

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

Docket No. 217-2003-EQ-00106

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

**MOTION TO EXTEND DEADLINE FOR ZURICH INSURANCE PLC
GERMAN BRANCH AND WÜRTTEMBERGISCHE VERSICHERUNG AG
TO OBJECT TO THE LIQUIDATOR'S MOTION FOR APPROVAL OF CLAIM AMENDMENT
DEADLINE TO NOVEMBER 25, 2019**

Zurich Insurance plc, German Branch and Württembergische Versicherung AG (hereinafter, "Objecting Creditors"), by and through their attorneys, McLane Middleton, Professional Association, move this Court to extend the time to object to John R. Elias, Insurance Commissioner of the State of New Hampshire's ("Liquidator") Motion for Approval of Claim Amendment Deadline ("Motion"). In support of this motion, the Objecting Creditors state as follows:

1. Pursuant to the Court's current procedural schedule in this case, the deadline for parties to object to the Motion is November 18, 2019.
2. Undersigned counsel has only recently been retained and needs additional time to review the case records, gather facts, and prepare an objection to the Motion. On behalf of the Objecting Creditors, counsel requests a limited extension of the deadline to object of one week to November 25, 2019.
3. The underlying facts and insurance insolvency issues are highly complex and involve, among other things, communications from the beginning of the liquidation to present day. Furthermore, the Objecting Creditors are European companies not readily familiar with New Hampshire insurance insolvency law. These factors also merit a short one-week extension.

4. Granting the requested limited extension will not disturb the procedural schedule in this case and will not materially impact the Liquidator's efforts to respond to the Objecting Creditors' forthcoming objection nor those of any other objecting party.

5. Counsel for the Liquidator declined to assent to the relief requested in this motion.

6. Counsel for the Objecting Creditors did not seek further assent from the other parties in this case because the relief sought in this motion is requested for the Objecting Creditors only.

WHEREFORE, the Objecting Creditors respectfully request that this Court:

- A. Extend the time for Zurich Insurance plc German Branch and Württembergische Versicherung AG to object to the Motion for Approval of Claim Amendment Deadline by one week to November 25, 2019; and
- B. Grant such further relief as it deems just and reasonable.


Respectfully submitted,

ZURICH INSURANCE PLC GERMAN
BRANCH AND WUERTTEMBERGISCHE
VERSICHERUNG,

By their Attorneys,

McLANE MIDDLETON,
PROFESSIONAL ASSOCIATION

Dated: November 15, 2019

By: 
Mark C. Rouvalis (Bar No. 6565)
Steven J. Dutton (Bar No. 17101)
Viggo C. Fish (Bar No. 267579)
900 Elm Street, 10th Floor
Manchester, NH 03101
(603) 625-6464
mark.rouvalis@mclane.com
steven.dutton@mclane.com
viggo.fish@mclane.com

FREEBORN & PETERS LLP

Joseph T. McCullough IV*

Mark R. Goodman*

311 South Wacker Drive, Suite 3000

Chicago, IL 60606

(312) 360-6000

jmccullough@freeborn.com

mgoodman@freeborn.com

**To be admitted Pro Hac Vice*

Certificate of Service

I hereby certify that a copy of the foregoing Motion to Extend was sent this 15th day of November 2019 by first class mail, postage prepaid to all persons on the attached service list.



Mark C. Rouvalis

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SERVICE LIST

J. Christopher Marshall
J.Christopher.Marshall@doj.nh.gov
Civil Bureau
New Hampshire Department of Justice
33 Capitol Street
Concord, NH 03301-6397

J. David Leslie
dleslie@rackemann.com
Eric A. Smith
esmith@rackemann.com
Rackemann, Sawyer & Brewster P.C.
160 Federal Street
Boston, MA 02110

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

Gary S. Lee, Esq.
James J. DeCristofaro, Esq.
Kathleen E. Schaaf, Esq.
Morrison & Foerster
250 West 55th Street
New York, NY 10019-9601

David M. Spector, Esq.
Dennis G. Lagory, Esq.
Schiff Hardin LLP
6600 Sears Tower
Chicago, IL 60606

Richard Mancino, Esq.
Willkie Farr & Gallagher, LLP
787 Seventh Avenue
New York, New York 10019

Joseph G. Davis, Esq.,
Willkie Farr & Gallagher LLP
1875 K. Street, N.W.
Washington, DC 20006

Albert P. Bedecarre, Esq.
Quinn Emanuel Urguhart Oliver & Hedges
LLP
50 California Street, 22nd Floor
San Francisco, California 94111

Jeffrey W. Moss, Esq.
Morgan Lewis & Bockius, LLP
One Federal Street
Boston, Massachusetts 02110

Robert M. Horkvich, Esq.
Robert Y. Chung, Esq.
Anderson Kill & Olick, P.C.
1251 Avenue of the Americas
New York, New York 10020

Andrew B. Livernois, Esq.
Ransmeier & Spellman, P.C.
One Capitol Street
P.O. Box 600
Concord, New Hampshire 03302-0600

Samantha D. Elliot, Esq.
Gallagher, Callahan & Gartrell, P.C.
214 North Main Street
Concord, NH 03301

David H. Simmons, Esq.
Mary Ann Etzler, Esq.
Daniel J. O'Malley, Esq.
deBeaubien, Knight, Simmons, Mantzaris &
Neal LLP
332 North Magnolia Avenue
P.O. Box 87
Orlando, Florida 32801

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

Michael S. Lewis, Esq.
Rath Young Pignatelli
One Capital Plaza
Concord, New Hampshire 03302-1500

John A. Hubbard
615 7th Avenue South
Great Falls, Montana 59405

Mark J. Andreini, Esq.
Jones Day
North Point
901 Lakeside Avenue
Cleveland, OH 44114-1190

Paul A. Zevnik, Esq.
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Gregory T. LoCasale, Esq.
White and Williams LLP
One Liberty Place, Suite 1800
Philadelphia, Pennsylvania 19103-7395

Michael J. Tierney, Esq.
Wadleigh, Starr & Peters PLLC
95 Market Street
Manchester, New Hampshire 03101

Stephanie V. Corrao, Esq.
Crowell & Moring
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004-2595

Harry Cohen, Esq.
Crowell & Moring
590 Madison Avenue, 20th Floor
New York, New York 10022-2544

Harry L. Bowles
306 Big Hollow Lane
Houston, Texas 77042

Michael Y. Horton, Esq.
Morgan & Lewis & Bockius LLP
300 South Grand Avenue, 22nd Floor
Los Angeles, California 90071

Hillary Loynes Palazzolo, Esq.
Keith Dotseth, Esq.
Larson King
30 East Seventh Street, Suite 2800
St. Paul, Minnesota 55101

Joseph C. Tanski, Esq.
John S. Stadler, Esq.
Nixon Peabody LLP
100 Summer Street
Boston, Massachusetts 02110

Kyle A. Forsyth, Esq.
Commercial Litigation Branch/Civil Division
United States Department of Justice
P.O. Box 875
Washington, D.C. 20044-0875

W. Daniel Deane, Esq.
Nixon Peabody LLP
900 Elm Street , 14th
Manchester, New Hampshire 03861