

Motion for Entry of an Order (A) Authorizing the Debtors to Continue to Administer Insurance Coverage Currently in Effect and (B) Authorizing Financial Institutions to Honor All Related Checks and Electronic Payment Requests (the "Insurance Motion").

By the Insurance Motion, the Debtors seek entry of an order authorizing, but not directing, the Debtors to pay prepetition insurance premiums, if any, necessary to maintain insurance coverage currently in effect and revise, extend, supplement, or change such coverage as needed, including the renewal of existing policies or entry into new policies. The Debtors have prepaid their premiums for 2008 (except for the warranty insurance for their home warranty program which the Debtors continue to pay on a current basis under the interim authorization of the Bankruptcy Court's order approving the Home Sale Motion, previously summarized and circulated to the Committee) and do not believe that they owe any prepetition amounts under their insurance policies. Out of an abundance of caution, however, the Debtors seek the relief requested in the Insurance Motion.

The Debtors maintain numerous insurance policies including general liability, property, media liability, automotive, workers' compensation liability, kidnap and ransom, commercial crime, commercial umbrella and excess liability, legal liability, mortgage bankers liability and directors and officers' liability (collectively, the "Policies"). For 2007, the total annual premium on the Policies was approximately \$11.4 million. The Debtors believe that these Policies are essential to the preservation of the Debtors' businesses, property, and assets and that such insurance coverage is required, in many cases, by various regulations, laws, and contracts that govern the Debtors' commercial activities. Moreover, the United States Trustee's Operating Guidelines and Reporting Requirements require debtors to maintain insurance coverage throughout their chapter 11 proceedings.

Additionally, the Debtors request that all applicable banks and other financial institutions be authorized to receive, process, and pay all checks presented for payment, and to honor all electronic payment requests made by the Debtors related to the obligations described above, whether those obligations arose before or after the filing of the chapter 11 cases. The Debtors maintain that they expect to have sufficient cash reserves to pay any amounts outstanding on the Policies promptly. In light of the foregoing, the Debtors assert that the relief requested is justified.

An order approving the Insurance Motion was entered on March 6, 2008.