

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT  
2005 MAR 31 A 10: 01

Docket No. 03-E-0106

In the Matter of the Liquidation of  
The Home Insurance Company

NH SUPERIOR COURT  
MERRIMACK COUNTY  
MERRIMACK, NH

**ASSENTED-TO MOTION TO ENLARGE TIME FOR  
RESPONSE TO ACE COMPANIES' MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS BY GARETH HOWARD HUGHES**

The non-party Gareth Howard Hughes, as Joint Provisional Liquidator of The Home Insurance Company ("Joint Provisional Liquidator"), by and through his attorneys, Rackemann, Sawyer & Brewster, P.C., hereby moves that the Court extend the date by which the Joint Provisional Liquidator must file his response to the ACE Companies' Motion to Compel Production of Documents by Gareth Howard Hughes (the "Motion") to and including April 8, 2005. As reasons therefor, the Joint Provisional Liquidator states:

1. The ACE Companies filed the Motion on March 24, 2005.
2. The Joint Provisional Liquidator was appointed by order of the High Court of Justice in London, England, is a resident of the United Kingdom, and is not a party to this matter.
3. In light of the Easter holidays, both the Joint Provisional Liquidator and his principal assistant have been out of the office from March 25 until March 30, 2005, rendering it impractical to respond to the issues raised by the Motion within ten days.
4. Counsel for the ACE Companies assents to the relief sought by this motion.
5. The granting of this Motion will not result in the continuance of any hearing, conference, or trial. No memorandum of law is necessary in connection with this Motion as the relief requested is within the sound discretion of the Court.

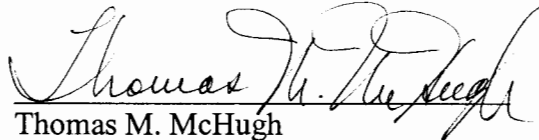
GRANTED  
Rackemann  
3/31/05

WHEREFORE, the Joint Provisional Liquidator respectfully requests that the Court:

- A. Enlarge the time for the Joint Provisional Liquidator to respond to ACE Companies' Motion to Compel Production of Documents to Gareth Howard Hughes to and including April 8, 2005; and
- B. Grant such other and further relief as may be just.

GARETH HOWARD HUGHES, AS JOINT  
PROVISIONAL LIQUIDATOR OF THE HOME  
INSURANCE COMPANY,

By his attorneys,



Thomas M. McHugh

J. David Leslie, pro hac vice pending

Eric A. Smith, pro hac vice pending

Rackemann, Sawyer & Brewster

One Financial Center

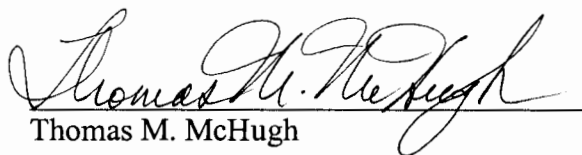
Boston, MA 02111

(617) 542-2300

March 30, 2005

Certificate of Service

I hereby certify that a copy of the foregoing Assented-to Motion to Extend Time for Response to ACE Companies' Motion to Compel Production of Documents by Gareth Howard Hughes was sent, this 30th day of March, 2005, by first class mail, postage prepaid to all persons on the attached service list.

  
Thomas M. McHugh

A0315647.DOC;1

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT  
2005 MAR 31 A 10:01

In the Matter of the Liquidation of  
The Home Insurance Company  
Docket No. 03-E-0106

NH SUPERIOR COURT  
MERRIMACK COUNTY  
CONCORD, NH

SERVICE LIST

Ronald L. Snow, Esq.  
Orr & Reno  
One Eagle Square  
P.O. Box 3550  
Concord, New Hampshire 03302-3550

Gary Lee, Esq.  
Pieter Van Tol, Esq.  
Lovells  
16<sup>th</sup> Floor  
900 Third Avenue  
New York, New York 10022

Gail M. Goering, Esq.  
Adam Goodman, Esq.  
Eric Haab, Esq.  
Lovells  
One IBM Plaza  
330 N. Wabash Avenue, Suite 1900  
Chicago, Illinois 60611

Andre Bouffard, Esq.  
Eric D. Jones, Esq.  
Downs Rachlin Martin PLLC  
199 Main Street  
P.O. Box 190  
Burlington, Vermont 05402-0190

Peter G. Callaghan, Esq.  
Preti, Flaherty, Beliveau, Pachos &  
Haley, PLLP  
57 North Main Street  
P.O. Box 1318  
Concord, New Hampshire 03302-1318

Martin P. Honigberg, Esq.  
Sulloway & Hollis, P.L.L.C.  
9 Capitol Street  
P.O. Box 1256  
Concord, New Hampshire 03302-1256

George T. Campbell, III, Esq.  
Robert A. Stein, Esq.  
Robert A. Stein & Associates, PLLC  
One Barberry Lane  
P.O. Box 2159  
Concord, New Hampshire 03302-2159

Suzanne M. Gorman, Esq.,  
Senior Assistant Attorney General  
Department of Justice  
State of New Hampshire  
33 Capitol Street  
Concord, New Hampshire 03301-6397