

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**

**LIQUIDATOR'S MOTION TO PLACE CONFIDENTIAL AFFIDAVIT IN
SUPPORT OF MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT
WITH WÜSTENROT & WÜRTEMBERGISCHE AG
("WÜRTEMBERGISCHE") UNDER SEAL**

NOW COMES Roger A. Sevigny, Commissioner of Insurance for the State of New Hampshire, as Liquidator ("Liquidator") of The Home Insurance Company ("Home"), and moves to place the Confidential Affidavit of Jonathan Rosen and its exhibits ("Confidential Affidavit"), filed in support of the Liquidator's Motion for Approval of Settlement Agreement with Württembergische ("Motion for Approval"), under seal. As reasons therefore, the Liquidator respectfully states:

1. Concurrent with this motion, the Liquidator files his Motion for Approval with this Court. The proposed Settlement Agreement with Württembergische ("Agreement") is Exhibit A to the Confidential Affidavit.
2. Württembergische has asserted that it is critical to its business interests that the Agreement be held confidential and should not be disclosed by the Motion for Approval or the Confidential Affidavit since to do so would be adverse to its position with other Ruddy Pool members. The Agreement provides that it is confidential but that it is subject to approval of the Court and that it may be disclosed to the Court.

3. In view of Württembergische's assertion, the provisions of the Agreement, and in furtherance of the effort to amicably resolve issues with Württembergische, the Liquidator requests that the Confidential Affidavit and its exhibits be placed under seal.

WHEREFORE, the Liquidator respectfully requests that the Court:

- A. Grant this Motion to Place Confidential Affidavit in Support of Motion for Approval of Settlement Agreement with Wüstenrot & Württembergische AG Under Seal;
- B. Enter an Order in the form submitted herewith placing under seal the Confidential Affidavit of Jonathan Rosen and its exhibits; and
- C. Grant such other and further relief as justice may require.

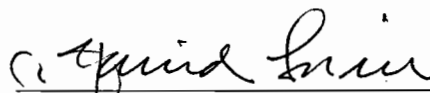
Respectfully submitted,

ROGER A. SEVIGNY, COMMISSIONER OF
INSURANCE OF THE STATE OF NEW HAMPSHIRE
SOLELY AS LIQUIDATOR OF THE HOME
INSURANCE COMPANY,

By his attorneys,

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March 1, 2006

Certificate of Service

I hereby certify that a copy of the foregoing Liquidator's Motion to Place Confidential Affidavit in Support of Settlement Agreement with Wüstenrot & Württembergische AG Under Seal and the Proposed Order granting this motion were sent, this 1st day of March, 2006, by first class mail, postage prepaid to all persons on the attached service list.



J. David Leslie

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

In the Matter of the Liquidation of
The Home Insurance Company
Docket No. 03-E-0106

In the Matter of the Liquidation of
US International Reinsurance Company
Docket No. 03-E-0112

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