

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: 2013-HICIL-56
Proof of Claim Number: INSU389339
Claimant Name: Flexible Products Company
Claimant Number: INSU389339-01

**JOINT REQUEST TO STAY PROCEEDING
PENDING APPROVAL OF SETTLEMENT**

Roger A. Sevigny, Insurance Commissioner of the State of New Hampshire, as Liquidator (“Liquidator”) of The Home Insurance Company (“Home”), and Claimant, Flexible Products Company (“FPC”), jointly request that the Referee stay this disputed claim proceeding pending approval by the Superior Court of a settlement in principle reached between the parties. As reasons therefor, the parties state:

1. On July 17, 2013, the Referee issued a Structuring Conference Order setting a schedule for the parties to submit briefs on three issues. Under that schedule, the first brief is due on August 19, 2013.
2. On August 9, 2013, the Liquidator and FPC reached an agreement in principle to settle FPC’s claim against Home subject to approval of the Superior Court in the liquidation proceeding as required by the insurer liquidation statute. See RSA 402-C:45.
3. The parties are presently documenting the settlement. Once a settlement agreement has been executed, the Liquidator will promptly file a motion for approval of the settlement with the Superior Court.
4. Assuming the Superior Court approves the settlement, the parties will then jointly request that this disputed claim proceeding be dismissed.

5. To avoid unnecessary effort and expense in the interim, the parties jointly request that the Referee stay this disputed claim proceeding until the Superior Court has acted on the Liquidator's upcoming motion for approval of the settlement between FPC and the Liquidator.

WHEREFORE, FPC and the Liquidator request that the Referee stay this matter until the Superior Court has acted upon the Liquidator's motion for approval of the settlement.


Respectfully submitted,

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

By his attorneys,

JOSEPH A. FOSTER
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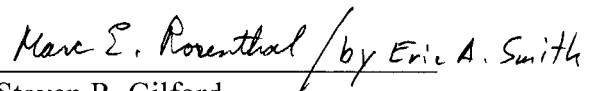
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August 12, 2013

Respectfully submitted,

FLEXIBLE PRODUCTS COMPANY

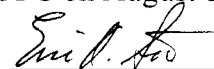
By its attorneys,



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Certificate of Service

I hereby certify that a copy of the foregoing Joint Request to Stay Proceeding Pending Approval of Settlement was emailed to counsel for FPC on August 12, 2013.



Eric A. Smith