

CAUSE NO. D-1-GV-08-000945

<p>THE STATE OF TEXAS Plaintiff,</p> <p>v.</p> <p>MEMORIAL SERVICE LIFE INSURANCE COMOPANY, LINCOLN MEMORIAL LIFE INSURANCE COMPANY, AND NATIONAL PREARRANGED SERVICES, INC. Defendants.</p>	§ § § § § § § § § §	<p style="text-align: right;">IN THE DISTRICT COURT OF</p> <p style="text-align: right;">TRAVIS COUNTY, TEXAS</p> <p style="text-align: right;">250TH JUDICIAL DISTRICT</p>
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**SPECIAL DEPUTY RECEIVER'S AND NOLHGA'S OBJECTIONS TO
NORTHSTAR REINSURANCE IRELAND, LTD.'S EXHIBITS**

Donna Garrett, Special Deputy Receiver of Memorial Service Life Insurance Company, Lincoln Memorial Life Insurance Company and National Prearranged Services, Inc. (the "SDR" and "Lincoln-Memorial-NPS" respectively) and the National Organization of Life and Health Insurance Guaranty Associations ("NOLHGA") (on behalf of the guaranty associations affected by this insolvency, including the Texas Life, Accident, Health, and Hospital Service Insurance Guaranty Association), file these Objections to Northstar's Exhibit List. The SDR and NOLHGA reserved the right to file additional objections and amendments and supplements thereto up to and after the final hearing on Northstar's Motion to Lift Stay.

<u>Exhibit No.</u>	<u>Description</u>	<u>Sustained</u>	<u>Modified</u>
1	Affidavit of John H. Tweedie Objection: Hearsay; Makes legal conclusions from an unqualified witness; assumes facts not in evidence; Best Evidence Rule: Violates TRE 1006; Lacks personal knowledge in violation of TRE 602 and 703; Irrelevant under TRE 401	_____	_____

2 Transcript of Agreement of the Parties – Garrett Deposition Exhibit 12

Objection: Irrelevant under TRE 401; assumes facts not in evidence; Hearsay; TEX. INS. CODE ANN. 443.008(C)(2); TEX. INS. CODE ANN. 443.011(C);

3 Deposition Transcript of Donna Garrett taken 01/12/09

Objection: The SDR and NOLHGA assert all objections asserted in the deposition, which are incorporated by reference.

4 Liquidation Plan – Garrett Deposition Exhibit 14

Objection: Incomplete document-optional completeness

5 Northstar’s Motion for Summary Judgment

Objection: Incomplete document-optional completeness; Hearsay; assumes facts not in evidence; Best Evidence Rule; Violates TRE 1006; Irrelevant under TRE 401

Respectfully submitted,

By: /s/Christopher Fuller

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CERTIFICATE OF SERVICE

I certify that on January 20, 2009, a true and correct copy of SDR'S AND NOLHGA'S OBJECTIONS TO NORTHSTAR'S EXHIBITS were served pursuant to the Order of Liquidation, Order Approving Liquidation Plan and Permanent Injunction, the Amended Order of Reference, the Texas Rules of Civil Procedure and TEX. INS. CODE ANN. SEC. 443 on the following by electronic mail, except as specifically noted

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