the Court on behalf of the Joint Provisional Liquidator in this proceeding.

Respectfully submitted,

GARETH HOWARD HUGHES, AS JOINT
PROVISIONAL LIQUIDATOR OF THE HOME
INSURANCE COMPANY,

By his attorneys,

A handwritten signature in cursive script, appearing to read "Thomas M. McHugh", is written over a horizontal line.

Thomas M. McHugh

N.H. ID # 14224

Rackemann, Sawyer & Brewster, P.C.

One Financial Center

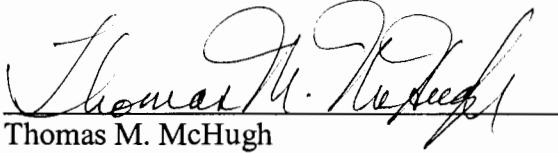
Boston, MA 02111

(617) 542-2300

Dated: March 30, 2005

Certificate of Service

I hereby certify that a copy of the foregoing Motion of Joint Provisional Liquidator to Admit Counsel Pro Hac Vice was sent, this 30th day of March, 2005, by first class mail, postage prepaid to all persons on the attached service list.


Thomas M. McHugh

THE STATE OF NEW HAMPSHIRE

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