

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

**BEFORE THE COURT-APPOINTED REFEREE
IN RE THE LIQUIDATION OF THE HOME INSURANCE COMPANY**

DISPUTED CLAIMS DOCKET

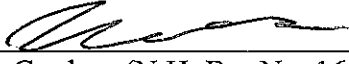
**In Re Liquidator Number: 2008-HICIL-40
Proof of Claim Number: INTL 700695-38
Claimant Name: Unionamerica Insurance
Company Limited**

ASSENTED-TO MOTION TO EXTEND TIME TO PROPOUND DISCOVERY

Claimant Unionamerica Insurance Company Limited (“Unionamerica”) respectfully requests that the deadline to to submit its discovery be extended by fifteen days, to and including September 8, 2009, and that all other deadlines – which would run from that date – remain the same. As grounds for this motion, Unionamerica states:

1. The Structuring Order dated June 15, 2009 required Century Indemnity Company (“CIC”) to a file brief summary of position. From that point, Unionamerica has 45 days to propound discovery; then CIC has 45 days to object or respond; then Unionamerica has 30 days to file its brief; then CIC has 45 days to file its brief; and then Unionamerica has 14 days to file its reply.
2. CIC submitted its summary of position, and Unionamerica’s discovery is currently due August 24, 2009. Unionamerica has nearly completed its discovery, but summer vacation schedules have prevented it from finalizing the requests. Unionamerica requests an extension of 15 days to accommodate the vacation schedule of the individuals necessary to complete the requests.
3. CIC has graciously assented to this extension of time.

WHEREFORE, Unionamerica respectfully requests that the deadline for it to submit its discovery to CIC be extended to September 8, 2009 and that all remaining deadlines run from that date.

	<p>Unionamerica Insurance Company Limited By its attorneys,</p>  <p>Joshua Gardner (N.H. Bar No. 16170) Edwards Angell Palmer & Dodge LLP 111 Huntington Avenue Boston, MA 02199 jgardner@eapdlaw.com</p> <p>Of Counsel:</p> <p>Mark Everiss Edwards Angell Palmer & Dodge UK LLP One Fetter Lane London, EC4A 1JB United Kingdom</p>
--	---

Certification

I, Joshua Gardner, hereby certify that on this 20th day of August, 2009, I caused to be served a copy of the foregoing via electronic mail to:

<p>Eric Smith Rackemann, Sawyer & Brewster P.C. 160 Federal Street Boston, MA 02110-1700 Tel: (617) 543-2300 esmith@rackemann.com</p>	<p>Lisa Snow Wade ORR & RENO, PA One Eagle Square P.O. Box 3550 Concord, NH 03302-3550 Tel: (603) 224-2381 lwade@orr-reno.com</p> <p>Kathleen E. Schaaf Morrison & Foerster LLP 1290 Avenue of the Americas New York, NY 10104 Tel: (212) 468-8000 kschaaf@mofocom</p>
---	---



Joshua Gardner