

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

In the Matter of the Rehabilitation of
The Home Insurance Company

Docket No. 03-E-106

**RESPONSE TO LIMITED OBJECTION OF REHABILITATOR
TO INTERNATIONAL PAPER COMPANY AND MASONITE
CORPORATION'S MOTION TO WITHDRAW AS INTERVENING PARTY**

NOW COME Intervenors International Paper Company ("IP") and Masonite Corporation ("MC"), by and through their attorneys, and respond as follows to the Limited Objection of the Rehabilitator to International Paper and Masonite Corporation's Motion to Withdraw as Intervening Party:

The Rehabilitator's Limited Objection takes inconsistent positions. On the one hand, the Rehabilitator argues that "IP and MC's Motions should be denied or withdrawn with prejudice." On the other hand, the Rehabilitator concedes that "if IP and MC encounter some new issue that they could not bring up in their motions, they should be free to seek to intervene again and raise them." The latter is precisely what the pending motions seek. The parties agree that no action is necessary on the pending Motion to Clarify because intervening events in the State of California have rendered the relief requested in that Motion moot. However, if subsequent events in California give rise to a need to seek clarification of this Court's Rehabilitation Order, IP and MC seek nothing more than the right to move for clarification at that time. The Rehabilitator cites no authority for the proposition the IP and MC should be precluded from so doing.

FILED
2003
SEP 10 10 57 AM
CLERK OF COURT
MERRIMACK, N.H.

Respectfully submitted,


**INTERNATIONAL PAPER COMPANY and
MASONITE CORPORATION**

By Their Attorneys,

**RATH, YOUNG AND PIGNATELLI,
*Professional Association***

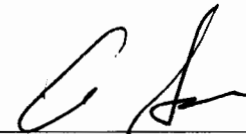
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4/28/03
Date

By: 
Sherilyn Burnett Young, Esquire
Andrew W. Serell, Esquire

CERTIFICATE OF SERVICE

I, Andrew W. Serell, hereby certify that on this 28th day of April, 2003 a true and correct copy of the foregoing document was served via first class mail, postage paid to Peter C. L. Roth, Senior Assistant Attorney General and Martin P. Honigberg, Esquire.

By: 
Andrew W. Serell, Esquire

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