MERRIMACK, SS.

SUPERIOR COURT

Docket No. 217-2003-EQ-00106

In the Matter of the Liquidation of The Home Insurance Company

AFFIDAVIT OF PETER A. BENGELSDORF, SPECIAL DEPUTY LIQUIDATOR, IN SUPPORT OF MOTION TO STRIKE JOHNSON & JOHNSON'S OBJECTION TO LIQUIDATOR'S MOTION FOR APPROVAL OF CLAIM AMENDMENT DEADLINE

- I, Peter A. Bengelsdorf, hereby depose and say:
- 1. I was appointed Special Deputy Liquidator of the Home Insurance Company ("Home") by the Insurance Commissioner of the State of New Hampshire, as Liquidator ("Liquidator") of Home. I submit this affidavit in support of the Liquidator's Motion to Strike and Response to Johnson & Johnson's Objection to Liquidator's Motion for Approval of Claim Amendment Deadline. The facts and information set forth are either within my own knowledge gained through my involvement with this matter, in which case I confirm that they are true, or are based on information provided to me by others, in which case they are true to the best of my knowledge, information, and belief.
- 2. On August 1, 2019, the Liquidator filed the Liquidator's Motion for Approval of Claim Amendment Deadline ("Motion"), together with the Liquidator's Motion for Order of Notice Regarding Motion for Approval of Claim Amendment Deadline.
- 3. On August 19, 2019, the Court issued its Order of Notice Regarding Liquidator's Motion for Approval of Claim Amendment Deadline ("Order of Notice"). A copy of the Order of Notice is attached as Exhibit 1. The Order of Notice ordered that "[a]ny objections to the Motion shall be filed on or before the date 90 days from the date of this Order (or, if that date is a

Saturday, Sunday or holiday, the next business day) with the Clerk, Merrimack County Superior Court. Order of Notice ¶ 2. As the date 90 days from August 19, 2019 was November 17, 2019, which was a Sunday, the Order of Notice established November 18, 2019 as the deadline for submission of objections to the Motion.

- Among other things, the Order of Notice approved a form of notice, directed the Liquidator to mail the notice to claimants with open proofs of claim (as defined in the Order of Notice) within 30 days, and directed the Liquidation Clerk to promptly post the Motion, the Order of Notice, and the notice on the Liquidation Clerk website, <a href="www.hicilclerk.org">www.hicilclerk.org</a>. Order of Notice ¶ 3, 6. Among other things, the Order of Notice approved a form of notice and directed the Liquidator to mail the notice to claimants with open proofs of claim (as defined in the Order of Notice) within 30 days from receipt of the Order of Notice. Order of Notice ¶ 3. The Order of Notice also directed the Liquidation Clerk to promptly post the Motion, the Order of Notice and the notice in the Merrimack County Superior Court Files section of the Home Liquidation Clerk website (<a href="www.hicilclerk.org">www.hicilclerk.org</a>). Order of Notice ¶ 6.
- 4. The Liquidator completed the notice by inserting the November 18, 2019 deadline date and the link to the Motion as posted on the Liquidation Clerk's website and mailed the notice as directed in the Order of Notice. The Liquidator also arranged for the Liquidation Clerk to post the Motion (posted on August 1, 2019), the Order of Notice (posted on August 26, 2019), and the notice (posted on September 17, 2019). See Liquidator's Certificate of Compliance with Order of Notice Regarding Motion for Approval of Claim Amendment Deadline ¶ 2, 4 (filed September 19, 2019) ("Certificate"). A copy of the Certificate is attached as Exhibit 2. A copy of the completed notice used for the mailing and posted to the website is attached as Exhibit A to the Certificate.

- 5. More specifically, after the Court issued the Order of Notice on August 19, 2019, counsel for the Liquidator completed the notice by inserting the date of the deadline and link to the Liquidation Clerk website where the Motion could be found. Liquidation staff under my direction prepared a mailing list spreadsheet listing the names, addresses and proof of claim ("POC") numbers of claimants and counsel for claimants with open proofs of claim (as defined in the Order of Notice). The list totaled 2,186 claimants and counsel, 2057 with addresses in the United States and 129 with addresses outside the United States.
- 6. The Liquidator engaged NH Print & Mail Services in Concord, N.H., to make the mailing. Liquidation staff provided NH Print & Mail Services with the form of notice and mailing list spreadsheet. As described more fully in the Affidavit of Janice Oliver of NH Print & Mail Services, NH Print & Mail Services printed the names and addresses of the claimants and counsel and the POCs numbers from the spreadsheet on the notice and mailed the notices to the claimants and counsel listed on the spreadsheet in envelopes with a return address and the legend "Important-Notice re Motion for Approval of Claim Amendment Deadline". NH Print & Mail Services mailed the notice to 2,186 claimants and counsel, 129 claimants and counsel with addresses outside the United States by first class mail—international, postage prepaid, on September 12, 2019 and 2,057 claimants and counsel with addresses in the United States by first class mail, postage prepaid, on September 13, 2019.
- 7. Johnson & Johnson ("J&J") submitted its proof of claim form on June 19, 2019. A copy of J&J's proof of claim without its attachment is attached as Exhibit 3. J&J's proof of claim provided an address for Johnson & Johnson care of its counsel, Thomas W. Ladd. It did not provide an address for J&J itself. See Exhibit 3.
- 8. The mailing list spreadsheet used by NH Print & Mail Services to make the mailing included the address for Johnson & Johnson care of Mr. Ladd. Pages 1, 9, 25 and 31

