Of Counsel: DAMON KEY LEONG KUPCHAK HASTERT Attorneys at Law A Law Corporation

TRED R. EYERLY 5641-0 te@hawaiilawyer.com
Damon Key Leong Kupchak Hastert 1003 Bishop Street, Suite 1600
Honolulu, HI 96813
www.hawaiilawyer.com
Telephone: (808) 531-8031
Facsimile: (808) 533-2242

Attorneys for Catholic Foreign Mission Society of American Inc. aka Maryknoll Father and Brothers

MERRIMACK COUNTY SUPERIOR COURT

OF THE STATE OF NEW HAMPSHIRE

In the Matter of the Liquidation of The Home Insurance Company) DOCKET NO. 217-2003-EQ-00106)
) CATHOLIC FOREIGN MISSION
) SOCIETY OF AMERICAN INC. AKA
) MARYKNOLL FATHER AND
) BROTHERS OBJECTION TO
) MOTION FOR APPROVAL OF
) CLAIM AMENDMENT DEADLINE
) REGARDING THE HOME
) INSURANCE COMPANY, IN
) LIQUIDATION; CERTIFICATE OF
) SERVICE
)
	,

CATHOLIC FOREIGN MISSION SOCIETY OF AMERICAN INC. AKA MARYKNOLL FATHER AND BROTHERS OBJECTION TO MOTION FOR APPROVAL OF CLAIM AMENDMENT DEADLINE REGARDING THE HOME INSURANCE COMPANY, IN LIQUIDATION

Insured/Claimant Catholic Foreign Mission Society of American Inc. aka

Maryknoll Father and Brothers ("Maryknoll") hereby submits its objection to the Motion for

Approval of Claim Amendment Deadline filed by the Liquidator.

Maryknoll has submitted several claims to The Home under a policy issued to Maryknoll

by The Home for the period 1970 to 1973, Policy No. HEC 9792965. The claims relate to suits

filed against Maryknoll in Hawaii regarding alleged sexual abuse by personnel that allegedly

worked for Maryknoll. The Hawaii State Legislature has consistently extended the statute of

limitations for the filing of such claims. The latest extension is until June 30, 2020.

Consequently, new, additional claims within The Home's policy period may be filed against

Maryknoll.

Maryknoll upheld its end of the bargain by paying all premiums for the policy issued by

The Home. Therefore, Maryknoll objects to the Motion seeking to impose a final submission of

proofs of claim in The Home liquidation.

DATED: Honolulu, Hawaii, November 15, 2019.

DAMON KEY LEONG KUPCHAK HASTERT

Attorneys for CATHOLIC FOREIGN MISSION SOCIETY OF AMERICAN INC. aka MARYKNOLL

FATHER AND BROTHERS

2

474538

MERRIMACK COUNTY SUPERIOR COURT

OF THE STATE OF NEW HAMPSHIRE

In the Matter of the Liquidation of)	DOCKET NO.	217-2003-EQ-00106
The Home Insurance Company)		
)	CERTIFICAT	E OF SERVICE
)	r	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date a true and correct copy of the foregoing document was duly served on the following by U.S. Mail, to its last known address:

J. Christopher Marshal Civil Bureau New Hampshire Department of Justice 33 Capitol St. Concord, NH 03301-6397

J. David Leslie/Eric A. Smith Rackemann, Sawyer & Brewster 160 Federal St. Boston, MA 02110-1700

DATED: Honolulu, Hawaii, November 15, 2019.

DAMON KEY LEONG KUPCHAK HASTERT

TRED R. EYERLY

Attorneys for CATHOLICA OREIGN MISSION SOCIETY OF AMERICÁN INC. aka MARYKNOLL

FATHER AND BROTHERS