

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**

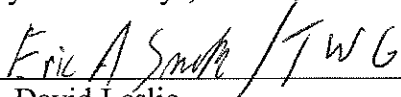
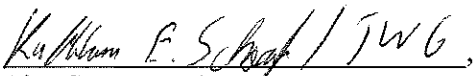
**In Re Liquidator Number: 2008-HICIL-40  
Proof of Claim Number: INTL 700695-38  
Claimant Name: Unionamerica Insurance  
Company Limited**

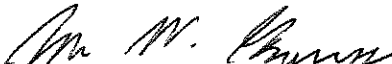
**JOINT MOTION FOR EXTENSION OF TIME  
TO SUBMIT MANDATORY DISCLOSURES**

The Parties respectfully request that the deadline for Claimant Unionamerica Insurance Company Limited ("Unionamerica") to submit its mandatory disclosures be extended by seven (7) days, to and including March 20, 2009. As grounds for this motion, the Parties state:

1. Unionamerica is prepared to make its mandatory disclosures today. However, Unionamerica has raised concerns with the Liquidator and Century Indemnity Company concerning the confidentiality of its disclosure documents.
2. The Parties request this extension of time in order to work towards resolving this confidentiality issue, including possibly requesting a confidentiality order.

WHEREFORE, the Parties respectfully request that the deadline for Claimant Unionamerica to submit its mandatory disclosures be extended by seven (7) days, to and including March 20, 2009.

<p>The Insurance Commissioner of the State of New Hampshire Solely as Liquidator of the Home Insurance Company By its attorneys,  J. David Leslie Eric A. Smith Rackemann, Sawyer &amp; Brewster P.C.</p>	<p>Century Indemnity Company By its attorneys,  Lisa Snow Wade ORR &amp; RENO, PA One Eagle Square P.O. Box 3550 Concord, NH 03302-3550</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>160 Federal Street          Boston, MA 02110-1700          Tel: (617) 543-2300  <a href="mailto:dleslie@rackemann.com">dleslie@rackemann.com</a>  <a href="mailto:esmith@rackemann.com">esmith@rackemann.com</a></p>	<p>Tel: (603) 224-2381  <a href="mailto:lwade@orr-reno.com">lwade@orr-reno.com</a></p> <p>Gary S. Lee          Kathleen E. Schaaf          James J. DeCristofaro          Morrison &amp; Foerster LLP          1290 Avenue of the Americas          New York, NY 10104          Tel: (212) 468-8000  <a href="mailto:glee@mofocom">glee@mofocom</a>  <a href="mailto:kschaaf@mofocom">kschaaf@mofocom</a>  <a href="mailto:jdecristofaro@mofocom">jdecristofaro@mofocom</a></p>
<p>Unionamerica Insurance Company Limited          By its attorneys,</p>  <p>Joshua Gardner (N.H. Bar No. 16170)          Edwards Angell Palmer &amp; Dodge LLP          111 Huntington Avenue          Boston, MA 02199  <a href="mailto:jgardner@eapdlaw.com">jgardner@eapdlaw.com</a></p> <p>Of Counsel:</p> <p>Mark Everiss          Edwards Angell Palmer &amp; Dodge UK LLP          One Fetter Lane          London, EC4A 1JB          United Kingdom</p>	

**Certification**

I, Joshua Gardner, hereby certify that on this 13th day of March, 2009, I caused to be served a copy of the foregoing via electronic mail to:

<p>J. David Leslie          Eric Smith          Rackemann, Sawyer &amp; Brewster P.C.          160 Federal Street          Boston, MA 02110-1700</p>	<p>Lisa Snow Wade          ORR &amp; RENO, PA          One Eagle Square          P.O. Box 3550          Concord, NH 03302-3550</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------

Tel: (617) 543-2300  
[dleslie@rackemann.com](mailto:dleslie@rackemann.com)  
[esmith@rackemann.com](mailto:esmith@rackemann.com)

Tel: (603) 224-2381  
[lwade@orr-reno.com](mailto:lwade@orr-reno.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@mofocom](mailto:glee@mofocom)  
[kschaaf@mofocom](mailto:kschaaf@mofocom)  
[jdecristofaro@mofocom](mailto:jdecristofaro@mofocom)

  
\_\_\_\_\_  
Joshua Gardner