from the 90 page mailing list spreadsheet with claimant information redacted are attached as Exhibit 4. The address for Johnson & Johnson is on page 25. The mailing list spreadsheet also included four other addressees at McCarter & English in Newark, New Jersey at pages 9 and 31. See Exhibit 4. The address for Johnson & Johnson care of Mr. Ladd on the spreadsheet and on the proof of claim are the same. Compare Exhibits 3 and 4.

9. Liquidation staff have maintained a list of the notices of the deadline that were returned to the Liquidator as undeliverable. The notice mailed to Johnson & Johnson care of Mr. Ladd has not been returned. The notices mailed to the four other addressees at McCarter & English also have not been returned.

Peter A. Bengelsdorf

Special Deputy Liquidator of The Home Insurance

Company

STATE OF NEW YORK COUNTY OF NEW YORK

Subscribed and sworn to, before me, this Z/2 day of January, 2020.

Notary Public/Justice of the Peace

Nelly M. Gomez-Ramirez
Notary Public State of New York
No. 01GO5005271
Qualified in Bronx County

Commission Expires\_\_\_

4

MERRIMACK, SS.

**SUPERIOR COURT** 

Docket No. 217-2003-EQ-00106

In the Matter of the Liquidation of The Home Insurance Company

PROPOSEDI-

## ORDER OF NOTICE REGARDING LIQUIDATOR'S MOTION FOR APPROVAL OF CLAIM AMENDMENT DEADLINE

John R. Elias, Insurance Commissioner of the State of New Hampshire, as Liquidator ("Liquidator") of The Home Insurance Company ("Home"), has filed a motion for an order of notice concerning the Liquidator's Motion for Approval of Claim Amendment Deadline (the "Motion") and a deadline for submission of any objection to the Motion. On consideration of the motion for order of notice, the Court hereby orders as follows:

- 1. The Liquidator's motion for an order of notice is granted.
- 2. Any objections to the Motion shall be filed on or before the date 90 days from the date of this Order (or, if that date is a Saturday, Sunday or holiday, the next business day) 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 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.
- 3. Within 30 days from receipt of this Order, the Liquidator shall mail notice of the Motion and the deadline for objections in the form attached to this Order to all claimants who

have open proofs of claim in the Home liquidation. Open proofs of claim means those on which (a) there has been no determination, (b) there has been only a partial determination or determinations, (c) there has been a determination that has not yet been approved by the Court, (d) there has been a determination as to priority but deferral as to amount, or (e) there has been a determination that provided that the claimant could submit further claims. Notice shall be mailed to the latest mailing address provided to the Liquidator by the claimant. Where the claimant is represented by counsel, notice shall be mailed to both the claimant and counsel using the latest mailing addresses provided to the Liquidator by the claimant or counsel. Notice shall be mailed by first class mail, postage prepaid, except that notice to claimants or counsel with addresses outside the United States shall be sent by air mail, postage prepaid.

- 4. Notice shall not be mailed to claimants whose proofs of claim have been finally determined by approval of a Liquidator's report of claims and recommendations or by approval of a settlement.
- 5. In addition to the mailing to claimants with open proofs of claim, the Liquidator shall email notice of the Motion and the deadline for objections in the form attached to this Order to the United States Department of Justice.
- 6. The Liquidation Clerk shall promptly post the Motion, this Order, and the notice in the Merrimack County Superior Court Files section of the Home Liquidation Clerk website (www.hicilclerk.org).

SO ORDERED

Datad.

Presiding Justice

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

POC No(s).:	
-------------	--

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

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"), <u>In the Matter of the Liquidation of The Home Insurance Company</u>, 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 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, at \_\_\_\_\_ [INSERT LINK TO MOTION].

