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: 2008-HICIL-40 Proof of Claim Number: INTL 700695-38

Claimant Name:

Unionamerica Insurance

Company Limited

JOINT MOTION FOR EXTENSION OF TIME TO SUBMIT MANDATORY DISCLOSURES

The Parties respectfully request that the deadline for Claimant Unionamerica Insurance Company Limited ("Unionamerica") to submit its Mandatory Disclosures be extended until ten (10) days from the date the Referee enters the Parties' Proposed Confidentiality Stipulation and Order. As grounds for this Motion, the Parties state:

- The Parties are currently negotiating a proposed Confidentiality Stipulation and Order.
- 2. The Parties have exchanged drafts, and hope to jointly submit in the near future a proposed Confidentiality Stipulation and Order for consideration by the Referee.
- 3. The Parties agree that because the entry of the Confidentiality Stipulation and Order will affect Unionamerica's submission of its Mandatory Disclosures, the submission of the Mandatory Disclosures is best deferred until resolution of the Confidentiality Stipulation and Order.
 - 4. All the Parties join in this request, and no party will be prejudiced.

WHEREFORE, the Parties respectfully request that the deadline for Claimant Unionamerica to submit its mandatory disclosures be extended until ten (10) days from the date the Referee enters the Parties' Proposed Confidentiality Stipulation and Order.

The Insurance Commissioner of the State of New Unionamerica Insurance Company Hampshire Solely as Liquidator of the Home Limited **Insurance Company** By its attorneys, By its attorneys, Lisa Snow Wade ORR & RENO, PA Eric A. Smith One Eagle Square Rackemann, Sawyer & Brewster P.C. P.O. Box 3550 160 Federal Street Concord, NH 03302-3550 Boston, MA 02110-1700 Tel: (603) 224-2381 Tel: (617) 543-2300 lwade@orr-reno.com dleslie@rackemann.com esmith@rackemann.com Gary S. Lee Kathleen E. Schaaf James J. DeCristofaro Morrison & Foerster LLP 1290 Avenue of the Americas New York, NY 10104 Tel: (212) 468-8000 glee@mofo.com kschaaf@mofo.com jdecristofaro@mofo.com Unionamerica Insurance Company Limited By its attorneys, Joshua Gardner (N.H. Bar No. 16170) Edwards Angell Palmer & Dodge LLP 111 Huntington Avenue Boston, MA 02199 igardner@eapdlaw.com Of Counsel: Mark Everiss Edwards Angell Palmer & Dodge UK LLP One Fetter Lane London, EC4A 1JB United Kingdom

Certification

I, Joshua Gardner, hereby certify that on this 19th day of March, 2009, I caused to be served a copy of the foregoing via electronic mail to:

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