## 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: I

INTL 700695-38

Claimant Name:

Unionamerica Insurance

**Company Limited** 

JOINT MOTION FOR ENTRY OF STIPULATION AND AGREED CONFIDENTIALITY ORDER

Unionamerica Insurance Company Limited and Century Indemnity Company, with the agreement of the Liquidator (collectively the "Parties"), respectfully request that the Referee enter the attached Stipulation and Agreed Confidentiality Order as an order. In support of this Motion, the Parties state:

- 1. The Parties anticipate that sensitive proprietary business information may be contained in documents produced as part of this disputed claim proceeding. The disclosure of such information may adversely affect the competitive position and/or business operations of the party disclosing such information.
- 2. In an effort to expedite and facilitate the resolution of this Disputed Claim

  Proceeding while protecting the confidentiality of the information, the Parties have negotiated
  and agreed to the attached proposed Stipulation and Agreed Confidentiality Order.
- 3. The attached is based on, and nearly identical to, a stipulation and order the Referee previously found to be acceptable in the 2005-HICIL-14 matter. See Order entered on April 17, 2006.

WHEREFORE, the Parties respectfully request that the attached Stipulation and Agreed Confidentiality Order be entered as an Order by the Referee (the endorsement line appears on page 13 of the document).

Dated: April 7, 2009

The Insurance Commissioner of the State of New Hampshire Solely as Liquidator of the Home Insurance Company

By its attorneys,

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