

STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT 103

BEFORE THE COURT APPOINTED REFEREE
IN RE: THE LIQUIDATION OF THE HOME INSURANCE COMPANY

DOCKET NUMBERS 03-E-0106

DISPUTED CLAIMS DOCKET

IN RE LIQUIDATOR NUMBER: 2009 HICL-
PROOF OF CLAIM NUMBER: CLMN711647
CLAIMANT'S NAME: ADEBOWALE O. OSIJO

CLAIMANT'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND
RESPONSES TO INTERROGATORIES

1. Claimant, Adebowale O. Osijo, MBA, respectfully motions the Court for an order compelling the Home Insurance Company in Liquidation to produce verified documents that he propounded, and verified responses to his interrogatories. The documents propounded and interrogatories are essential and indispensable part of the Claimant's Mandatory Disclosures in this insurance liquidation proceeding. The production of documents and responses to interrogatories are not at the discretion of the Home Insurance Company In Liquidation, when it comes to Mandatory Disclosures, in this insurance liquidation proceeding.

2. In support of this motion, Claimant attaches hereto, as EXHIBIT 1, a true and correct copy of a letter from the Home Insurance Company In Liquidation, dated March 5, 2009, which denied the production of documents and responses to interrogatories, on the ground that they are not "pertinent" to its determination of the claim in this matter.

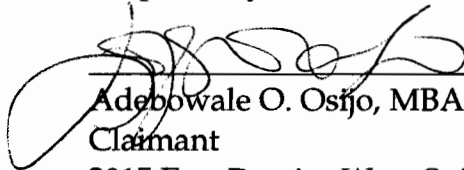
3. A copy of the Claimant's February 28, 2009 letter to the Home Insurance Company in Liquidation is attached hereto as EXHIBIT 2.

4. A copy of the Claimant's letter of March 5, 2009, to the Home Insurance Company in Liquidated is attached hereto as EXHIBIT 3.

WHEREFORE, Claimant respectfully prays that the Court orders the Home Insurance in Liquidation to produce verified copies of the documents requested and a verified response to the interrogatories, within ten days of the order.

Dated this 30th day of March, in the year 2009.

Respectfully Submitted:



Adebowale O. Osifo, MBA.

Claimant

2015 East Pontiac Way, Suite 203

Fresno, California 93726-3978

Telephone: (559) 273-5765

Facsimile: (559) 221-0585

Proof of Service by Mail

I, Jhoe F. Ajayi, declare the followings:

I. I am not a party in this insurance liquidation proceeding. I am over the age of eighteen years. I am a resident of the City and County of Fresno, California. I served the following document titled:

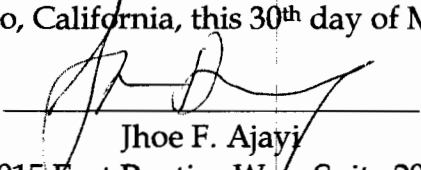
MOTION TO COMPEL RESPONSES AND PRODUCTION OF DOCUMENTS

on the following person:

The Liquidator
The Home Insurance Company In Liquidation
Post Office Box 1720
Concord, New Hampshire 03105-1720

by placing this document in an envelope, addressed as above, with first class stamp affixed on it. I thereafter sealed the envelope and deposited it with the United States Postal Service, for delivery.

2. I declare under the penalty of perjury and according to the laws in the State of California that the foregoing is true and correct. This declaration is executed in the City and County of Fresno, California, this 30th day of March, in the year 2009.



Jhoe F. Ajayi
2015 East Pontiac Way, Suite 203
Fresno, California 93726-3978

THE HOME
INSURANCE
COMPANY IN
LIQUIDATION



59 Maiden Lane
New York, New York 10038

Telephone: 212-530-4005
Fax: 212 299 3770
e-mail: mary.actor@homeinsco.com

March 25, 2009

Adebowale O. Osijo, MBA
2015 East Pontiac Way
Suite 203
Fresno, CA 93726-3979

Re: POC No.: CLMN711647
POC Claimant: Adebowale O. Osijo
POC Claimed Amount: \$3,000,000

Dear Mr. Osijo:

Enclosed is the Notice of Determination with respect to your Proof of Claim CLMN711647.

The Notice of Determination sets forth your rights and obligations in detail.

We acknowledge receipt of your letters of February 28th 2009 and March 5th 2009 requesting "The Liquidator's copy" of various documents and other information. As the Notice of Determination is based on decisions of the California courts that fully and finally determined the matters that you had placed at issue, your request for documents, which may or may not be in possession of the Liquidator, is not pertinent

Further information regarding the liquidation proceedings may be found on the website of the Liquidation Clerk www.hicilclerk.org. We call your attention in particular to the Restated and Revised Order Establishing Procedures Regarding Claims Filed With The Home Insurance Company In Liquidation. Pertinent information considered by the Liquidator will be provided in the "Case File" should you file an Objection.