The Court has set a deadline	of[INSERT DATE 90 DAYS AFTER COURT'S
ORDER OR NEXT BUSINES	SS DAY] for the filing of any objections to the Liquidator's
Motion for Approval of Clain	Amendment Deadline. Any objections to the motion shall be
filed on or before	[INSERT SAME DATE] with the Clerk, Merrimack
County Superior Court, 163 N	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.	Docket 140, 217-2003-EQ-

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

MERRIMACK, SS

SUPERIOR COURT

Docket No. 217-2003-EQ-00106

In the Matter of the Liquidation of The Home Insurance Company

#### LIQUIDATOR'S CERTIFICATE OF COMPLIANCE WITH ORDER OF NOTICE REGARDING MOTION FOR APPROVAL OF CLAIM AMENDMENT DEADLINE

John R. Elias, Insurance Commissioner of the State of New Hampshire, as Liquidator ("Liquidator") of The Home Insurance Company ("Home"), hereby certifies that he has complied with the Order of Notice Regarding Liquidators Motion for Approval of Claim Amendment Deadline dated August 19, 2019 (the "Order of Notice") as follows:

- 1. The Order of Notice established November 18, 2019 (the business day after the 90th day from the date of the Order of Notice, which was a Sunday) as the deadline for objections to the Liquidator's Motion for Approval of Claim Amendment Deadline (the "Motion"). Order of Notice ¶ 2.
- 2. The Order of Notice directed that within 30 days of receipt of the Order of Notice the Liquidator shall mail notice of the Motion and the deadline for objections in the form attached to the Order of Notice to all claimants who have open proofs of claim (as defined in the Order of Notice) in the Home liquidation. Order of Notice ¶ 3. The Liquidator received the Order of Notice on August 23, 2019. The Liquidator completed the form of notice approved in the Order of Notice by adding the deadline for objections and a link to the Motion as shown on Exhibit A hereto. On September 13, 2019, the Liquidator finished mailing the completed notice to claimants with open proofs of claim (as defined in the Order of Notice) and, where applicable, the claimants' counsel at the latest mailing addresses provided to the Liquidator by the claimant

or counsel. Notice was mailed to 129 claimants and counsel with addresses outside the United States by first class mail – international (air mail), postage prepaid, on September 12, 2019. Notice was mailed to 2,057 claimants and counsel with addresses in the United States by first class mail, postage prepaid, on September 13, 2019.

- 3. The Order of Notice also directed that the Liquidator shall email notice of the Motion and the deadline for objections in the form attached to the Order of Notice to the United States Department of Justice. Order of Notice ¶ 4. The Liquidator's counsel emailed the completed notice to counsel at the United States Department of Justice on September 16, 2019.
- 4. The Order of Notice also directed that the Liquidation Clerk promptly post the Motion, the Order of Notice, and the approved notice in the "Merrimack County Superior Court Files" section of the Home Liquidation Clerk website. Order of Notice ¶6. The Motion was posted in the Merrimack County Superior Court Files section of the Home Liquidation Clerk website on August 1, 2019, and the Order of Notice was posted on August 26, 2019. The completed notice as used in the mailing was posted on September 17, 2019. For ease of reference, duplicates of these documents and related papers have also been posted to a new "Claim Amendment Deadline Filings" section of the website. Any further filings regarding the Motion will be posted in both sections of the website.

Respectfully submitted,

JOHN R. ELIAS, INSURANCE COMMISSIONER OF THE STATE OF NEW HAMPSHIRE, SOLELY AS LIQUIDATOR OF THE HOME INSURANCE COMPANY,

By:

Peter A. Bengelsdorf

Special Deputy Liquidator

Date: September 18, 2019

#### **Certificate of Service**

I hereby certify that a copy of the foregoing Liquidator's Certificate of Compliance with Order of Notice Regarding Motion for Approval of Claim Amendment Deadline was sent, this 19th day of September, 2019, by first class mail, postage prepaid to all persons on the attached service list.

Eric A. Smith

NH Bar ID No. 16952

#### MERRIMACK, SS.

#### SUPERIOR COURT

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

#### SERVICE LIST

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, Illinois 60606

Samantha D. Elliott, 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

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, 22<sup>nd</sup> Floor San Francisco, California 94111

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

Robert M. Horkovich, Esq. Robert Y. Chung, Esq. Anderson Kill & Olick, P.C. 1251 Avenue of the Americas New York, New York 10020 John A. Hubbard 615 7<sup>th</sup> Avenue South Great Falls, Montana 59405

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

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

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

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

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, 14<sup>th</sup> Floor Manchester, New Hampshire 03861

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

Michael S. Lewis, Esq. Rath Young Pignatelli One Capital Plaza Concord, New Hampshire 03302-1500 Michael J. Tierney, Esq. Wadleigh, Starr & Peters, PLLC 95 Market Street Manchester, New Hampshire 03101

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

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

Michel Y. Horton, Esq. Morgan, Lewis & Bockius LLP 300 South Grand Avenue, 22<sup>nd</sup> Floor Los Angeles, California 90071

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

#### 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

POC No(s	).:
----------	-----

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, <a href="https://www.hicilclerk.org">www.hicilclerk.org</a>, and also on the Claim Amendment Deadline Filings page of that website at <a href="http://www.hicilclerk.org/Hicil.nsf/CADFilings?readform">http://www.hicilclerk.org/Hicil.nsf/CADFilings?readform</a>.

