

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

**BEFORE THE COURT-APPOINTED REFEREE
IN RE THE LIQUIDATION OF THE HOME INSURANCE COMPANY
DISPUTED CLAIMS DOCKET**

In Re Liquidator Number: 2015-HICIL-60
Proof of Claim Number: INSU240739-01
**Claimant Name: Bridgestone Americas Tire
Operations, LLC**

PROPOSED AGREED-TO DISCOVERY SCHEDULE

In accordance with the Notice of Telephonic Structuring Conference dated February 3, 2016, counsel for Roger A. Sevigny, Insurance Commissioner for the State of New Hampshire, as Liquidator ("Liquidator") of The Home Insurance Company, and counsel for Bridgestone Americas Tire Operations, LLC ("Bridgestone") have conferred and propose the following proposed agreed-to discovery schedule should the case be bifurcated as requested:

1. Initial written discovery requests (requests for production of documents and interrogatories) due March 4, 2016
2. Responses to written discovery requests due in accordance with the timetables in the Superior Court Rules
3. Document and interrogatory discovery to be completed by July 15, 2016.
4. Depositions to be completed by August 12, 2016
5. Bridgestone's Section 15 Submission due September 16, 2016
6. Liquidator's Section 15 Submission due October 14, 2016
7. Bridgestone's reply due October 28, 2016
8. Argument after November 7, 2016

Respectfully submitted

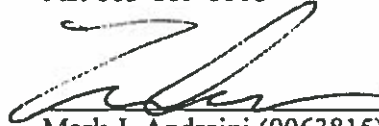
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February 12, 2016