

**RULOFF, SWAIN, HADDAD,
MORECOCK, TALBERT & WOODWARD, P.C.**

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OF COUNSEL
EDWIN J. RAFAL

(757) 671-6036
October 7, 2019

Clerk,
Merrimack County Superior Court
163 North Main Street
Concord, NH 03301

Re: In the Matter of the Liquidation of
The Home Insurance Company
Docket No. 217-2003-EQ-00106

TO WHOM IT MAY CONCERN:

My office represented numerous young women who were involved in litigation back in the early '80s. We resolved their case in 1984 and as part of the resolution, they hold policies with Federal Home Life Insurance Company that were to provide them annuity payments over the next couple of decades. They have all received those payments. However, several of my clients have just received the enclosed notice concerning filing an objection to the liquidator's motion for approval of claim amendment deadline. My office had previously corresponded with Federal Home Life Insurance Company back in 2004 when this issue originally arose. I'm enclosing a copy of my partner's letter to Federal Home Life Insurance Company dated May 3, 2004, and a copy of the May 6, 2004, letter from Shunna Venable from Federal Home Life indicating that Federal Home Life Insurance Company was not part of The Home Insurance Company.

Finally, I have enclosed a copy of the Court's Order which was entered on July 20, 1984, which set out the monies due my clients. All payments have been received except for the final payment which is due on July 1, 2020. While I am assuming that I don't have to do anything to protect my clients' interests for the final payment, I wanted to make sure nothing was due from us.

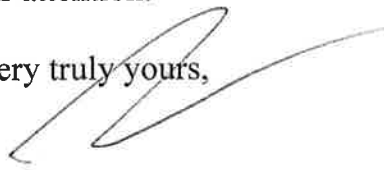
October 7, 2019

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I have also copied Shunna Venable with Federal Home Life and would ask that she confirm that the final annuity payments will be made.

Thank you very much for your attention.

Very truly yours,


Robert J. Haddad

RJH/clh

Enclosures

cc: J. Christopher Marshall, Esquire
J. David Leslie, Esquire
Ms. Shunna Venable

The Home Insurance Company, in Liquidation
61 Broadway, Sixth Floor
New York, NY 10006

**NOTICE OF DEADLINE FOR OBJECTION TO MOTION FOR
APPROVAL OF CLAIM AMENDMENT DEADLINE REGARDING
THE HOME INSURANCE COMPANY, IN LIQUIDATION**

Christina L. Townsend (Formerly Mathews)
26316 Payne Road
Blomox, VA 23308

POC No(s): CLMN474966

To Persons who have open proofs of claim in the liquidation of The Home Insurance Company ("Home"):

Home is in liquidation proceedings before the Merrimack County Superior Court of the State of New Hampshire (the "Court"), In the Matter of the Liquidation of The Home Insurance Company, Docket No. 217-2003-EQ-00106.

John R. Elias, Insurance Commissioner of the State of New Hampshire, as Liquidator ("Liquidator") of Home, has filed a Motion for Approval of Claim Amendment Deadline to set a deadline of 150 days after the Court's order granting the Liquidator's motion for the final submission of amendments to proofs of claim in the Home liquidation. As described in that motion, claims filed after the claim amendment deadline and potential claims (any claim that cannot be specifically identified by the claim amendment deadline) will be barred, and certain claimants may be required to amend their proofs of claim, if the motion is granted. The Liquidator's motion and the proposed order filed August 1, 2019 may be found in the Home liquidation file in the Merrimack County Superior Court Files section of the Home Liquidation Clerk website, www.hicilclerk.org, and also on the Claim Amendment Deadline Filings page of that website at <http://www.hicilclerk.org/Hicil.nsf/CADFilings?readform>.

The Court has set a deadline of November 18, 2019 for the filing of any objections to the Liquidator's Motion for Approval of Claim Amendment Deadline. Any objections to the motion shall be filed on or before November 18, 2019 with the Clerk, Merrimack County Superior Court, 163 North Main Street, Concord, New Hampshire 03301 in In the Matter of the Liquidation of The Home Insurance Company, Docket No. 217-2003-EQ-00106.

