

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

2004 APR - 4 P 3 19
Docket No. 03-E-0106

**In the Matter of the Liquidation of
The Home Insurance Company**

AFFIDAVIT OF MICHAEL AVERILL

I, Michael Averill, hereby depose and say:

1. I am a consultant to the Liquidator of The Home Insurance Company ("Home"). Since the liquidation of Home began, I established the operations of Home in Manchester, New Hampshire. My responsibilities include oversight of the mailing of notices concerning the liquidation and proof of claim forms. The facts and information set forth below are either within my own knowledge, in which case I confirm that they are true, or are based on information provided to me by others, in which case they are true to the best of my knowledge, information and belief.

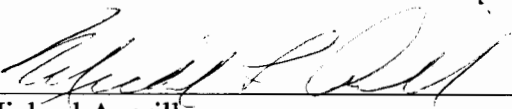
2. In June and early July 2003, the Liquidator mailed approximately 330,000 notices of the liquidation (including a proof of claim) to potential claimants, including policyholders and reinsureds that could be reasonably identified. That mailing is described in the Liquidator's First Report. The Liquidator also published notice of the liquidation. That publication is described in the Liquidator's First Report.

3. The mailing in June and early July 2003 involved external costs of \$164,282.63 (\$100,731.67 for postage, \$26,281.64 for mailing house costs, and \$37,269.32 for printing). Copies of the invoices from New Hampshire Mailing Services, Inc. dated July 7, 2003 and from Printers Square, Inc. dated June 24, 2003 reflecting these costs are attached as Exhibits A and B.

4. The June 2003 publication notice cost \$111,847.13. A copy of the invoice from Miller Advertising Agency dated July 16, 2003 reflecting this cost is attached as Exhibit C.

5. The Liquidator has mailed additional notices and proof of claim forms since the initial mailing. Including the first mailing, the Liquidator has mailed over 347,000 notices and proof of claim forms to potential creditors since the liquidation began. Of these, over 121,000 have been returned as undeliverable.

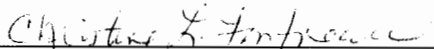
Signed under the penalties of perjury this _____ day of April, 2004.



Michael Averill

STATE OF NEW HAMPSHIRE
COUNTY OF HILLSBOROUGH

Subscribed and sworn to, before me, this 1st day of April, 2004



Notary Public/Justice of the Peace

CHRISTINE L. FONTNEAU, Notary Public
My Commission Expires August 9, 2005