Very truly yours,

Mary Actor
Senior Manager

Adebowale O. Osijo, MBA
2015 East Pontiac Way, Suite 203
Fresno, California 93726-3978
Telephone: (559) 273-5765
Facsimile: (559) 221-0585

February 28, 2009

By Email to: mary.actor@homeinsco.com & Regular Mail

Ms. Mary Actor
Senior Claims Manager
The Home Insurance Company In Liquidation
59 Maiden Lane, 5th Floor
New York, New York 10038

Re: POC No.: CLMMN711647
POC Claimant: Adebowale O. Osijo
Amount Claimed: \$3,000,000.00

Dear Ms. Actor:

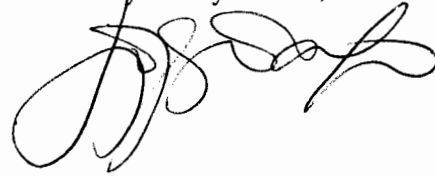
1. Thank you for your prompt responses in this matter in your emailed letter of February 27, 2009. I however, noticed that the letter and the one of February 13, 2009, did not state Amount of Claim of \$3,000,000, as usual. May I ask why? After all, every claim filed in and determined by The Home Insurance Company In Liquidation states the Amount of Claim and the Amount Allowed. I respectfully request your response to this issue.
2. Please furnish me with a copy of the following documents, so that I can present evidentiary facts, which are to the knowledge of the Liquidator of The Home Insurance Company In Liquidation, to the Court Appointed Referee:
 - a) The Liquidator's copy of my letter dated July 26, 1991, addressed to Georgia Ann Michell, and copied to David Raymond Pinelli, (deceased) of the then Law Offices of Larson & Burnham, in the matter of Osijo v Housing Resources Management, Inc., et al, Superior Court of California, Alameda County, Case No. C-649881.
 - b) The Liquidator's copy of the cancelled Bank of America check, issued by The Home Insurance Companies, on July 30, 1991, into the "Trust Account of Ganong & Michell as Trustees for Wale O. Osijo," in the amount of

\$250,000, in "Full and Final Payment of Settlement" of the aforementioned personal injury action.

- c) The Liquidator's copy of the letter which accompanied the aforementioned Bank of America check, authored by David Raymond Pinelli, (deceased), dated July 30, 1991, and addressed to Georgia Ann Michell.
 - d) The Liquidator's copy of any document, wherein I, Adebowale O. Osijo, as the Plaintiff in the aforementioned personal injury action, authorized Georgia Ann Michell to negotiate and cash on my behalf, any check, particularly the aforementioned Bank of America check, issued by The Home Insurance Companies for \$250,000, in "Full and Final Payment of Settlement" of the aforementioned personal injury action.
 - e) The Liquidator's copy of any Order, issued by the Superior Court of California, Alameda County, in the aforementioned personal injury action, which authorized Georgia Ann Michell to negotiate and cash the aforementioned check, and dispose of the proceeds of the check to herself, for her own use and purposes, without my knowledge or consent, and the Plaintiff in the action.
 - f) The Liquidator's copy of any document filed as a lien by Georgia Ann Michell in the aforementioned personal injury action, at any time, and adjudicated by the Superior Court of California, Alameda County, in any action.
3. Please furnish me with the following information so that I can have evidentiary facts to present to the Court Appointed Referee:
- a) The Liquidator's list of and any list all of legal malpractice action or actions, whether filed or not filed, against Georgia Ann Michell, on or before July 25, 1991, wherein The Home Insurance Companies had hired the then law firm of Larson & Burnham to defend and The Home Insurance Companies settled the legal malpractice action or actions.
 - b) Please state the date or dates that The Home Insurance Companies hired the law firm of Larson & Burnham to defend Georgia Ann Michell-Langsam in the legal malpractice action in the Superior Court of California, Contra Costa County, titled: Osijo v Ganong & Michell, et al, Case No. C-05253.

4. I look forward to your determination, which I hope and expect will include the foregoing evidentiary facts, which are to the knowledge of The Home Insurance Company In Liquidation. I also look forward to your prompt responses to the foregoing, with sincere appreciation.

Very Truly Yours,

A handwritten signature in black ink, appearing to be "D. J. [unclear]", written in a cursive style.

Adebowale O. Osijo, MBA
2015 East Pontiac Way, Suite 203
Fresno, California 93726-3978
Telephone: (559) 273-5765
Facsimile: (559) 221-0585

March 5, 2009

By Email to: mary.actor@homeinsco.com & Regular Mail

Ms. Mary Actor
Senior Claims Manager
The Home Insurance Company In Liquidation
59 Maiden Lane, 5th Floor
New York, New York 10038

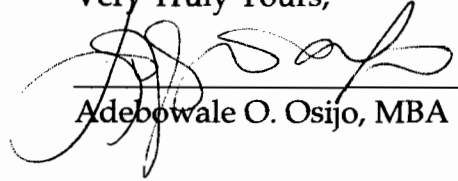
Re: POC No.: CLMMN711647
POC Claimant: Adebowale O. Osijo
Amount Claimed: \$3,000,000.00

Dear Ms. Actor:

Further to my letter of February 28, 2009, please furnish me with a copy of the Liquidator of the Home Insurance Company's copy of a document titled: "Notice of Dismissal of Attorney," dated, filed and served on September 5, 1991, in the Superior Court of California, Alameda County, in the matter of Osijo v Housing Resources Management, Inc., et al., Case No. C-649881.

I look forward to hearing from you, on the foregoing request, sooner than later, and thank you in advance.

Very Truly Yours,


Adebowale O. Osijo, MBA