Copies of any objection shall also be served on counsel for the Liquidator: J. Christopher Marshall, Civil Bureau, New Hampshire Department of Justice, 33 Capitol Street, Concord, NH 03301-6397 and J. David Leslie/Eric A. Smith, Rackemann, Sawyer & Brewster, 160 Federal Street, Boston, MA 02110-1700.

**John R. Elias, New Hampshire Insurance Commissioner,
as Liquidator of The Home Insurance Company**

SHUTTLEWORTH, RULOFF, GIORDANO & SWAIN, P.C.

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4525 SOUTH BOULEVARD
SUITE 300
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TELEPHONE: (757) 873-9999
FACSIMILE: (757) 873-9758

(757) 671-6020

Direct E-Mail: tshuttleworth@srgslaw.com

Ref: 90-101-01

May 3, 2004

Federal Home Life Insurance Co.
Annuity Service Department
Post Office Box 6158
700 Main Street
Lynchburg, Virginia 24505-61589

Copy

RE: *Annuities*

Dear Sir/Madam:

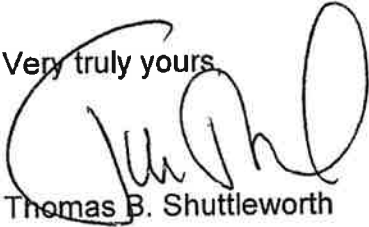
I represent twelve young girls who hold policies with the Federal Home Life Insurance Company. I am enclosing a list of the people and their policy numbers. Also, I am enclosing a copy of an Order which was entered in the United States District Court for the Eastern District of Virginia on July 20, 1984. One of the young ladies recently contacted me and informed me that they had received a Notice regarding The Home Insurance Company in Liquidation. My review of the documentation sent to her does not indicate that Federal Home Life Insurance Company is included in liquidation with The Home Insurance Company.

The purpose of this letter is to inquire of you if, in fact, Federal Home Life Insurance Company has been merged into The Home Insurance Company. As you can see, The Home Insurance Company guaranteed all the payments of the Federal Home Life Insurance Company and the purpose of this letter is to attempt to sort out exactly what the situation is, so I can properly protect my clients' rights.

SHUTTLEWORTH, RULOFF, GIORDANO & SWAIN, P.C.

Federal Home Life Insurance Co.
Annuity Service Department
May 3, 2004
Page Two

I would appreciate a prompt response. Thanking you in advance for your cooperation,
I am

Very truly yours,

Thomas B. Shuttleworth

TBS:cdv
Enclosures

cc: Ms. Janet Bernard
Mrs. Rhonda Burford (Formerly Taylor)
Mrs. Laura Colona (Formerly Hurst)
Mrs. Amy Porter Drummond
Mrs. Karen Herring (Formerly Wessells)
Ms. Karen Hoover
Mrs. Tanya Justice (Formerly Smullin)
Ms. Jessica Mears
Ms. Kisha Riddick
Mrs. Amber Susan Rose (Formerly Thornes)
Mrs. Jaime Anne Selinsky (Formerly Wessells)
~~Mrs. Christina L. Townsend (Formerly Mathews)~~

ANNUITIES

Janet Bernard	016253284A
Rhonda Burford (Formerly Taylor)	016253280A
Laura Colona (Formerly <i>Hurst</i>)	016253281A
Amy Porter Drummond	016253282A
Karen Herring (Formerly Wessells)	016253285A
Karen Hoover	016253287A
Tanya M. Justice (Formerly Smullin)	016253279A
Jessica Mears	016253530A
Kisha Riddick	016253288A
Amber S. Rose (Formerly Thornes)	016253289A
Jamie A. Selinsky (Formerly Wessells)	016253283A
Christina L. Townsend (Formerly Mathews)	016253286A



Federal Home Life Insurance Company
Annuity Service Center, P. O. Box 6158
Lynchburg, VA 24505-6158
Toll Free (888) 322-4629

May 6, 2004

Shuttleworth, Ruloff, Giordano & Swain, P.C.
Attn: Thomas B. Shuttleworth
Southport Centre
4525 South Boulevard Suite 300
Virginia Beach VA 23452-1147

Re: Annuity Contract Numbers: 016253284A, 016253280A, 016253281A, 016253282A,
016253285A, 016253287A, 016253279A, 016253530A, 016253288A, 016253289A,
016253283A, 016253286A

