

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

Docket No. 03-E-0106

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

**LIQUIDATOR'S NOTICE OF SUBMISSION OF DOCUMENTS  
FOR IN CAMERA REVIEW**

Pursuant to the Court's Order dated May 12, 2005, Roger A. Sevigny, Commissioner of Insurance for the State of New Hampshire, as Liquidator ("Liquidator") of The Home Insurance Company ("Home"), hereby submits to the Court: (i) the Legend identifying persons appearing on the Liquidator's privilege logs; (ii) three privilege logs, one each for Appendix 2, 3 and 5 to the ACE Companies' Motion to Compel Production of Documents by the Liquidator, dated March 22, 2005 (the "Motion"), that include entries reflecting the information provided to the ACE Companies on the Liquidator's privilege logs and letters to counsel; and (iii) the documents identified on Appendices 2, 3 and 5. Copies of items (i) and (ii) are being served on the service list, while item (iii) is being submitted under seal for in camera review.

In connection with the Court's review, the Liquidator notes that

- Many documents consist of strings of emails. For ease of reference, the ACE Companies and the Liquidator adopted and have consistently followed a convention in which each email in a string has been given a parenthesized number that represents that item's place in sequence. See Motion at 3 n.3. For example, document 19 consists of two attached emails: one email dated December 10, 2003, which is identified as 19(1), and a second email dated December 9, 2003, which is identified as 19(2). To aid the Court's review, handwritten markings appear on each privilege log to clearly identify the sub-numbers assigned to each email;
- Labels with numbers (e.g., "13(1)") have been placed on the documents to indicate the privilege log entry under review;

- Hand-written markings (lines and arrows or document numbers) have been added to clearly separate the item on the Appendix under review from other items on the document that are not under review;
- Where a document has been produced to the ACE Companies and BMC in redacted form, (i) a notation reflecting the bates number of the document as produced appears at the top of the document, (ii) the portions of the text that were redacted from the document as produced are identified for the Court's reference by a "Redacted" stamp in the margin and handwritten brackets, and (iii) privilege log entries for each document include a notation in the "Reason for Withholding" column indicating that the document was produced in redacted form (e.g., "Produced in Redacted Form at H02565");
- In a few instances, a separate document attached to an email was withheld from production. Such attachments (e.g., a draft letter or agreement) are submitted with a "Redacted" stamp at the top;
- Where the Liquidator has provided additional explanation of the basis of withholding a document in a letter responding to ACE questions (specifically, the letters to the ACE Companies dated February 14, 2005 and March 11, 2005, see Motion, Exs. 6, 8), a notation appears in the "Reason for Withholding" column (e.g., "Document reflects legal advice") to reflect that explanation;
- The basis of withholding documents in Appendix 5 is explained in detail in the Liquidator's Opposition to ACE Companies' Motion to Compel at ¶ 33;
- One red page is inserted for each Appendix to separate documents addressed on the Liquidator's Privilege Log dated December 21, 2004 from those addressed on the Liquidator's Privilege Log dated January 5, 2004;
- Privilege log entries for documents identified in Appendices 2, 3 and 5, and thus subject to the Court's review, are shown in bold text on each privilege log. In some instances, the Appendices list only one of a string of emails. Privilege log entries for other emails in the string, if any, are shown in normal typeface. As an example, the entry for item 92(1), which is not identified in Appendix 2 and therefore is not subject to the Court's review, appears in normal text while the entry for item 92(2) appears in bold text because it is identified in Appendix 2 and therefore is subject to the Court's review; and
- Three documents identified in Appendix 5, documents 22(3), 25(3) and 25(4), are not being submitted because the Liquidator produced them to the ACE Companies and BMC on April 1, 2005. See Liquidator's Opposition to ACE Companies' Motion to Compel, p. 18 n.11.

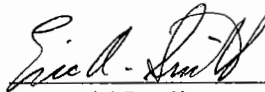
Respectfully submitted,

ROGER A. SEVIGNY, INSURANCE  
COMMISSIONER OF THE STATE OF NEW  
HAMPSHIRE, AS LIQUIDATOR OF THE HOME  
INSURANCE COMPANY

By his attorneys,

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Boston, MA 02111  
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May 13, 2005

Certificate of Service

I hereby certify that a copy of the foregoing Liquidator's Notice of Submission of Documents for In Camera Review (with the Legend and privilege logs for Appendices 2, 3, and 5) was sent, this 13th day of May, 2005, by first class mail, postage prepaid to all persons on the attached service list.



