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December 1, 2008

By Hand

Helen Foley-Bousquet
Clerk to the Hon. Ralph D. Gants
Suffolk County Courthouse
Three Pemberton Square
Boston, MA 02108

Re: *Marcia Rhodes, et al. v. AIG Domestic Claims, Inc., et al.,*
Suffolk Superior Court (Business Litigation Session) C.A. No. 05-1360

Dear Clerk Foley-Bousquet:


Enclosed please find the following documents:

1. **Emergency Motion of Defendants, AIG Domestic Claims, Inc. and National Union Fire Insurance Company Of Pittsburgh, Pa., For Leave Until December 5, 2008, to File Their Response to Plaintiffs' Emergency Motion For Post-Judgment Security;**

Given the pending emergency motion filed by the Plaintiffs, we will appreciate your forwarding this motion to Judge Gants' attention as soon as practicable. **This Motion has not been docketed yet.**

As always, should you have questions or concerns, please do not hesitate to contact me.

Very truly yours,



Robert Maselek

Enc.

cc: Margaret Pinkham, Esq.
M. Frederick Pritzker, Esq.
Daniel Brown, Esq.
Brown Rudnick Berlack Israels, LLP

Elizabeth C. Sackett, Esq.
Gregory Varga, Esq.
Robinson & Cole, LLP

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT DEPARTMENT

MARCIA RHODES, HAROLD RHODES,
and REBECCA RHODES,

Plaintiffs,

v.

AIG DOMESTIC CLAIMS, INC. f/k/a AIG
TECHNICAL SERVICES, INC., NATIONAL
UNION FIRE INSURANCE COMPANY OF
PITTSBURGH, PA., and ZURICH AMERICAN
INSURANCE COMPANY,

Defendants.

No.: 05-1360- BLS1 (Gants, J.)

**EMERGENCY MOTION OF DEFENDANTS, AIG DOMESTIC CLAIMS, INC. AND
NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA., FOR
LEAVE UNTIL DECEMBER 5, 2008, TO FILE THEIR RESPONSE TO PLAINTIFFS'
EMERGENCY MOTION FOR POST-JUDGMENT SECURITY**

1. On Friday, November 21, 2008, the Plaintiffs filed *Plaintiffs' Emergency Motion for Post-Judgment Security* with the court and with counsel by hand.

2. AIG Domestic Claims, Inc. ("AIGDC") and National Union Fire Insurance Company of Pittsburgh, Pa. ("National Union") (collectively, "AIGDC"), oppose *Plaintiffs' Emergency Motion for Post-Judgment Security*.

3. In order to adequately respond to the issues raised in the Plaintiffs' Motion, and given the intervening Thanksgiving holiday, AIGDC respectfully requests that the Court allow AIGDC until December 5, 2008, or whatever date the Court believes is reasonable, to submit its opposition to *Plaintiffs' Emergency Motion for Post-Judgment Security*.

Respectfully Submitted,

AIG DOMESTIC CLAIMS, INC. and
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,

By their attorneys,



Anthony R. Zelle, BBO# 548141
Mark E. Cohen, BBO #089800
Brian P. McDonough, BBO# 637999
Robert J. Maselek, BBO #564690
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Dated: December 1, 2008

CERTIFICATE OF SERVICE

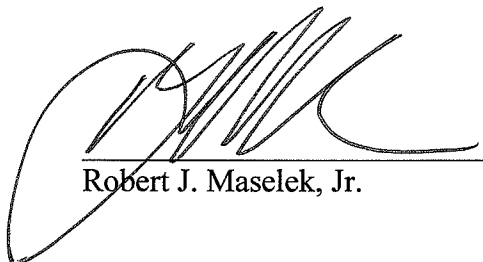
I, Robert J. Maselek, Jr., certify that on this 1st day of December, 2008, I caused a copy of the foregoing to be served, by electronic and regular mail, upon the following:

M. Frederick Pritzker, Esq.
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Robert J. Maselek, Jr.