Annuitants: Janet Bernard, Rhonda Taylor, Laura Hurst, Amy Porter Drummond,
Karen Herring, Karen Hoover, Tanya Smullin, Jessica Mears, Kisha Riddick,
Amber Thornes, Jamie Selinsky, Christina Mathews

Dear Mr. Shuttleworth:

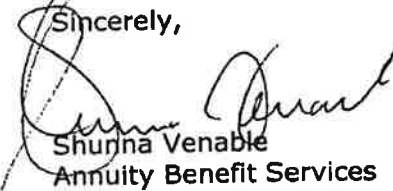
This correspondence is being sent to you in response to your letter dated May 3, 2004.

Please be advised that Federal Home Life Insurance Company has not merged nor is it planning to merge with The Home Insurance Company. Federal Home Life Insurance Company is the administrator of the annuity payments for all contracts referenced above and is a separate entity from The Home Insurance Company.

The Home Insurance Company will continue to remain the annuity contract owner for all contracts listed above.

If you have any questions, please call 888-322-4629.

Sincerely,


Shurina Venable
Annuity Benefit Services

COPY

FILED IN OPEN COURT
JUL 20 1984

W. Farley Powers, Jr., Clerk
By: *[Signature]*

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division
Deputy Clerk

AMBER THORNES, an infant, et al., :
Plaintiffs, :
v. : CIVIL ACTION
ACCOMACK COUNTY SCHOOL BOARD, NO. 83-606-N
Defendants. :

ORDER APPROVING COMPROMISE SETTLEMENT
AND DISMISSING ALL CLAIMS

This matter came for hearing before the Court this day, pursuant to § 8.01-424, § 8.01-425 of the Code of Virginia (1950) as amended, for the approval of a compromise of the claims of the infant plaintiffs with the defendants Accomack County School Board, Eddie Smith, Vernon Giddens, Parker Land, P. B. Tankard, Robert L. Parker, Betty West, Fred Tolbert, Donald Fletcher, Candy Taylor, Norman Brown, William Hamilton, Jane Chandler, Ralph Bundick and Ralph Scarborough, and the infant plaintiffs Amber Thornes, Laura Hurst, Jessica Mears, Kisha Riddick, Janet Bernard, Karen

Hoover, Christina L. Matthews, Karen Wessels, Jamie Wessels,
Amy Porter, Tanya Marie Smullin, Rhonda Taylor, appearing
by a parent and next friend, their guardian ad litem, and
their attorney, Thomas B. Shuttleworth; and the said defendants
→ and the Home Insurance Companies
appearing by their attorney, William B. Eley, and for consid-

eration of the distribution of the settlement moneys. The said
HOME INSURANCE COMPANIES on its motion, is hereby ordered to be a party
THE COURT having considered all matters pertaining
to this compromise and being of the opinion that this compro-
mise is in the best interests of the infant plaintiffs
and that the requested relief should be granted, it is
accordingly, *liable pursuant to the terms hereof.*

ORDERED that this compromise be and hereby is approved;
and it is further ORDERED that the Accomack County School
Board, Eddie Smith, Vernon Giddens, Parker Land, P. B. Tankard,
Robert L. Parker, Betty West, Fred Tolbert, Donald Fletcher,
Candy Taylor, Norman Brown, William Hamilton, Jane Chandler,
Ralph Bundick and Ralph Scarborough, be and hereby are
exonerated from any further liability for any and all claims
of any nature whatsoever, known and unknown, arising out
of attendance of the infant plaintiffs at any school or
function of the Accomack County School System or arising
out of the transportation of the said infant plaintiffs
to or from such school or function at all times up to and

TBS
WBE
JWP
WBE
JWP

including the date of this Order; and it is further ORDERED
that the settlement moneys ^{payable at office of Clark and Hunt or} be distributed as follows:
its successor in Virginia Beach, Virginia

