THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

RE SUPERIOR COURT

Docket No. 217-2003-EQ-00106

In the Matter of the Liquidation of The Home Insurance Company

MOTION WITHOUT OBJECTION OF LIQUIDATOR TO ALLOW PETER B. STEFFEN TO APPEAR BY TELEPHONE AT FEBRUARY 28, 2020 STATUS CONFERENCE

Zurich Insurance plc, German Branch and Württembergische Versicherung AG ("Objecting Creditors"), by and through their New Hampshire counsel, McLane Middleton, Professional Association, respectfully move this Court to allow co-counsel, Peter B. Steffen, to appear by telephone at the February 28, 2020 Status Conference. In support of this Motion, the Objecting Creditors state as follows:

- 1. A status conference is set for February 28, 2020 at 9:00 a.m.
- 2. Objecting Creditors would like, in addition to the undersigned counsel, to be represented by Peter B. Steffen, from the law firm of Freeborn & Peters LLP, 311 South Wacker Drive, Suite 3000, Chicago, Illinois 60606. His pro hac vice application in this matter is still pending.
- 3. Due to the significant travel time and expense that would be necessary for Attorney Steffen to appear in person, Objecting Creditors hereby request that, in addition to the physical presence of the undersigned counsel, Attorney Steffen be permitted to participate in the February 28, 2020 status conference telephonically.
- 4. The Court has a conference call line set up for the hearing already which Attorney Steffen can join.

5. The Liquidator has been contacted and has no objection to the relief requested in this Motion. The other parties on the service list were not contacted for the assent due to the limited notice of this motion.

WHEREFORE, Objecting Creditors respectfully request that the Court issue an order:

- A. Permitting Peter B. Steffen, as counsel *pro hac vice* (motion pending) to participate in the February 28, 2020 status conference telephonically; and
- B. Grant such other relief as this Court deems just and appropriate.

Respectfully submitted,

ZURICH INSURANCE PLC GERMAN BRANCH AND WUERTTEMBERGISCHE VERSICHERUNG,

By their Attorneys,

McLANE MIDDLETON,

PROFESSIONAL ASSOCIATION

Dated: February 25, 2020

By:

Mark C. Rouvalis (Bar No. 6565)

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Certificate of Service

I hereby certify that a copy of the foregoing Zurich Insurance plc German Branch's and Württembergische Versicherung AG's Motion to Allow Peter B. Steffen to appear telephonically at the February 28, 2020 status conference was sent this 25th day of February, 2020 by first class mail, postage prepaid to all persons on the attached service list.

Mark C. Rouvalis

THE STATE OF NEW HAMPSHIRE

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SUPERIOR COURT

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

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