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Eric A. Smith

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

In the Matter of the Liquidation of  
The Home Insurance Company  
Docket No. 03-E-0106

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**Liquidator's Log of Documents Withheld from Production in Accordance with (i) the  
Liquidator's Response to the ACE Companies' Document Request and (ii) the Liquidator's  
Response to Benjamin Moore & Co.'s Document Request**

**December 21, 2004 (Updated February 14, 2005)**

**Legend**

AA	Angela Anglum, Vice President Legal Affairs, The Home Insurance Company (in Liquidation) ("Home")
AF	Alexander Feldvebel, N.H. Deputy Commissioner of Insurance
BC	Benjamin Cairns, Ernst & Young (UK), Joint Provisional Liquidators
CC	Clifford Chance, counsel to Joint Provisional Liquidators
DL	J. David Leslie, Rackemann, Sawyer & Brewster, counsel to Liquidator
DS	David Steinberg, Clifford Chance, counsel to Joint Provisional Liquidators
ES	Eric A. Smith, Rackemann, Sawyer & Brewster, counsel to Liquidator
E&Y	Ernst & Young (UK), firm of Joint Provisional Liquidators
GH	Gareth Hughes, Ernst & Young (UK), Joint Provisional Liquidator
JB	Jeanette Best, Clifford Chance, counsel to Joint Provisional Liquidators
JC	John Curran, Clifford Chance, counsel to Joint Provisional Liquidators
JJ	Jackie Johnson, paralegal, NH Attorney General's Office
JR	Jonathan Rosen, Chief Operating Officer, Home
KM	Karl Moller, Chief Actuary, Home
KS	Kirsty Smith, secretary, Clifford Chance
MH	Matthew Harrison, Ernst & Young (UK), Joint Provisional Liquidators
PB	Peter A. Bengelsdorf, Special Deputy Liquidator
PH	Phillip Hertz, Clifford Chance, counsel to Joint Provisional Liquidators
PR	Peter Roth, Senior Assistant Attorney General, NH Attorney General's Office, counsel to Liquidator
RS&B	Rackemann, Sawyer & Brewster, counsel to Liquidator
RS	Roger A. Sevigny, N.H. Commissioner of Insurance, Liquidator
SE	Sarah Ellis, Ernst & Young (UK), Joint Provisional Liquidators
SD	Sally Denchfield, secretary, Clifford Chance

The Superior Court for Merrimack County, New Hampshire, appointed the Commissioner of Insurance for the State of New Hampshire as Liquidator of Home.

The High Court of Justice in London appointed Gareth Hughes and Margaret Mills, partners of Ernst & Young (UK), as joint provisional liquidators in a provisional liquidation proceeding for Home's UK Branch.

The liquidation of Home, through the New Hampshire and UK proceedings, comprises a matter of common interest between the Liquidator and the Joint Provisional Liquidators.

**APPENDIX 2 PRIVILEGE LOG**

Docket No. 03-E-0106

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

First Produced on 12/21/04

**Liquidator's Log of Documents Withheld from Production in Accordance with (i) the Liquidator's Response to the ACE Companies' Document Request and (ii) the Liquidator's Response to Benjamin Moore & Co.'s Document Request**

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
13. (1)	12/18/03	E-mail	ACE's View of OSLR reserves	RS	PB	AF	attorney-client privilege <b>PRODUCED IN REDACTED FORM AT H02543</b>
13 (2)	12/18/03	E-mail attached	AFIA Figures	PH	MH	DS GH DL BC JR PB PR SE	attorney-client privilege
19. (1)	12/10/03	E-mail	RW's View of Actuarial Model	PB	SE	DS GH JR PH MH	attorney-client privilege
19 (2)	12/9/03	E-mail attached	RW's View of Actuarial Model	SE	PB	DS GH PH	attorney-client privilege
20.		E-mail draft ultimately shared with counsel	Draft of email re: RW's view of Actuarial Model	SE	PB	DS GH PH	attorney-client privilege
68. (1)	9/25/03	E-mail	Conversation with M. Durkin	JR	SE	BC GH MH PH DS KM PB	attorney-client privilege
68(2)	9/25/03	E-mail attached	Conversation with M. Durkin	SE	JR	BC GH PH KM DS MH PB	attorney-client privilege
68 (3)	9/25/03	E-mail attached	Conversation with M. Durkin	JR GH PH DS	SE	MH BC	attorney-client privilege
92. (1)		E-mail draft ultimately	Update on UK matters	AF	PB	RS PR	attorney-client privilege

