

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**

**MOTION FOR LEAVE TO FILE A SUPPLEMENTAL OBJECTION TO
LIQUIDATOR'S MOTION FOR APPROVAL OF CLAIM AMENDMENT DEADLINE**

Indemnity Marine Assurance Co., Nederlandse Reassurantie Groep NV, NRG Victory Reinsurance Limited, NRG Fenchurch Insurance Company Ltd, New Zealand Reinsurance Company, Tenecom Limited, Underwriters at Lloyd's of London, Winterhur Swiss Ins. Co., and World Auxiliary Corp. Ltd. (together, the "Objectors"), by and through their attorneys, move this Court for leave to file a supplement to their Objection To The Liquidator's Motion For Approval Of Claim Amendment Deadline ("Objection") respecting the Insurance Commissioner of the State of New Hampshire's (the "Liquidator's") Motion for Approval of Claim Amendment Deadline ("Motion"). In support of this motion, the Objectors state as follows:

1. The deadline to object to the Motion is today, November 18, 2019.
2. The Objectors have previously communicated with the Liquidator's representatives in an attempt to address the Objectors' concerns regarding the Claim Amendment Deadline proposed in the Motion.
3. Objectors were hopeful that their concerns would be heard and that the Liquidator would voluntarily amend the relief requested in the Motion, but such agreement was not reached. Consequently, it became apparent that a formal objection would need to be filed.

4. The Objectors, through recently retained counsel, requested an extension of time to respond to the Motion, but Liquidator's counsel refused to provide the requested extension.

5. Given the deadline, Objectors have timely filed an Objection simultaneously herewith but would like the opportunity to supplement that Objection, if necessary.

6. Undersigned counsel has only recently been retained in this matter and needs additional time to review the case records, gather facts, and study whether any further arguments should be presented to the Court in connection with the Objection.

7. The Objectors request a limited extension of time (one week), until November 25, 2019, within which to supplement, if necessary, their Objection.

8. Granting this limited extension will not disturb the procedural schedule in this case and will not materially impact the Liquidator's efforts to respond to the Objection.

9. Given that U.S. counsel has only recently been retained for the Objectors, whose business is managed out of the United Kingdom, and that the Liquidator declined to extend the deadline for filing the Objection, a short period of time within which to file a supplement to the Objection (if necessary) is appropriate and reasonable.

10. Counsel for the Objectors did not seek further assent from any of the other parties in this case because the relief sought in this motion is requested for the Objectors only.

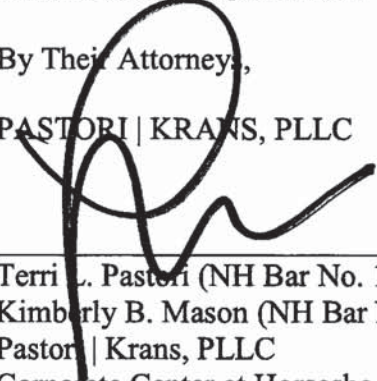
WHEREFORE, the Objectors respectfully request that this Court: (a) allow the Objectors leave to file a supplement to their Objection, if necessary, on or before November 25, 2019; and (b) grant the Objectors such further relief as the Court deems just and reasonable.

Respectfully submitted,

INDEMNITY MARINE ASSURANCE CO.,
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NRG VICTORY REINSURANCE LIMITED,
NRG FENCHURCH INSURANCE COMPANY
LTD, NEW ZEALAND REINSURANCE
COMPANY, TENECOM LIMITED,
UNDERWRITERS AT LLOYD'S OF
LONDON, WINTERHUR SWISS INS. CO.,
AND WORLD AUXILIARY CORP. LTD.

By Their Attorney,

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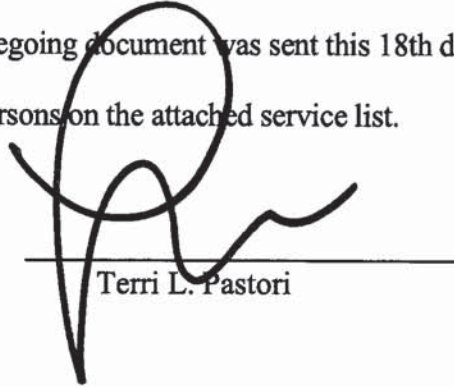
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Dated: November 18, 2019

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was sent this 18th day of November 2019 by First-Class Mail to all persons on the attached service list.



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