

DN PC

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

2011 MAR 11 A 11:34

Docket No. 03-E-0106

FILED IN SUPERIOR COURT  
MERRIMACK COUNTY  
MARCH 11 2011

In the Matter of the Liquidation of  
The Home Insurance Company

**FULLER-AUSTIN DEFENDANTS' SECOND ASSENTED-TO MOTION  
FOR EXTENSION OF TIME TO RESPOND TO THE LIQUIDATOR'S  
FOURTH MOTION FOR APPROVAL OF DISPOSAL OF RECORDS**

NOW COME Zurich Insurance Company, Zurich American Insurance Company, Zurich-American Insurance Company of Illinois, American Guarantee & Liability Insurance Company, American Zurich Insurance Company, Steadfast Insurance Company, and Orange Stone Reinsurance (the "*Fuller-Austin* Defendants"), and move for a short extension of time until March 18, 2011, to respond to the Liquidator's Fourth Motion for Approval of Disposal of Certain records filed by the Liquidator in this matter. In support of this motion, the *Fuller-Austin* Defendants state as follows:

1. The Liquidator filed the instant motion on or about February 16, 2011.
2. The *Fuller-Austin* Defendants filed an assented-to motion to extend their deadline to respond to March 11, 2011, and have been engaged in discussions with the Liquidator's counsel concerning what records are to be destroyed and what records are to be retained.
3. Those discussions are not finalized and the *Fuller-Austin* Defendants seek a short extension until March 18, 2011, to continue the discussions and, if necessary, to respond to the motion.
4. Counsel to the Liquidator concurs in the relief requested herein.

WHEREFORE, the *Fuller-Austin* Defendants respectfully request that the Court,

A. Grant this Motion;

B. Extend the time for the *Fuller-Austin* Defendants to respond to the Liquidator's motion to March 18, 2011; and

C. Grant such other relief as the Court deems appropriate.


Respectfully submitted,

ZURICH INSURANCE COMPANY, AMERICAN  
GUARANTEE AND LIABILITY INSURANCE  
COMPANY, AMERICAN ZURICH INSURANCE  
COMPANY, ZURICH-AMERICAN INSURANCE  
COMPANY, ZURICH AMERICAN INSURANCE  
COMPANY OF ILLINOIS, STEADFAST  
INSURANCE COMPANY, and ORANGE STONE  
REINSURANCE

By their attorneys,

SULLOWAY & HOLLIS, P.L.L.C.


Dated: March 11, 2011

  
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was sent by first-class mail to the individuals on the attached service list.

Dated: March 11, 2011

  
\_\_\_\_\_  
Martin P. Honigberg

STATE OF NEW HAMPSHIRE

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The Home Insurance Company

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