

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-14

Proof of Claim Number: AMBC465096

AMBC464386

INTL277878

AMBC465074

Claimant Name: Century Indemnity Company

Matter Treaty 6

JOINT MOTION TO EXTEND CIC'S TIME TO RESPOND TO
LIQUIDATOR'S MOTION TO COMPEL AND DEPOSITION DEADLINE

Roger A. Sevigny, Commissioner of Insurance for the State of New Hampshire, as Liquidator ("Liquidator") of The Home Insurance Company ("Home"), and Century Indemnity Company ("CIC"), jointly move that the Referee enter an order extending the time for CIC to respond to the Liquidator's motion to compel to and including February 4, 2011 and extending the deadline for depositions by at least two weeks to a date to be determined during the hearing on the Liquidator's motion to compel. As reasons therefor, the parties state:

1. On January 14, 2011, the Liquidator filed his motion to compel production of documents concerning CIC's Treaty 6 claim.
2. Counsel for CIC have an arbitration hearing during the week of January 24 and are preparing for that hearing during this week. Accordingly, CIC has requested an extension of time to respond to the motion to compel until February 4, 2011.
3. The schedule for this matter set in the Referee's Ruling dated November 9, 2010 provided a deadline for the completion of depositions of February 25, 2011. However, it would be inefficient to depose CIC personnel until after the Referee has ruled on the motion to compel

as any additional document production would bear on those deposition(s). Further, the Liquidator needs time to digest the documents produced by CIC on January 14, 2011, and Liquidator's counsel will be out of the office during the week of February 21.

4. In the circumstances, the parties jointly request that the Referee (1) extend the time for CIC to respond to the Liquidator's motion to compel to and including February 4, 2011, and (2) extend the deadline for depositions by at least two weeks to a date to be determined during the hearing on the Liquidator's motion to compel. During the November 9, 2010 conference, the Referee observed that the proposed schedule was aggressive, and this has proved to be the case.


WHEREFORE, the parties jointly request that this motion be granted and that the Referee enter an order (1) extending the time for CIC to respond to the Liquidator's motion to compel to and including February 4, 2011, and (2) extending the deadline for depositions by at least two weeks to a date to be determined during the hearing on the Liquidator's motion to compel.

ROGER A. SEVIGNY, COMMISSIONER
OF INSURANCE OF THE STATE OF
NEW HAMPSHIRE, SOLELY AS
LIQUIDATOR OF THE HOME
INSURANCE COMPANY,
By his attorneys,
MICHAEL A. DELANEY
ATTORNEY GENERAL

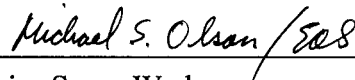
CENTURY INDEMNITY COMPANY

By its attorneys,

J. Christopher Marshall
NH Bar ID No. 1619
Civil Bureau
New Hampshire Department of Justice
33 Capitol Street
Concord, NH 03301-6397
(603) 271-3650



J. David Leslie
NH Bar ID No. 16859
Eric A. Smith
NH Bar ID No. 16952
Rackemann, Sawyer & Brewster
160 Federal Street
Boston, MA 02110
(617) 542-2300



Lisa Snow Wade
NH Bar ID No. 5595
Orr & Reno
One Eagle Square
Box 3550
Concord, NH 03302-3550
(603) 224-2381

Michael S. Olsan
White and Williams LLP
1650 Market Street
One Liberty Place, Suite 1800
Philadelphia, PA 19103
(215) 864-7000

January 21, 2011

Certificate of Service

I hereby certify that the foregoing was served by email on counsel for CIC this 21st day of January, 2011.



Eric A. Smith