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
		shared with counsel				DL ES	
92 (2)	1/6/04	E-mail attached	OSLR Figures	GH	MH	SE JR PH PB DS BC	attorney-client privilege
127. (1)	12/18/03	E-mail	AFIA Figures	MH	GH	BC DL PB PR DS JR PH SE	attorney-client privilege
127 (2)	12/18/03	E-mail attached	AFIA Figures	PH	MH	DS JR SE GH PB BC	attorney-client privilege
132. (1)	12/10/03	E-mail	RW's View of Actuarial Model	PB	SE	DS JR MH GH PH	attorney-client privilege
132 (2)	12/9/03	E-mail attached	RW's View of Actuarial Model	SE JR	PB	DS GH PH	attorney-client privilege
133.	12/9/03	E-mail	RW's View of Actuarial Model	SE JR	PB	DS PH GH	attorney-client privilege
146.	12/18/03	E-mail with attached spreadsheet of OSLR reserves	AFIA figures	PH	MH	DS DL PB SE GH JR PR BC	attorney-client privilege
176. (1)	9/25/03	E-mail	Conversation with M. Durkin	SE	JR	BC GH PH KM DS MH PB	attorney-client privilege
176 (2)	9/25/03	E-mail attached	Conversation with M. Durkin	PH DS JR GH	SE	MH BC	attorney-client privilege
197.	1/13/04	E-mail with spreadsheets attached	Equitas model estimating net return to cedents	JR	SE	GH DS	attorney-client privilege



<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
202.	1/6/04	E-mail with spreadsheet attached	Agrippina figures and OSLR	GH	MH	SE PB JR DS	attorney-client privilege
207. (1)	12/18/03	E-mail	AFIA figures	MH	GH	BC DS PB DL JR	attorney-client privilege
207 (2)	12/18/03	E-mail attached with spreadsheet of OSLR reserves attached	AFIA figures	PH	MH	DS DL PB SE GH JR PR BC	attorney-client privilege
221. (1)	12/10/03	E-mail	RW's View of Actuarial Model	PB	SE	DS JR GH PH	attorney-client privilege
221 (2)	12/9/03	E-mail attached	RW's View of Actuarial Model	SE JR	PB	DS PH	attorney-client privilege
222.	12/9/03	E-mail	RW's View of Actuarial Model	SE JR	PB	DS PH	attorney-client privilege
233.	11/11/03	E-mail	Discussions with Rhydian Williams; JR & PB	DS SE	GH		attorney-client privilege
244.	9/25/03	E-mail	Conversation with M. Durkin	JR GH PH	SE	MH BC	attorney-client privilege
264. (1)	9/25/03	E-mail	Conversation with M. Durkin	JR	SE	BC GH MH DS KM PB	attorney-client privilege
264 (2)	9/25/03	E-mail attached	Conversation with M. Durkin	SE	JR	BC GH PH MH DS KM PB	attorney-client privilege
264 (3)	9/25/03	E-mail attached	Conversation with M. Durkin	JR GH PH DS	SE	MH BC	attorney-client privilege
306. (1)	12/9/03	E-mail	RW's View of Actuarial Model	RS	PB	AF PR DL	attorney-client privilege
306 (2)	12/9/03	E-mail attached	RW's View of Actuarial Model	SE JR	PB	DS PH GH	attorney-client privilege

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
342. (1)	9/25/03	E-mail	Conversation with M. Durkin	RS	PB	DL AF PR	attorney-client privilege
342(2)	9/25/03	E-mail attached	Conversation with M. Durkin	SE	JR	BC GH PH KM DS MH PB	attorney-client privilege
342(3)	9/25/03	E-mail attached	Conversation with M. Durkin	JR DS PH	SE	MH BC	attorney-client privilege