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

### PROOF OF CLAIM The Home Insurance Company,

Please print or type

Merrimack County Superior Court, State of New Hampshire 03-E-0106 Read Carefully Before Completing This Form POR LIQUIDATOR'S CONTROLL OF CLAIM RECEIVED

JUN 1 9 7019

HICIL

The Deadline for Filing this Form is June 13, 2004.

You should file this Proof of Claim form if you have an <u>actual or potential claim</u> against The Home Insurance Company of any of its former subsidiaries\* ("The Home") <u>even if the amount of the claim is presently uncertain</u>. To have your claim considered by the Liquidator, this Proof of Claim must be postmarked no later than <u>June 13, 2004</u>. Failure to timely return this completed form will likely result in the <u>DENIAL OF YOUR CLAIM</u>. You are advised to retain a copy of this completed form for your records.

1,::	Claimant's Name:	Johnson & Johnson	If your name, address.
2.	Claimant's Address:	c/o Thomas W Ladd, Esq , McCarter & English LLP	e-mail address, or telephone
		Four Gateway 100 Mulberry Street, Newark, NJ 07102	number set furth above are incorrect, or if they change,
3	Fax Number: (		you must notify the Liquidator so she can advise you of new information.
	Email address: Ilado	@mccarter.com	
4.	Claimant's Social Sec	urity Number, Tax ID Number or Employer ID Number:	mil — In design approximentation of controllar design design and resource assumptions assume assume —
5.	b)Third Party C c)Employee or d)Broker or Ag e)General Cred f)State or Loca	or former policyholder laimant making a claim against a person insured by The Hoi former employee ent tor, Reinsurer, or Reinsured	ne
SUDD	cribe in detail the nature	of your claim. You may attach a separate page if desired. A	ing documentation.
7.	5 unknown  If you have any securion mentation	ocumentation to allow for determination of the claim amount if amount is unknown, write the word "unknown").  y backing up your claim, describe the nature and amount of	
dates	If The Home has made	any payments towards the amount of the claim, describe the	amount of such payments and the
),	Is there any setoff, cou	nterclaim, or other defense which should be deducted by Th	Home from your claim?
0.	Do you claim a priority	for your claim? If so, why: No	and recovery the first transport of the state of the stat
	Name: Thomas W L Address: McCarter & Four Gatew Phone Number ( 973	English LLP ay Center, 100 Mulberry Street, Newark, NJ 07102 j 622 4444	s form.
	Email address tlade	@mccarter com	
The	Home Indemnity Compa	ly. The Home Insurance Company of Indiana, City Insurance Com	pany, Home Lloyds Insurance Company

of Texas. The Home Insurance Company of Illinois, and The Home Insurance Company of Wisconsin

