

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

Docket No. 03-E-0106

**In the Matter of the Liquidation of
The Home Insurance Company**

**CIC'S MOTION TO FILE MOTION TO RECONSIDER
ORDER APPROVING LIQUIDATOR'S REPORT OF
CLAIMS AND RECOMMENDATIONS AS OF DECEMBER
15, 2005, AND EXHIBIT A ATTACHED THERETO, UNDER SEAL**

Century Indemnity Company ("CIC"), by its attorneys, Orr & Reno P.A. and Lovells, hereby moves to file under seal its Motion to Reconsider the Order Approving Liquidator's Report of Claims and Recommendations as of December 15, 2005 (the "Motion to Reconsider"), and Exhibit A attached thereto, and respectfully states as follows:

1. Exhibit A to the Motion to Reconsider comprises the Liquidator's papers regarding a settlement agreement between Zurich Versicherung Aktiengesellschaft (Deutschland) (which is the successor to Agrippina Versicherung Aktiengesellschaft ("Agrippina")) and Home, as well as the actual settlement agreement.
2. The Liquidator's papers regarding the settlement agreement, including the settlement agreement, were filed on December 30, 2004. Agrippina thereafter asserted that the Liquidator's papers and the settlement agreement were confidential and should not have been publicly filed. On January 13, 2005, the Liquidator moved to have these papers, including the settlement agreement, placed under seal. This Court granted the Liquidator's motion on January 14, 2005.
3. In accordance with this Court's order placing the Liquidator's papers, including the settlement agreement, under seal, Exhibit A to the Motion to Reconsider should be filed under seal.

4. CIC also moves this Court to direct that the Motion to Reconsider itself be filed under seal. The Liquidator's papers and the settlement agreement are the very basis of the Motion to Reconsider. As such, the Motion to Reconsider references these confidential papers and settlement agreement, including amounts to be paid thereunder.

WHEREFORE, CIC respectfully requests that this Court:

- A. Enter an Order in the form submitted herewith directing CIC to file its Motion to Reconsider, and Exhibit A attached thereto, under seal; and
- B. Grant such other and further relief as this Court deems proper.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing *CIC's Motion to Reconsider Order Approving Liquidator's Report of Claims and Recommendations as of December 15, 2005 FILED UNDER SEAL* has been served on Roger A. Sevigny, Commissioner of Insurance, Peter Bengelsdorf, Special Deputy, and the following counsel via First Class mail on February 7, 2006:

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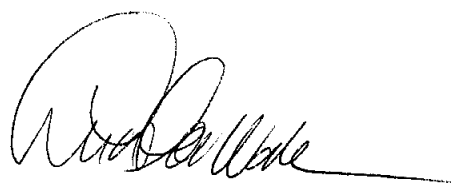
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Docket No. 03-E-0106

In the Matter of the Liquidation of
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**ORDER DIRECTING CIC'S MOTION TO RECONSIDER ORDER
APPROVING LIQUIDATOR'S REPORT OF CLAIMS AND
RECOMMENDATIONS AS OF DECEMBER 15, 2005, AND
EXHIBIT A ATTACHED THERETO, TO BE FILED UNDER SEAL**

On consideration of the motion of Century Indemnity Company ("CIC") to file its Motion to Reconsider the Order Approving Liquidator's Report of Claims and Recommendations as of December 15, 2005 (the "Motion to Reconsider"), and Exhibit A attached thereto, under seal, it is ORDERED that:

The Motion to Reconsider, including Exhibit A attached thereto, shall be filed under seal.

Dated: _____

Presiding Justice