

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 MOTION TO FILE LIQUIDATOR'S OBJECTION
TO BRIDGESTONE'S MOTION TO RECOMMIT AND
LIQUIDATOR'S APPENDIX UNDER SEAL**

John R. Elias, Insurance Commissioner of the State of New Hampshire, as Liquidator ("Liquidator") of The Home Insurance Company ("Home"), moves that the Court grant leave to file under seal the Liquidator's Objection to Bridgestone's Motion to Recommit and the Liquidator's Appendix. As reasons therefor, the Liquidator states as follows:

1. Claimant Bridgestone Americas Tire Operations, LLC ("Bridgestone") filed its Objections to Referee's September 10, 2018 Report and Motion to Recommit ("Motion to Recommit") and the Appendix to Bridgestone's Motion to Recommit on November 16, 2018.
2. That same day, Bridgestone filed an assented to motion for leave to file its Motion to Recommit and its Appendix under seal. The motion stated that the Motion to Recommit and Appendix contained information that is confidential under the Stipulation and Order Governing Confidentiality of Documents approved by the Referee in the disputed claim proceeding, 2015-HICIL-60, on December 17, 2015.
3. The Court granted the motion for leave to file Bridgestone's Motion to Recommit and Appendix under seal on November 19, 2018.
4. The Liquidator's Objection to Bridgestone's Motion to Recommit and the Liquidator's Appendix also contain information that is confidential and was filed under seal in the disputed claim proceeding pursuant to the Stipulation and Order approved by the Referee.

5. Accordingly, the Liquidator moves for leave to file the Liquidator's Objection and the Liquidator's Appendix under seal to preserve the confidentiality of the confidential information contained therein.

6. Counsel for the Liquidator has conferred with counsel for Bridgestone, and Bridgestone assents to this motion.

WHEREFORE, the Liquidator respectfully requests that this Court grant this motion and file the Liquidator's Objection and the Liquidator's Appendix under seal.

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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January 14, 2019

Certificate of Service

I hereby certify that a copy of the foregoing Liquidator's Motion to File Objection to Bridgestone's Motion to Recommit and Liquidator's Appendix Under Seal was sent this 14th day of January 2019, by first class mail, postage prepaid to all persons on the attached service list.



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