	counsel, please supply the followin	g information:	
<ol> <li>Name of attorney:</li> </ol>	Thomas W Ladd		
b Name of law firm;			
<ul> <li>c. Address of law firm</li> </ul>	n: Four Gateway Center, 100 Mulbi	arry Street	
	Newark, NJ 07102		
d. Attorney's telephor	IC: 9/3 022 4444	The same of the sa	
e. Attorney's fax num	ber: 973,297 3890	The Control of State of the Control of the State of the S	
f. Attorney's email ac	dress: tladd@mccarter.com	**************************************	
		The second secon	
3. If using a judgment ag	ainst The Home as the basis for this	claim:	
a. Amount of judgmen	nt	= -	
b. Date of judgment			
c. Name of case			
d. Name and location	of court		
e. Court docket or ind	ex number (if any)		•
	w nones (ii miy)		
4. If you are completing t	his Proof of Claim as a Third Party (	Uniment against up incured of The	Home was must
onditionally release your ch	im against the insured by signing the	e following as required by Al H.	Paul Stat. Ann. R 400 C-40 L
,	and against are timested by anguing a	ie tollowing, as required by 14.11.	Nev. Stat. Allit 9 402-C:40 1:
ſ	(inse		
claim against The U		ar claudant's name), in consucri	ation of the right to bring a
armin affective tite fit			
and the second second second	ome, on behalf of myself, my	officers, directors, employees,	0400000111, 110113, 4331B113,
administrators, executo	rs, and personal representatives here	by release and discharge	(incert
administrators, executo	rs, and personal representatives here	by release and discharge	(incert
name of defendant(s) i	rs, and personal representatives here nsured by The Home), and his/her	by release and discharge	s successors heirs assigns
name of defendant(s) i administrators, executo	rs, and personal representatives here nsured by The Home), and his/her rs, and personal representatives, fro	by release and discharge rits officers, directors, employee, m liability on the cause(es) of ac	(insert
administrators, executo name of defendant(s) i administrators, executo my claim against The	rs, and personal representatives here nsured by The Home), and his/her rs, and personal representatives, fro Home in the amount of the limit	by release and discharge  /its officers, directors, employee  om liability on the cause(es) of ac  of the applicable policy provide	(insert s, successors heirs, assigns, stion that forms the basis for
administrators, executo name of defendant(s) i administrators, executo my claim against The	rs, and personal representatives here nsured by The Home), and his/her rs, and personal representatives, fro Home in the amount of the limit	by release and discharge  /its officers, directors, employee  om liability on the cause(es) of ac  of the applicable policy provide	(insert s, successors heirs, assigns, stion that forms the basis for
administrators, executo name of defendant(s) i administrators, executo my claim against The	rs, and personal representatives here nsured by The Home), and his/her rs, and personal representatives, fro	by release and discharge  its officers, directors, employee im liability on the cause(es) of ac of the applicable policy provide	(insert s, successors heirs, assigns, stion that forms the basis for
administrators, executo name of defendant(s) i administrators, executo my claim against The however, that this release	rs, and personal representatives here nsured by The Home), and his/her rs, and personal representatives, fro. Home in the amount of the limit see shall be void if the insurance covered to the see that	by release and discharge  its officers, directors, employee im liability on the cause(es) of ac of the applicable policy provide	(insert s, successors heirs, assigns, stion that forms the basis for
administrators, executo name of defendant(s) i administrators, executo my claim against The	rs, and personal representatives here nsured by The Home), and his/her rs, and personal representatives, fro. Home in the amount of the limit see shall be void if the insurance covered to the see that	by release and discharge  its officers, directors, employee im liability on the cause(es) of ac of the applicable policy provide	(insert s, successors heirs, assigns, stion that forms the basis for
administrators, executo name of defendant(s) i administrators, executo my claim against The however, that this release Claimant's signature	rs, and personal representatives here nsured by The Home), and his/her res, and personal representatives, from the in the amount of the limit is shall be void if the insurance covered to the second of the insurance covered to the second of the insurance covered to the in	by release and discharge  /its officers, directors, employee, im liability on the cause(cs) of ac of the applicable policy provide  rrage provided by The Home is av	(insert s, successors heirs, assigns, stion that forms the basis for
administrators, executo name of defendant(s) is administrators, executo my claim against The however, that this release Claimant's signature All claimants must con	rs, and personal representatives here nsured by The Home), and his/her rs, and personal representatives, fro Home in the amount of the limit see shall be void if the insurance coverage to the seed of the home in the seed of the insurance coverage to the following:	by release and discharge  fits officers, directors, employees  in liability on the cause(es) of ac  of the applicable policy provide  trage provided by The Home is av  Date	(insert s, successors, heirs, assigns, tion that forms the basis for ed by The Home; provided, oided by the Liquidator
administrators, executo name of defendant(s) i administrators, executo my claim. against The however, that this release Claimant's signature All claimants must cont, Thomas W Ladd	rs, and personal representatives here neared by The Home), and his/her rs, and personal representatives, from Home in the amount of the limit see shall be void if the insurance coverage to the following:	by release and discharge //its officers, directors, employee. m liability on the cause(es) of ac of the applicable policy provide grage provided by The Home is av  Date	(insert s, successors, heirs, assigns, tion that forms the basis for ed by The Home; provided, oided by the Liquidator
administrators, executo name of defendant(s) is administrators, executo my claim. against The however, that this release Claimant's signature All claimants must continue to the competition of the competi	rs, and personal representatives here insured by The Home), and his/her rs, and personal representatives, fro Home in the amount of the limit te shall be void if the insurance cove inplete the following:  (inser- form for a legal entity) subscribe and	thy release and discharge  vits officers, directors, employees m liability on the cause(es) of ac of the applicable policy provide  rage provided by The Home is av  Date  t individual claimant's name or na	(insert s, successors, heirs, assigns, etion that forms the basis for ed by The Home; provided, oided by the Liquidator  Any person who knowingly files a statement of claim.
administrators, executo name of defendant(s) is administrators, executo my claim. against The however, that this release Claimant's signature All claimants must continue to the competition of perjury as follows: the name of defendance is the competition of perjury as follows: the name of defendance is the competition of perjury as follows: the name of defendance is the competition of perjury as follows: the name of defendance is the competition of defendance	rs, and personal representatives here insured by The Home), and his/her rs, and personal representatives, fro Home in the amount of the limit is shall be void if the insurance cove inplete the following:  (inser- form for a legal entity) subscribe and at I have read the foregoing proof o	thy release and discharge  vits officers, directors, employees m liability on the cause(es) of ac of the applicable policy provide  rage provided by The Home is av  Date  t individual claimant's name or na	(insert s, successors, heirs, assigns, etion that forms the basis for ed by The Home; provided, oided by the Liquidator  Any person who knowingly files a statement of claim.