**Liquidator's Log of Documents Withheld from Production in Accordance with (i) the Liquidator's Response to the ACE Companies' Document Request and (ii) the Liquidator's Response to Benjamin Moore & Co.'s Document Request**

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
1. (1)	9/25/03	E-mail	Conversation w/M. Durkin	SE	JR	BC GH PH KM DS MH PB	attorney-client privilege
(2)	9/25/03	E-mail attached	Conversation w/M. Durkin	JR PH GH DS	SE	MH BC	attorney-client privilege
2.(1)	9/25/03	E-mail	Conversation w/M. Durkin	JR	SE	BC GH PH KM DS MH PB	attorney-client privilege
2(2)	9/25/03	E-mail attached	Conversation w/M. Durkin	SE	JR	BC GH PH KM DS MH PB	attorney-client privilege
2(3)	9/25/03	E-mail attached	Conversation w/M. Durkin	JR PH GH DS	SE	BC MH	attorney-client privilege
8. (1)	12/09/03	E-mail	RW's View of Actuarial Model	DL KM ES	PB		attorney-client privilege
8(2)	12/9/03	E-mail attached	RW's View of Actuarial Model	JR SE	PB	PH DS GH	attorney-client privilege
46.	1/13/04	E-mail with draft spreadsheets attached	Equitas Model estimating net return to Cedents	JR	SE	GH DS	attorney-client privilege

**APPENDIX 3 PRIVILEGE LOG**

Docket No. 03-E-0106

In the Matter of the Liquidation of  
The Home Insurance Company

First Produced on 12/21/04

**Liquidator's Log of Documents Withheld from Production in Accordance with (i) the Liquidator's Response to the ACE Companies' Document Request and (ii) the Liquidator's Response to Benjamin Moore & Co.'s Document Request**

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
22.(1)	12/4/03	E-mail	Attached emails re: Agrippina	SE	GH	DS JR DL PB	attorney-client privilege <b>PRODUCED IN REDACTED FORM AT H02762</b>
22(2)	12/3/03	E-mail attached	Discussion with Agrippina	JR	SE	GH DL PB DS	attorney-client privilege
22(3)	12/3/03	E-mail attached	Call with Agrippina tomorrow	SE	JR		attorney-client privilege
23(1)	12/4/03	E-mail	Gernot	RS	PB	AF PR DL	attorney-client privilege <b>PRODUCED IN REDACTED FORM AT H02545</b>
23(2)	12/3/03	E-mail attached	Gernot	JR	SE	GH DL PB DS	attorney-client privilege
23(3)	12/3/03	E-mail attached	Gernot	SE	JR		attorney-client privilege
24.(1)	12/3/03	E-mail	Gernot	JR	SE	GH DL PB DS	attorney-client privilege <b>PRODUCED IN REDACTED FORM AT H02548</b>
24(2)	12/3/03	E-mail attached	Gernot	SE	JR		attorney-client privilege
25(1)	11/26/03	E-mail	Cedants' Letter	SE	JR	DS MH DL GH PB ES	attorney-client privilege
25(2)	11/26/03	E-mail attached	Cedants' Letter	PB JR	SE	DS GH MH	attorney-client privilege
27.	11/26/03	E-mail	Cedants' Letter	PB JR	SE	DS GH MH	attorney-client privilege
38(1)	10/31/03	E-mail	Proposed Commercial Resolution (forwarded by JR)	PH SE	BC	GH JR	attorney-client privilege
38(2)	10/31/03	E-mail	Proposed Commercial	DL	GH	AF	attorney-client privilege

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
38(3)		attached	Resolution			PB RS MH DS PR SE JR PH BC	
38(4)	10/30/03	E-mail attached	Proposed Commercial Resolution	RS PB SE AF JR DS PR GH PH	DL		attorney-client privilege
39(1)	10/28/03	E-mail	Letter of Undertaking re: Information provided to Home by AFIA Cedants	PH PB JR JC	SE	GH MH	attorney-client privilege PRODUCED IN REDACTED FORM AT H02551
39(2)	10/25/03	E-mail attached	Letter of Undertaking re: Information provided to Home by AFIA Cedants	SE	GH	BC MH	attorney-client privilege
39(3)	10/23/03	E-mail attached	Letter of Undertaking re: Information provided to Home by AFIA Cedants	PB GH PR BC JR SE DL MH	DS	PH JC	attorney-client privilege
40(1)	10/22/03	E-mail	Points with Creditors	MH JR PB	PH	PH DS SE DL JC BC PR GH	attorney-client privilege
40(2)	10/22/03	E-mail attached	Points with Creditors	PB JR	MH	DL PH SE PR JC BC DS GH	attorney-client privilege
43.	10/8/03	Draft Slides	Slides for ICC Meeting of 10/21/03 (attachment to 340(2))		E&Y (CC in part)		attorney-client privilege Draft reflecting legal advice
59.	10/14/03	Fax Cover	Slide Presentation for	MH	AA	PB	attorney-client

