

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 FOR EXTENSION OF TIME TO RESPOND TO
LIQUIDATOR'S MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT WITH
CLEAVER-BROOKS AND COCA COLA**

Century Indemnity Company, ACE Property and Casualty Insurance Company, Pacific Employers Insurance Company and ACE American Reinsurance Company (collectively, the "ACE Companies"), by their attorneys, Orr & Reno P.A., respectfully submit this motion for extension of time because they have been unable to determine if they have standing to object to the Liquidator's Motion for Approval of Settlement Agreement with Cleaver-Brooks and Coca Cola. ACE Companies further state:

1. The Liquidator filed a motion on March 30, 2007, seeking approval to resolve certain claims with Cleaver-Brooks and Coca Cola for \$74,000,000.
2. ACE Companies is attempting to determine if it is the reinsurer on this claim to determine if it has standing to object to this settlement, but have not yet been able to verify this. If it is the reinsurer, ACE Companies would like the opportunity to challenge the amount of the settlement, particularly given its magnitude.
3. ACE Companies is therefore requesting a one week extension of time to respond to the Liquidator's motion.
4. ACE Companies attempted to contact Liquidator's counsel to seek concurrence on this motion, but he could not be reached prior to filing this motion.

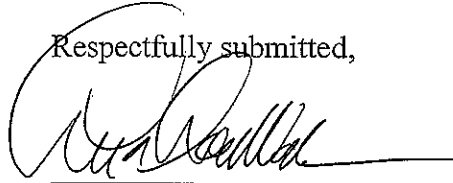
WHEREFORE, the ACE Companies respectfully request that the Court:

A. Grant it a one week extension (to April 16, 2007) to object to the proposed settlement agreement with Cleaver-Brooks and Coca Cola; and

B. Grant such further relief as the Court deems just.

Dated: April 9, 2007

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned certify that a copy of the foregoing document has been served on Roger A. Sevigny, Commissioner of Insurance, Peter Bengelsdorf, Special Deputy, and the following counsel via First Class mail on April 9, 2007:

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