

IN RE:

**REQUEST FOR APPROVAL OF AGREEMENT
AND PLAN OF MERGER BETWEEN DANVILLE
MUTURAL FIRE INSURANCE COMPANY AND
NORTH YARMOUTH-CUMBERLAND MUTUAL
FIRE INSURANCE COMPANY**

**MOTION FOR ENLARGEMENT
OF TIME**

Docket No. INS-13-402

Now comes North Yarmouth-Cumberland Mutual, by and through Counsel, and also on behalf of Danville Mutual, and seeks an enlargement of time to respond to the Deputy Superintendent's Second Information Request. The Companies respectfully request until March 14, 2014, to respond to the information requests seeking documents or documentary evidence. The Companies hope to be able to respond to many of the questions by the time required but the documentary requests may take additional time for the reasons set forth below.

The Companies, and especially Danville, wish to inform the Deputy Superintendent that they are fully staffed by volunteers and have very limited resources. Every Officer and Director of the Companies is fully employed in other careers or is retired. Over the years, there have been no physical offices of the Companies other than the personal residence of an officer or the place of business of a volunteer officer. As a result, the attempt to gain documentary evidence is a challenge, especially in the case of the former senior officer of Danville that is over 90 years of age and in a care facility at this time. Counsel understands that some of the documentary history may be lacking or of a less formal nature than perhaps larger and financially robust insurers would possess and that a significant amount of information may reside in the memories of members. The additional time to respond would permit a more thorough search for documentary evidence to support the oral and slim documentary history of the relationships between these two companies.

Counsel will work diligently to provide the Deputy Superintendent responses as early as possible to the Second set of Requests. Allowing some additional time for the documentary responses would be beneficial to the Companies and should not interfere with a robust hearing which is to take place on March 21, 2014.

Wherefore, the Companies respectfully request a small enlargement of time to respond to the documentary requests of the Deputy Superintendent.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Cee C. Soltan", with a horizontal line extending to the right.

Charles C. Soltan
Counsel
North Yarmouth-Cumberland Mutual
Charles C. Soltan, LLC
P.O. Box 188
Augusta, ME 04332-0188

cc: William Stiles