

STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

BEFORE THE COURT APPOINTED REFEREE

In the Matter of the Liquidation of The Home Insurance Company
Disputed Claims Docket

In Re Liquidator No.: 2013-HICIL-56

Claimant: Flexible Products Company

Claimant No.: INSU389339-01

**ASSENTED-TO MOTION TO EXTEND TIME TO FILE MANDATORY
DISCLOSURES TO AND INCLUDING APRIL 5, 2013**

Flexible Products Company moves, with the assent of the Liquidator, to extend the deadline for Flexible to file its Mandatory Disclosures pursuant to Paragraph 14(b) of the Claims Procedure Order dated January 19, 2005 **to and including April 5, 2013**, saying:

1. In the first week of February, 2013, Flexible received the Liquidator's "Case File" pursuant to Paragraph 14(b) of the Claims Procedure Order dated January 19, 2005. Pursuant to that Order, Flexible is required to submit its "Mandatory Disclosures" within 30 days, or in the first week of March, 2013.
2. Upon review of this matter, Flexible has determined that in order to provide a meaningful disclosure, it requires additional time.
3. Marc Rosenthal, lead counsel for Flexible, has spoken with Eric Smith, counsel for the Liquidator and obtained his consent to an extension of time to and including April 5, 2013.

4. This extension will not prejudice any party or delay any scheduled matters.

5. No memorandum is necessary in support of this motion.

WHEREFORE, Flexible respectfully requests that the Honorable Referee:

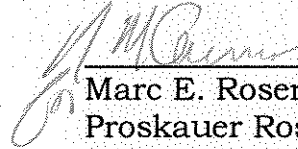
A. Grant this motion and extend the deadline for filing Flexible's Mandatory Disclosures to April 5, 2013; and

B. Grant such other relief as may be just.

Respectfully submitted,

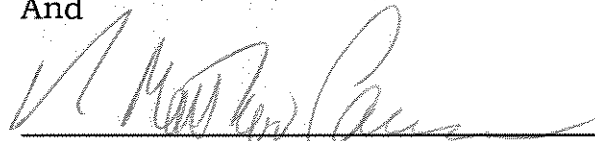
FLEXIBLE PRODUCTS COMPANY

By its Attorneys,



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Date: February 20, 2013

CERTIFICATE OF SERVICE

I certify that a copy of this pleading has been filed with the Clerk (help@hicilclerk.org) via email to and a copy has been sent by email to:

Eric A. Smith
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Date: February 20, 2013



R. Matthew Cairns