Item #	Date	Document	Subject Matter	To	From	CC	Reason for Withholding
		Sheet	10/21/03 ICC Meeting				privilege
60.	10/14/03	Fax/Draft slides	Fax cover sheet and attached slide presentation for 10/21/03 ICC Meeting	PB	PR/ E&Y (CC in part)	JR	attorney-client privilege
62.(1)	10/22/03	E-mail	Attached email	PH	GH	BC DS DL JC PH JR MH PB PR SE	attorney-client privilege
62(2)	10/22/03	E-mail attached	Confidentiality undertakings for Agrippina	MH	PH	PB DL DS JC BC JR PR PH SE	attorney-client privilege
62(3)	10/22/03	E-mail attached	Meeting with Nationwide	PB JR	MH	DL PH SE PR JC BC DS GH	attorney-client privilege
63.	10/22/03	E-mail	Meeting with Nationwide	PB JR	MH	DL PH SE PR JC BC DS GH	attorney-client privilege
64.(1)	10/22/03	E-mail	Points with Creditors	MH PB JR	PH	DL DS JC SE PR PH GH BC	attorney-client privilege
64(2)	10/22/03	E-mail attached	Points with Creditors	PB	MH	DL DS JC SE PR PH GH BC	attorney-client privilege

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
71.(1)	9/24/03	E-mail	Letter to Lovells	DS	ES	BR BC GH JC PH SE PB JR RS AF DL PR	attorney-client privilege work product
71(2)	9/22/03	E-mail attached	Letter to Lovells	DS	DL	BR BC GH JC PH SE PB JR RS AF ES	attorney-client privilege work product
71(3)	9/22/03	E-mail attached	Letter to Lovells	JR	DS	BR BC GH JC PH SE PB DL	attorney-client privilege work product
71(4)	9/22/03	E-mail attached	Letter to Lovells	DS	JR	BR BC GH JC PH SE PB DL	attorney-client privilege work product
71(5)	9/22/03	E-mail attached	Letter to Lovells	JR SE BC	DS	PH JC BR	attorney-client privilege work product
71(6)	9/22/03	E-mail attached	Letter to Lovells	SD	DS		attorney-client privilege work product
72.	9/24/03	E-mail	Draft Agenda	DL	SE	AF DS ES GH JR PB PH RS BC MH	attorney-client privilege
76.(1)	9/22/03	E-mail	Letter to Lovells	DS	JR	BR BC	attorney-client privilege work product

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
						GH JC PH SE PB DL	
76(2)	9/22/03	E-mail attached	Letter to Lovells	JR SE GH	DS	PH JC BR	attorney-client privilege work product
76(3)	9/22/03	E-mail attached	Letter to Lovells	SD	DS		attorney-client privilege work product
96: (1)	2/1/04	E-mail	Unionamerica Draft Proposal Letter	PB	GH	BC DL MH PH DS JR PR SE	attorney-client privilege
96(2)	2/1/04	E-mail attached	Unionamerica Draft Proposal Letter	SE GH JR	PB	PH MH DS DL BC PR	attorney-client privilege
120.(1)	1/2/04	E-mail	Unionamerica Draft Proposal Letter	PB	GH	BC DL MH DS JR PR PH SE	attorney-client privilege
120(2)	1/2/04	E-mail attached	Unionamerica Draft Proposal Letter	SE JR GH	PB	PH BC PR DL DS	attorney-client privilege
134.(1)	12/4/03	E-mail	Gernot	SE	GH	DS JR DL PB	attorney-client privilege PRODUCED IN REDACTED FORM AT H02554
134(2)	12/3/03	E-mail attached	Gernot	JR	SE	GH PB DL DS	attorney-client privilege
134(3)	12/3/03	E-mail attached	Gernot	SE	JR		attorney-client privilege
135. (1)	12/3/03	E-mail	Gernot	JR	SE	GH PB DL DS	attorney-client privilege PRODUCED IN REDACTED FORM AT H02556
135(2)	12/3/03	E-mail attached	Gernot	SE	JR		attorney-client privilege



