

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

Docket No. 217-2003-EQ-00106

In the Matter of the Liquidation of  
The Home Insurance Company

**LIQUIDATOR'S AND BRIDGESTONE'S NOTICE OF AGREEMENT IN PRINCIPLE  
AND JOINT MOTION FOR STAY OF PROCEEDINGS ON MOTION TO RECOMMIT**

John R. Elias, New Hampshire Insurance Commissioner, as Liquidator ("Liquidator") of The Home Insurance Company ("Home"), and claimant Bridgestone Americas Tire Operations, LLC ("Bridgestone"), hereby request that the Court stay proceedings regarding Bridgestone's Objections to Referee's Report on the Issue of the Number of Occurrences and Motion to Recommit to the Referee for Further Proceedings (filed November 21, 2018) (the "Motion to Recommit"). As grounds therefor, the Liquidator and Bridgestone state:

Bridgestone filed the Motion to Recommit with respect to the Referee's Order on Number of Occurrence in 2015-HICIL-60. The Motion to Recommit has been fully briefed.

The Liquidator and Bridgestone have reached an agreement in principle to resolve Bridgestone's claim, subject to mutually acceptable documentation and approval by the Court.

In order to allow time to prepare settlement documentation and then for the Liquidator to submit a motion for approval of the settlement, the Liquidator and Bridgestone request that the Court stay proceedings on the Motion to Recommit.

The parties anticipate that it will be possible to file a motion for approval of settlement in the next ten days. If the settlement is not finalized, the parties will promptly notify the Court.

WHEREFORE, the Liquidator and Bridgestone request that the Court stay proceedings on the Motion to Recommit pending its decision on the forthcoming motion for approval of settlement or further notice from the parties.

Respectfully submitted,

JOHN R. ELIAS, INSURANCE COMMISSIONER OF  
THE STATE OF NEW HAMPSHIRE, AS LIQUIDATOR  
OF THE HOME INSURANCE COMPANY,  
By his attorneys,

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June 6, 2019

### Certificate of Service

I hereby certify that the foregoing notice and motion was served by email on counsel for Bridgestone Americas Tire Operations, LLC this 6<sup>th</sup> day of June 2019 and by mail on counsel on the attached service list this 6<sup>th</sup> th day of June 2019.



Eric A. Smith

THE STATE OF NEW HAMPSHIRE

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