

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

Docket No. 03-E-0106 2005 MAR 24 P 3: 35

In the Matter of the Liquidation of the Home Insurance Company

MOTION TO ENLARGE TIME FOR RESPONSE TO ACE COMPANIES' REQUEST TO COMPEL PRODUCTION OF DOCUMENTS BY AFIA CEDENT UNIONAMERICA INSURANCE COMPANY

NOW COMES Unionamerica Insurance Company, LTD (hereinafter "Unionamerica"), by and through its attorneys, Robert Stein & Associates, PLLC, for the limited purpose of moving this Court to enlarge time to respond to ACE Companies' Request to Compel Production of Documents until April 4, 2005. In support of this Motion, Unionamerica states as follows:

1. On March 15, 2005, the ACE Companies, by their attorneys, moved this Court to compel production of certain documents by Unionamerica.
2. Unionamerica is domiciled in the United Kingdom and is not a party to the current proceedings.
3. The ACE Companies' Motion raises complex issues involving the nature and extent of the Court's jurisdiction over Unionamerica and the adequacy of service of process, which require research and analysis which would be impractical to complete within ten days of the filing of the ACE Companies' Motion.
4. Undersigned counsel was retained by Unionamerica on March 23, 2005.
5. Unionamerica requests, by this Motion, that this Court enlarge the time to respond to the Motion to Compel to April 4, 2005.
6. The granting of this Motion will not result in prejudice to any party to this matter and is in the interests of justice and judicial economy. Currently pending before this Court is a Motion to Compel that the ACE Companies have filed in this matter against the Liquidator. The Liquidator is required to respond to that Motion no earlier than April 4, 2005. Therefore, granting the current Motion will not result in a continuance of any hearing, conference, or trial.

7. Counsel for ACE Companies, Ronald L. Snow, Esquire, has been contacted, for his assent to this Motion. The ACE Companies however, have not yet responded to our inquiries.

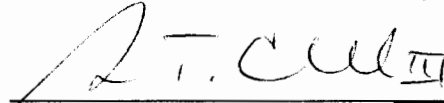
8. Because no Memorandum of Law is necessary in connection with this Motion, none has been appended.

WHEREFORE, Unionamerica prays that this Honorable Court:

- A. Grant the within Motion;
- B. Extend the time for Unionamerica's response to the Motion to Compel to April 4, 2005;
- C. Provide such other and further relief as may be just and equitable.

Respectfully submitted,
Unionamerica Insurance Company, LTD

By its Attorneys,
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CERTIFICATION

I hereby certify that a copy of the foregoing Motion has been forwarded via First Class Mail to:

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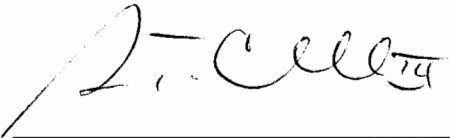
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