

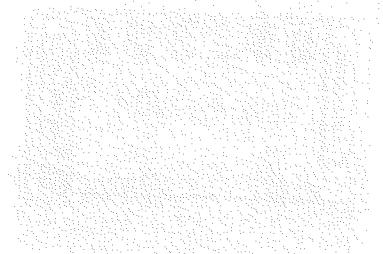
Catalina Services UK Limited

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14 November 2019

The Clerk  
Merrimack County Superior Court  
163, North Main Street  
Concord  
New Hampshire 03301



Dear Sirs,

**Re: In the matter of the Liquidation of The Home Insurance Company, Docket number: 217-2003-EQ -00106**

**Objection to Liquidator's Motion for Approval of Claim Amendment Deadline.**

Please note that this objection is sent for and on behalf of Catalina Group Companies with interest in Home Insurance Company liquidation:

Catalina London Limited on its own behalf and as successor to KX Reinsurance Company Limited;

Catalina Worthing Insurance Limited as successor to L&E Insurance Company Limited

Catalina Worthing Insurance Limited as successor to Excess Insurance Company Limited

Please note our objection to the motion on the grounds that:

- There is insufficient information to enable us to ensure that Catalina's legitimate interests are protected by this motion.
- The Catalina companies have long tail liabilities which are ceded as reinsurance claims to the Home. The application of a cut off will prohibit the Catalina companies from recovering any element of the reinsurance which they paid for in respect of claims which have not as yet been reported, IBNR.
- By denying creditors the ability to include IBNR in their amended claim submission, CISUK formally AISUK will receive a windfall benefit at the expense of Home's Creditors, as a reduced value of reinsurance recoveries will be available for a dividend distribution.
- The amount of paperwork required in the Motion to support Creditor's claims is unnecessary, burdensome and will impose additional costs on all Creditors.
- It is not clear who will be undertaking claims handling in the future, which could lead to delays, an increased likelihood of any claims decision being queried and therefore increased costs to the Estate.

- The handling of claims which have been notified in advance of the proposed cut off but which continue to develop thereafter is unclear, IBNER claims.

Yours faithfully,



Roland Jackson  
Chief Executive Officer, director  
Catalina London Limited,  
Catalina Worthing Insurance Limited

Email: rolandjackson@catalinare.com

Cc Catalina have today sent, by mail, copies of this objection to:

J. Christopher Marshall  
Civil Bureau, New Hampshire Department of Justice  
33 Capitol Street  
Concord NH 03301-6397

J. David Leslie/Eric A. Smith  
Rackemann, Sawyer & Brewster  
160 Federal Street  
Boston MA 02110-1700