

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT
029189

In The Matter Of The Liquidation Of
The Home Insurance Company

Docket No. 217-2003-EQ-106

SUPERIOR COURT

Proof of Claim No.: INSU240739-01 2018 NOV 16 PM 3 27

**CLAIMANT'S ASSENTED-TO MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Claimant Bridgestone Americas Tire Operations, LLC, respectfully files this motion for leave to file under seal (1) an unredacted version of Bridgestone's Objections to the Referee's September 10, 2018 Report and Motion to Recommit to the Referee for Further Proceedings (the "Motion to Recommit"), and (2) the Appendix to Bridgestone's Motion to Recommit.

On December 17, 2015, the Referee entered the Fully Executed Stipulation and Order Governing Confidentiality of Documents and Information (the "Stipulated Protective Order"). Pursuant to paragraph 11 of the Stipulated Protective Order, documents comprising, quoting from or disclosing the contents or substance of Confidential Information were required to be filed under seal with the Referee and Liquidation Clerk.

Bridgestone anticipates filing its Motion to Recommit no later than November 20, 2018. Such Motion to Recommit will include an Appendix comprised of the relevant filings in the liquidation proceeding before the Referee. The filings contained within the Appendix reflect Confidential Information in accordance with the Stipulated Protective Order, and were therefore filed under seal with the Referee and Liquidation Clerk.

In order to maintain the protection afforded to Confidential Information under the Stipulated Protective Order, Bridgestone hereby respectfully requests leave to file under seal an unredacted copy of the Motion to Recommit and the Appendix thereto.

Counsel for Bridgestone has conferred with counsel for the Liquidator, and the Liquidator has assented to the relief sought in this Motion for Leave to File Documents Under Seal.

RESPECTFULLY SUBMITTED this 16th day of November, 2018.

/s Mark J. Andreini
Mark J. Andreini (Ohio Bar #0063815)
Admitted *pro hac vice*
Joseph Z. Czerwien (Ohio Bar #0093720)
Admitted *pro hac vice*
JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212

Michael J. Tierney (N.H. Bar #17173)
Robert E. Murphy, Jr. (N.H. Bar #1848)
Wadleigh, Starr & Peters, P.L.L.C.
95 Market Street
Manchester, New Hampshire 03101
Telephone: (603) 669-4140
Facsimile: (603) 669-6018

Attorneys for Bridgestone Americas Tire
Operations, LLC

Certificate of Service

I hereby certify that the foregoing Assented-To Motion for Leave to File Documents Under Seal was served by mail on counsel for the Liquidator this 16th day of November, 2018.

/s Mark J. Andreini

Mark J. Andreini (Ohio Bar #0063815)

Admitted *pro hac vice*

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[PROPOSED] ORDER

Pending before the Court is Claimant Bridgestone Americas Tire Operations, LLC's Assented-To Motion for Leave to File Documents Under Seal. Having considered the motion and the applicable law, the Court determines that the foregoing motion should be granted. Accordingly, the Court hereby

ORDERS that Claimant's Assented-To Motion for Leave to File Documents Under Seal is GRANTED and the documents described in and attached to the Assented-To Motion for Leave to File Documents Under Seal may be filed under seal.

Signed this ____ day of _____, 2018