administrators, executo name of defendant(s) i administrators, executo my claim. against The however, that this release Claimant's signature All claimants must contain the completing this i of perjury as follows: the that this claim in the am	rs, and personal representatives here nsured by The Home), and his/her rs, and personal representatives, fro- Home in the amount of the limit se shall be void if the insurance cove  inplete the following:  (inser- form for a legal entity) subscribe and at I have read the foregoing proof of ount of unknown	by release and discharge  its officers, directors, employees in liability on the cause(es) of ac of the applicable policy provide  trage provided by The Home is av  Date  t individual claimant's name or na d affirm as true, under the penalty f claim and know the contents to the	(insert s, successors, heirs, assigns, stion that forms the basis for ad by The Home; provided, oided by the Liquidator  Any person who knowingly files a statement of claim containing any false or misleading
administrators, executo name of defendant(s) is administrators, executo my claim, against The however, that this release Claimant's signature All claimants must cont. Thomas W Ladd person completing this for perjury as follows: the that this claim in the am (\$ unknown)	rs, and personal representatives here naured by The Home), and his/her rs, and personal representatives, for Home in the amount of the limit se shall be void if the insurance coverage in the se shall be void if the insurance coverage in the following:  (insertion for a legal entity) subscribe and at I have read the foregoing proof or ount of unknown  against The Home is justly owed.	by release and discharge  //its officers, directors, employee.  m liability on the cause(es) of ac  of the applicable policy provide  rage provided by The Home is av  Date  t individual claimant's name or na  d affirm as true, under the penalty  f claim and know the contents ther  dolla  except as stated in item 9 above	s, successors. heirs, assigns, stion that forms the basis for and by The Home; provided, oided by the Liquidator  Any parson who knowingly files a statement of claim containing any false or misleading information is
administrators, executo name of defendant(s) is administrators, executo my claim: against The however, that this release Claimant's signature All claimants must combine the completing this of perjury as follows: the this claim in the am (\$ unknown that the matters set forth	rs, and personal representatives here insured by The Home), and his/her is, and personal representatives, for Home in the amount of the limit is shall be void if the insurance coverage in the following:  (insertion for a legal entity) subscribe and at I have read the foregoing proof or ount of unknown  ) against The Home is justly owed in this Proof of Claimage true to the	by release and discharge  //its officers, directors, employee.  m liability on the cause(es) of ac  of the applicable policy provide  grage provided by The Home is av  Date  t individual claimant's name or na  d affirm as true, under the penalty  claim and know the contents ther  dolla  , except as stated in item 9 above,  e best of my knowledge and belie-	(insert s, successors, heirs, assigns, stion that forms the basis for ad by The Home; provided, ooided by the Liquidator  Any person who knowingly files a statement of claim containing any false or misleading information is subject to criminal
administrators, executo name of defendant(s) is administrators, executo my claim: against The however, that this release Claimant's signature All claimants must combine the completing this of perjury as follows: the this claim in the am (\$ unknown that the matters set forth	rs, and personal representatives here insured by The Home), and his/her is, and personal representatives, for Home in the amount of the limit is shall be void if the insurance coverage in the following:  (insertion for a legal entity) subscribe and at I have read the foregoing proof or ount of unknown  ) against The Home is justly owed in this Proof of Claimage true to the	by release and discharge  //its officers, directors, employee.  m liability on the cause(es) of ac  of the applicable policy provide  grage provided by The Home is av  Date  t individual claimant's name or na  d affirm as true, under the penalty  claim and know the contents ther  dolla  , except as stated in item 9 above,  e best of my knowledge and belie-	s, successors. heirs, assigns, stion that forms the basis for and by The Home; provided, oided by the Liquidator  Any parson who knowingly files a statement of claim containing any false or misleading information is
administrators, executo name of defendant(s) is administrators, executo my claim, against The however, that this release Claimant's signature All claimants must comit, Thomas W Ladd person completing this of perjury as follows: the that this claim in the am (\$ unknown) that the mutters set forth	rs, and personal representatives here naured by The Home), and his/her rs, and personal representatives, for Home in the amount of the limit se shall be void if the insurance coverage in the se shall be void if the insurance coverage in the following:  (insertion for a legal entity) subscribe and at I have read the foregoing proof or ount of unknown  against The Home is justly owed.	by release and discharge  //its officers, directors, employee.  m liability on the cause(es) of ac  of the applicable policy provide  grage provided by The Home is av  Date  t individual claimant's name or na  d affirm as true, under the penalty  claim and know the contents ther  dolla  , except as stated in item 9 above,  e best of my knowledge and belie-	(insert s, successors, heirs, assigns, stion that forms the basis for ad by The Home; provided, ooided by the Liquidator  Any person who knowingly files a statement of claim containing any false or misleading information is subject to criminal
administrators, executo name of defendant(s) is administrators, executo my claim: against The however, that this release Claimant's signature All claimants must combine the completing this of perjury as follows: the this claim in the am (\$ unknown that the matters set forth	rs, and personal representatives here insured by The Home), and his/her is, and personal representatives, for Home in the amount of the limit is shall be void if the insurance coverage in the following:  (insertion for a legal entity) subscribe and at I have read the foregoing proof or ount of unknown  ) against The Home is justly owed in this Proof of Claimage true to the	by release and discharge  //its officers, directors, employee.  m liability on the cause(es) of act  of the applicable policy provide  trage provided by The Home is av  Date  I individual claimant's name or na  d affirm as true, under the penalty  f claim and know the contents ther  dolla  , except as stated in item 9 above,  e best of my knowledge and belief  med to a third party	(insert (insert stitum that forms the basis for the basis
