

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 TO FILE UNDER SEAL EXHIBITS D, F, G, AND H OF ZURICH
INSURANCE PLC, GERMAN BRANCH AND WÜRTTEMBERGISCHE
VERSICHERUNG AG'S OBJECTION TO THE LIQUIDATOR'S MOTION FOR
APPROVAL OF CLAIM AMENDMENT DEADLINE**

Zurich Insurance plc, German Branch and Württembergische Versicherung AG (“Objecting Creditors”), by and through their New Hampshire counsel, McLane Middleton, Professional Association, respectfully move this Court for an order filing under seal Exhibits D, F, G and H of the Objecting Creditors’ November 18, 2019 Objection to the Liquidator’s Motion for Approval of Claim Amendment Deadline (the “Objection”). In support of this Motion, the Objecting Creditors state as follows:

1. This matter involves the liquidation of The Home Insurance Company (“The Home”).
2. In the course of this proceeding, the Objecting Creditors and other AFIA Cedents entered into a scheme of arrangement with The Home, which created a means of securing the Liquidator’s recovery of reinsurance of the AFIA Cedents’ claims from The Home’s reinsurers (hereinafter, the “Scheme”).
3. On November 18, 2019, the Objecting Creditors filed their Objection and its corresponding exhibits with this Court.

GRANTED


JOHN C. KISSINGER, JR.
PRESIDING JUSTICE

2/28/2020