

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: 2005-HICIL-12
Proof of Claim Number: INTL 700616
Claimant Name: Century Indemnity Company

**LIQUIDATOR'S MOTION TO PLACE RESPONSE TO CIC'S
SUBMISSION REGARDING RUTTY POOL CLAIM UNDER SEAL**

Roger A. Sevigny, Commissioner of Insurance for the State of New Hampshire, as Liquidator ("Liquidator") of the Home Insurance Company ("Home"), hereby requests that the Referee place the Liquidator's response to the § 15 submission filed by Century Indemnity Company ("CIC") in this matter under seal. As reason therefor, the Liquidator states:

1. Concurrent with this motion, the Liquidator files his Response to CIC's Submission Regarding Ruddy Pool Claim. The Response addresses arguments made by CIC with respect to settlement agreements with Agrippina and Württembergische and in so doing necessarily discusses the Agrippina and Wurttembergische Agreements, which were submitted under seal by CIC as exhibits to its submission.
2. Agrippina and Württembergische have asserted that it is critical to their business interests that the agreements be held confidential and should not be disclosed.
3. The agreements were placed under seal by the Court in connection with the Liquidator's motions for approval of the agreements. See Order Placing Motion Concerning Agrippina Agreement Under Seal (January 14, 2005); Order Placing Confidential Affidavit Concerning Proposed Wurttembergische Agreement Under Seal (March 21, 2006). Other filings

concerning the Agrippina Agreement have also been placed under seal. See Order Relative to Filing of Certain Pleadings Under Seal (March 3, 2006).

4. The Liquidator accordingly requests that the response in 2005-HICIL-12 and its exhibits be placed under seal. If the Referee wishes, the Liquidator will prepare a redacted version of the response.

WHEREFORE, the Liquidator respectfully requests that the Referee place the Liquidator's Response to CIC's Submission Regarding Rutty Pool Claims under seal and grant such other and further relief as justice may require.

Respectfully submitted,

ROGER A. SEVIGNY, COMMISSIONER OF
INSURANCE OF THE STATE OF NEW HAMPSHIRE
SOLELY AS LIQUIDATOR OF THE HOME
INSURANCE COMPANY,

By his attorneys,



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June 19, 2006

Certificate of Service

I hereby certify that a copy of the foregoing Liquidator's Response CIC's Submission was sent, this 19th day of June, 2006, by email to all persons on the attached service list.



Eric A. Smith

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