administrators, executo name of defendant(s) i administrators, executo my claim. against The however, that this release Claimant's signature All claimants must complete the completing this of perjury as follows: the that this claim in the am (\$\frac{1}{2}\$ unknown that the matters set forth also certify that no particular than the control of the con	rs, and personal representatives here insured by The Home), and his/her is, and personal representatives, for Home in the amount of the limit is shall be void if the insurance coverage in the following:  (insertion for a legal entity) subscribe and at I have read the foregoing proof or ount of unknown  ) against The Home is justly owed in this Proof of Claimage true to the	by release and discharge  //its officers, directors, employee.  m liability on the cause(es) of ac  of the applicable policy provide  grage provided by The Home is av  Date  t individual claimant's name or na  d affirm as true, under the penalty  claim and know the contents ther  dolla  , except as stated in item 9 above,  e best of my knowledge and belie-	(insert (insert stitum that forms the basis for the basis
administrators, executo name of defendant(s) is administrators, executo my claim. against The however, that this release Claimant's signature All claimants must comt. Thomas W Ladd person completing this of perjury as follows: the that this claim in the am (\$ unknown) that the matters set forth	rs, and personal representatives here insured by The Home), and his/her is, and personal representatives, for Home in the amount of the limit is shall be void if the insurance coverage in the following:  (insertion for a legal entity) subscribe and at I have read the foregoing proof or ount of unknown  ) against The Home is justly owed in this Proof of Claimage true to the	by release and discharge  //its officers, directors, employee.  m liability on the cause(es) of act  of the applicable policy provide  trage provided by The Home is av  Date  I individual claimant's name or na  d affirm as true, under the penalty  f claim and know the contents ther  dolla  , except as stated in item 9 above,  e best of my knowledge and belief  med to a third party	(insert (insert stitum that forms the basis for the basis
administrators, executo name of defendant(s) i administrators, executo my claim. against The however, that this release Claimant's signature All claimants must complete the completing this if of perjury as follows: the that this claim in the am (\$\frac{1}{2}\text{ unknown} that the matters set forther also certify that no particular control of the control of	rs, and personal representatives here insured by The Home), and his/her rs, and personal representatives, for Home in the amount of the limit is shall be void if the insurance coverage in the shall be void if the insurance coverage in the following:  (insertorm for a legal entity) subscribe and at I have read the foregoing proof or ount of unknown  against The Home is justly owed in this Proof of Claim are true to the of this claim has been sold or incise.	by release and discharge  its officers, directors, employee in liability on the cause(es) of ac of the applicable policy provide  trage provided by The Home is av  Date  I individual claimant's name or na d affirm as true, under the penalty claim and know the contents the dolla , except as stated in item 9 above, e best of my knowledge and belief and to a third party	(insert (insert stitum that forms the basis for the basis
administrators, executo name of defendant(s) i administrators, executo my claim. against The however, that this release Claimant's signature All claimants must complete the completing this is of perjury as follows: the that this claim in the am (\$\frac{1}{2}\) unknown that the matters set forthed also certify that no particular than the control of t	rs, and personal representatives here insured by The Home), and his/her is, and personal representatives, for Home in the amount of the limit is shall be void if the insurance coverage in the following:  (insertion for a legal entity) subscribe and at I have read the foregoing proof or ount of unknown  ) against The Home is justly owed in this Proof of Claimage true to the	by release and discharge  its officers, directors, employee in liability on the cause(es) of ac of the applicable policy provide  trage provided by The Home is av  Date  I individual claimant's name or na d affirm as true, under the penalty claim and know the contents the dolla , except as stated in item 9 above, e best of my knowledge and belief and to a third party	(insert (insert stitum that forms the basis for the basis
administrators, executo name of defendant(s) is administrators, executo my claim, against The however, that this release Claimant's signature All claimants must combine the completing this of perjury as follows: the this claim in the amount of the claim in the amount of the completing that the matters set forth also certify that no particular control of the completed Proceedings of the completed Procedure of the complete of the completed Procedure of the complete of the compl	rs, and personal representatives here insured by The Home), and his/her is, and personal representatives, for Home in the amount of the limit se shall be void if the insurance coverage in the following:  (insertion for a legal entity) subscribe and at I have read the foregoing proof or ount of unknown  ) against The Home is justly owed in this Proof of Claim are true to the of this claim has been sold or insign of the foregoing proof of this claim has been sold or insign of the foregoing proof of this claim has been sold or insign of the foregoing proof of this claim has been sold or insign of the foregoing proof of Claim are true to the foregoing proof of Claim proof of Claim are true to the foregoing proof of Claim proof of Cl	by release and discharge  its officers, directors, employee in liability on the cause(es) of ac of the applicable policy provide  trage provided by The Home is av  Date  I individual claimant's name or na d affirm as true, under the penalty claim and know the contents the dolla , except as stated in item 9 above, e best of my knowledge and belief and to a third party	(insert (insert stitum that forms the basis for the basis
administrators, executo name of defendant(s) is administrators, executo my claim: against The however, that this release Claimant's signature.  All claimants must complete the completing this of perjury as follows: the that this claim in the am (s, unknown that the matters set forth also certify that no particular of the completed Proceedings of the completed Procedure Send this completed Procedure is administrative of the completed Procedure in the completed Procedure is administrative of the completed Procedure in the complete in the	rs, and personal representatives here insured by The Home), and his/her rs, and personal representatives, for Home in the amount of the limit is shall be void if the insurance coverage in the shall be void if the insurance coverage in the following:  (insertorm for a legal entity) subscribe and at I have read the foregoing proof or ount of unknown  against The Home is justly owed in this Proof of Claim are true to the of this claim has been sold or incise.	by release and discharge  its officers, directors, employee in liability on the cause(es) of ac of the applicable policy provide  trage provided by The Home is av  Date  I individual claimant's name or na d affirm as true, under the penalty claim and know the contents the dolla , except as stated in item 9 above, e best of my knowledge and belief and to a third party	(insert (insert stitum that forms the basis for the basis

