

THE STATE OF NEW HAMPSHIRE
BEFORE THE COURT APPOINTED REFEREE
IN RE THE LIQUIDATION OF THE HOME INSURANCE COMPANY
DISPUTED CLAIMS DOCKET

In re Liquidation Number: 2015-HICIL-60 Bridgestone Americas
Tire Operations, LLC
Proof of Claim No.: INSU240739-01
Claimant Name: Bridgestone Americas Tire Operations, LLC

MOTION TO EXTEND TIME TO MAKE MANDATORY DISCLOSURES
WITH ASSENT OF THE LIQUIDATOR

NOW COMES Defendant, Bridgestone Americas Tire Operations, LLC, formerly known as The Firestone Tire & Rubber Co. (“Bridgestone”), by and through its attorneys, Wadleigh, Starr & Peters, PLLC, and moves as follows:

1. Bridgestone’s mandatory disclosures pursuant to Superior Court Rule (Civ.) 22 and Art. 14 of the Procedures Regarding Claims is November 5, 2015.
2. Due to an unanticipated delay in the receipt of a data analysis from Bridgestone’s experts, Bridgestone seeks an additional two weeks extension of the deadline to November 19, 2015.
3. Eric A. Smith, Esq., counsel to the Liquidator, assents to the relief sought herein. See N.H. R. Civ. P. 11(c).

WHEREFORE, Defendant Bridgestone Americas Tire Operations, LLC, respectfully requests that this Court:

- A. Extend the deadline for Bridgestone’s mandatory disclosures to November 19, 2015; and
- B. Grant such other and further relief as may be just and proper.

Respectfully submitted,

BRIDGESTONE AMERICAS TIRE
OPERATIONS, LLC

By its attorneys,
WADLEIGH, STARR & PETERS, PLLC

Dated: November 2, 2015

By /s/Robert E. Murphy, Jr.
Robert E. Murphy, Jr., Esq., NH Bar 1848
95 Market Street
Manchester, NH 03101
(603) 669-4140
rmurphy@wadleighlaw.com

CERTIFICATE OF SERVICE

I hereby certify that I sent a copy of the foregoing on this 2nd day of November, 2015, to
Eric A. Smith, Esq.

/s/Robert E. Murphy, Jr.
Robert E. Murphy, Jr., Esq.