

1 This was the source of the Liquidator's contention the Claimant has been paid
2 \$12,500. He left out the \$100,000, and the others moneys that attorney claimed for
3 herself, without authorization. This was the \$100,000 that the Home Insurance
4 Company and its attorney agreed to pay Attorney Georgia Ann Michell-Langsam, for
5 settling the personal injury lawsuit for them. Claimant can affirmatively state, under
6 oath that not one penny of these moneys has been paid to him, up till today.
7

8 Finally, guess, who funded the defense of that action? The same Home Insurance
9 Company that issued the settlement check to the attorney in the underlying action!
10 Guess whom The Home Insurance hired to initially represent the attorney in the
11 subsequent legal malpractice action? The underlying personal injury Defendants'
12 attorneys, who gave her the check! Actual conflict of interest!
13

14 II 15 Perfection Of Appeal

16 Yes, it is true that Claimant served a Notice of Appeal on December 23, 2011. It is
17 yet to be perfected in the New Hampshire Supreme Court. Parties are yet to be issued a
18 case number, and an acceptance Order by the Supreme Court. No Brief and Index has
19 been filed by the parties. Nothing has been scheduled by the Supreme Court.
20

21 This Court is still with jurisdiction, pending the completion of the foregoing.
22 Please see Rautenberg v Munnis, et al (1966) 107 N.H. 446.

23 III 24 Timeliness Of Liquidator's Response To Claimant's Objection

25 The Rules of Superior Court of the State of New Hampshire, Rule 59A(2)
provides that the Liquidator is not required to respond to Claimant's Objection, but if


1 he so chooses, the response must be filed within ten days of the Objection notice, not the
2 date it was filed.

3 The Objection notice was served on December 23, 2011. Ten days thereafter will
4 be January 2, 2011. The Liquidator's Response was served on January 5, 2012. The time
5 has expired for this response to be filed. Not that it matters in this proceeding.
6

7 **IV**
8 **Absence Of Liquidator's Substantive Response**

9 The Liquidator does not need an Order from this Court to file a substantive
10 response to the Claimant's Objection, unless he has none. After all, he chose to file the
11 procedural response, without the substantial one.

12 Dated: January 7, 2012

13 
14 Adebawale O. Osijo, MBA.
15 Claimant Pro Se
16
17
18
19
20
21
22
23
24
25

1 Proof Of Service By Mail

2 I, Jhoe F. Ajayi, declare the followings:

3 I. I am not a party in this action, nor do I have any interest in its outcome.
4 I am over the age of eighteen years. I am a resident of the City and County of Fresno,
5 California. I served copies of the following document:

6 **REPLY TO LIQUIDATOR'S RESPONSE TO OBJECTION TO THE ORDER OF**
7 **DECEMBER 16, 2011**

8 on the following persons:

9 Mr. William S. McGraw, Esq.
10 Clerk
11 Merrimack County Superior Court
12 163 North Main Street
13 Concord, New Hampshire 03301
14 **Court of Jurisdiction**

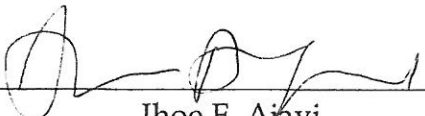
Mr. Erik Smith
Rackemann, Sawyer & Brewster
A Professional Corporation
160 Federal Street
Boston, Massachusetts 02110
Attorneys for Liquidator

13 **Office of the Attorney General**
14 Attention: Home Insurance In Liquidation
15 Department of Justice
16 33 Capitol Street
17 Concord, New Hampshire 03301

Ms. Melinda Gehris
Hess Gehris Solution
501 Hall Streets
Bow, New Hampshire 03304
Referee

18 by placing the documents in envelopes, with prepaid stamps affixed on them. I
19 thereafter sealed the envelopes and deposited them with the United States Postal
20 Service, for delivery at the respective addresses.

21 II. I make this declaration of Oath under the penalty of perjury, and
22 according to the laws in the State of California that the foregoing is true and correct. It is
23 executed in the City and County of Fresno, California this 7th day of January, in the year
24 2012.

25


Jhoe F. Ajayi
2015 East Pontiac Way, Suite 209
Fresno, California 93726