P.O. Box 1720

Manchester, New Hampshire 03105-1720

You should complete and send this form if you believe you have an <u>actual or potential claim</u> against The Home <u>even if the amount of the claim is presently uncertain.</u>

		Exhibit 4	Exhibit B
<u>G</u>	CLAIMANT INFORMATION	REDACTED	
RE Related POCs			
Main POC NUM		- 5	1497 DONESTIC WO BACK PAGE (2)
City, State, Zip			S60 DONESTIC W BACK PAGE 149
Cleiment Mailing Name		2.5 2.0 3.0 3.3 3.3 3.3 3.3 3.3 3.3 3.3 3.3 3	BACK PAGE 114 FOREIGN WO BACK PAGE
2 c 4 c o v a c c c c 4 c o v a c c c c c a c c c c c c a c c c c c	<u> </u>	# 수 명 명 명 명 명 명 명 명 명 명	12 IN TE FOREIGN W

F Related POCs		Related POCs: INSU715190	OTHER CLAIMANT INFORMATION REDACTED	7
Main POC NUM		Page) INSU715189 (See Back Page)		W.C.
Address 2 City, State, Zip		Mcarter & English Lip Four Gateway, Newark, NJ 07102 100 Mulberry St		W BACK PAGE , 1497 DONESTIC WO BACK PAGE 'U
Name Address 1		C/O Thomas W Ladd Esq		H 4 P H 15 FOREIGN W BACK PAGE 114 FOREIGN WO BACK PAGE   560 DOMESTIC W BACK PAGE
A Claimant Mailling Name	28 8 33 33 28 28 38 38	236 238 Johnson & Johnson 248 241	245 246 246 246	H 4 P M 15 FOREIGN W BAC

-		ſ					
9	Retated POCs	c c c	CLAIMANT	INFORMATION	REDACTED		
	Rel	1			REDACTED		
L.	꿆						a
Ш	Main POC NUM						
0	City, State, Zip		Newark, NJ 07102-4056 Newark, NJ 07102-4056 Newark, NJ 07102-4056				D
	-		Newark, Newark, I Newark, I				1497 DONES TIC WO BACK PAGE
	182						DONES TIC W
S	Address 2		100 Mulberry Straet 100 Mulberry Straet 100 Mulberry Straet				
			100 M 100 M				TIC W BACK
	18		, Esq., Esq., Re: :sq., Re:				560 DOMES
8	Address 1	· Mag	Attn: Adam Budesheim, Esq., Attn: Adam Budesheim, Esq., Re: / Attn: Cynthia S. Betz, Esq., Re:				BACK PAGE
			Atin: Ada Atin: Ada I Atin: Cym				FOREIGN WO
	у Мате						PAGE . 114
W. Company	Claiment Malling Name		319. IMcCarter & English LLP 320. IMcCarter & English LLP 321. McCarter & English LLP				129: H 4 P M 15 FOREIGN W BACK PAGE , 114 FOREIGN WO BACK PAGE , 560 DOMESTIC W BACK PAGE ,
1-1-2	E 4	255.25	9. IMCCarter & English LLP IMCCarter & English LLP IMCCarter & English LLP	• 0 1 1 1 2 2 2 1 1 1 1 1 1			• H 15 FO
1 1-12	(L) A	318	319 120 121 122 132 14 122 132 14 132 14 15 16 16 16 16 16 16 16 16 16 16 16 16 16	32, 23	<u> </u>	328	223