

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

Docket No. 03-E-0112

**In the Matter of the Liquidation of
US International Reinsurance Company**

**LIQUIDATOR'S MOTION TO PLACE CONFIDENTIAL AFFIDAVIT
CONCERNING SHARE ACQUISITION AGREEMENT WITH
COBEX INVESTMENTS LIMITED UNDER SEAL**

NOW COMES Roger A. Sevigny, Commissioner of Insurance for the State of New Hampshire, as Liquidator ("Liquidator") of US International Reinsurance Company ("USI Re"), and moves that the Court place the Confidential Affidavit of Peter A. Bengelsdorf, Special Deputy Liquidator, in Support of Approval of Share Acquisition Agreement with Cobex Investments Limited (the "Confidential Affidavit") under seal. As reasons therefor, the Liquidator respectfully states:

1. Concurrent with this motion, the Liquidator files the Liquidator's Motion for Approval of Share Acquisition Agreement with Cobex Investments Limited (the "Motion"). A redacted version of the Share Acquisition Agreement ("Agreement") with Cobex Investments Limited ("Cobex"), with the financial terms redacted, is attached to the Motion.

2. The Confidential Affidavit identifies the financial terms of the Agreement for the sale of City International Insurance Company Limited ("City"). The complete Agreement, including its financial terms, is attached to the Confidential Affidavit. The financial terms of the Agreement are confidential to the parties, and disclosure of those terms would potentially adversely affect their positions with respect to future transactions.

3. The Confidential Affidavit also explains the Liquidator's decision to enter the Agreement. Revealing the Liquidator's approach and the financial terms of the Agreement would potentially adversely affect the Liquidator's ability to negotiate a new sale of City in the event the Agreement were not approved by this Court or the purchaser were not approved by the Financial Services Authority.

WHEREFORE, the Liquidator respectfully requests that this Court:

- A. Grant this Motion To Place Confidential Affidavit Concerning Share Acquisition Agreement With Cobex Investments Limited Under Seal;
- B. Enter an Order in the form submitted herewith placing the Confidential Affidavit under seal; and
- C. Grant such other and further relief as justice may require.

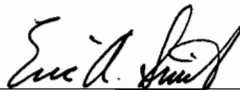
Respectfully submitted,

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

By his attorneys,

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July 21, 2006

Certificate of Service

As no one other than counsel for the Liquidator has appeared in this proceeding (No. 03-E-0112), there are no persons on whom to serve this motion.



Eric A. Smith