Each and every infant plaintiff shall be paid
EIGHT THOUSAND TWO HUNDRED THIRTEEN AND 33/100 DOLLARS
(\$8,213.33) on or before July 1, 1996; the sum of
EIGHT THOUSAND TWO HUNDRED THIRTEEN AND 33/100 DOLLARS
(\$8,213.33) on or before July 1, 1997; the sum of
EIGHT THOUSAND TWO HUNDRED THIRTEEN AND 33/100 DOLLARS
(\$8,213.33) on or before July 1, 1998; the sum of
EIGHT THOUSAND TWO HUNDRED THIRTEEN AND 33/100 DOLLARS
(\$8,213.33) on or before July 1, 1999; the sum of
EIGHT THOUSAND TWO HUNDRED THIRTEEN AND 33/100 DOLLARS
(\$8,213.33) on or before July 1, 2000; the sum of
FORTY-ONE THOUSAND SIX HUNDRED SIXTY-SIX AND 67/100
DOLLARS (\$41,666.67) on or before July 1, 2005; the
sum of FIFTY-TWO THOUSAND EIGHTY-THREE AND 33/100
DOLLARS (\$52,083.33) on or before July 1, 2010; the
sum of EIGHTY-THREE THOUSAND THREE HUNDRED THIRTY-THREE
AND 33/100 DOLLARS (\$83,333.33) on or before July
1, 2015; the sum of ONE HUNDRED TWENTY-FIVE THOUSAND
AND NO/100 DOLLARS (\$125,000.00) on or before July
1, 2020. In the event of the death of any infant

prior to receipt of any of the foregoing payments, all remaining payments shall be paid on the scheduled dates to her heirs at law or as directed by will.

The aforementioned payments are guaranteed by an annuity contract purchased by the said defendants' insurers from Federal Home Life Insurance Company. THE HOME INSURANCE COMPANIES shall be the owner of the annuity contract. Payments made pursuant to said contract shall operate as pro tanto discharge of those lump sum obligations set forth in the foregoing paragraphs.

THE HOME INSURANCE COMPANIES guarantees and shall be liable for the payment of all sums due under this agreement in the event that FEDERAL HOME LIFE INSURANCE COMPANIES shall for any reason fail, refuse or be unable to pay said sums.

To Clark & Stant for attorneys fees and non-taxable costs, EIGHTY THOUSAND AND NO/100 DOLLARS (\$80,000.00).

Prior to this proceeding, the Court ordered the appointment of a guardian ad litem for the infant plaintiffs, Amber Thornes, Laura Hurst, Jessica Mears, Kisha Riddick, Janet Bernard, Karen Hocver, Christina L. Matthews, Karen

Wessels, Jamie Wessels, Amy Porter, Tanya Marie Smullin,
and Rhonda Taylor, and appointed attorney JOHN PADGETT
to serve in that capacity. The Court finds that JOHN PADGETT
has discharged his responsibility to the infants and to
the Court and is entitled to a compensation for his services
in the amount of \$ 200⁰⁰.

WHEREFORE, it is ORDERED that the DEFENDANTS pay
to attorney JOHN PADGETT, the sum of \$ 200⁰⁰.

And it further appearing to the court that all matters
in controversy in the above captioned action between the
adult plaintiffs and defendants Accomack County School
Board, Eddie Smith, Vernon Giddens, Parker Land, P. B.
Tankard, Robert L. Parker, Betty West, Fred Tolbert, Donald
Fletcher, Candy Taylor, Norman Brown, William Hamilton,
Jane Chandler, Ralph Bundick and Ralph Scarborough have
been compromised to the satisfaction of all parties, and
that the adult plaintiffs have executed a Release to the
defendants, it is

ORDERED that the adult plaintiffs' claims herein
against defendants Accomack County School Board, Eddie
Smith, Vernon Giddens, Parker Land, P. B. Tankard, Robert
L. Parker, Betty West, Fred Tolbert, Donald Fletcher, Candy
Taylor, Norman Brown, William Hamilton, Jane Chandler,

Ralph Bundick and Ralph Scarborough be, and hereby are,
DISMISSED with prejudice and this entire case is hereby
dismissed from the Court's docket.

Enter this 30th day of July, 1984.

John G. Adelman
United States District Court Judge

WE ASK FOR THIS:

Thomas B. Shuttlesworth
Counsel for Plaintiffs

Wm. B. Eley
Counsel for Defendants

John D. Padgett
Guardian ad litem

Wm. B. Eley
Counsel for, Some Insurance Companies,
separately created for purposes of
proceeding to be a party hereto and
agreed to be bound hereby.