<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
138.(1)	11/26/03	E-mail	Cedants' Letter	SE	JR	DS MH DL GH PB ES	attorney-client privilege
138(2)	11/26/03	E-mail attached	Cedants' Letter	PB JR	SE	DS MH GH	attorney-client privilege
139.	11/26/03	E-mail	Cedants' Letter	PB JR	SE	DS MH GH	attorney-client privilege
142.(1)	11/26/03	E-mail	Cedants' Letter	SE	JR	DS MH DL GH PB ES	attorney-client privilege
142(2)	11/26/03	E-mail attached	Cedants' Letter	PB JR	SE	DS MH GH	attorney-client privilege
154.	11/26/03	Email with attached draft slides	AFIA Cedent Participations	JR	MH	DS DL PB GH KM PR PH RS SE	attorney-client privilege
164.(1)	10/28/03	E-mail	Letter of Undertaking regarding information provided to Home by AFIA Cedants	PH PB JR JC	SE	GH MH	attorney-client privilege PRODUCED IN REDACTED FORM AT H02558
164(2)	10/28/03	E-mail attached	Letter of Undertaking regarding information provided to Home by AFIA Cedants	SE	GH	BC MH	attorney-client privilege
164(3)	10/25/03	E-mail attached with draft letter to AFIA Cedents attached	Letter of Undertaking regarding information provided to Home by AFIA Cedants	PB GH DL BC JR SE PR MH	DS	PH CJ	attorney-client privilege
166.(1)	10/28/03	E-mail	Letter of Undertaking regarding Information Provided to Home by AFIA Cedents	SE	PH	GH MH JR PB JC DS	attorney-client privilege PRODUCED IN REDACTED FORM AT H02561
166(2)	10/28/03	E-mail attached	Letter of Undertaking regarding Information	PH JR	SE	GH MH	attorney-client privilege

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
			<b>Provided to Home by AFIA Cedents</b>	<b>PB JC</b>			
166(3)	10/28/03	E-mail attached	Letter of Undertaking regarding Information Provided to Home by AFIA Cedents	SE	GH	BC MH	attorney-client privilege
166(4)	10/25/03	E-mail attached with attached draft letter	Letter of Undertaking regarding Information Provided to Home by AFIA Cedents	GH PB JR SE DL PR BC MH	DS	PH JC	attorney-client privilege
169.	10/2/03	E-mail with attachments	Cut throughs and the NEMGIA case	GH SE BC MH JR	DS	DL PH JC	attorney-client privilege work product
177. (1)	11/26/03	E-mail	Cedants' Letter	KM	JR		attorney-client privilege
177(2)	11/26/03	E-mail attached	Cedants' Letter	PB KM	JR	DL	attorney-client privilege
177(3)	11/26/03	E-mail attached	Cedants' Letter	PB JR	SE	DS GH MH	attorney-client privilege
178. (1)	11/26/03	E-mail	Cedants' Letter	PB KM	JR	DL	attorney-client privilege
178(2)	11/26/03	E-mail attached	Cedants' Letter	PB JR	SE	DS GH MH	attorney-client privilege
179. (1)	11/26/03	E-mail	Cedants' Letter	JR	KM		attorney-client privilege
179(2)	11/26/03	E-mail attached	Cedants' Letter	KM	JR		attorney-client privilege
179(3)	11/26/03	E-mail attached	Cedants' Letter	PB KM	JR	DL	attorney-client privilege
179(4)	11/26/03	E-mail attached	Cedants' Letter	PB JR	SE	DS GH MH	attorney-client privilege
182. (1)	10/22/03	E-mail	Points to be discussed with Creditors (forwarded by PB & AA)	MH JR	PH	DL DS JC SE PR PH GH BC	attorney-client privilege
182(2)	10/22/03	E-mail attached	Points to be discussed with Creditors	PB JR	MH	PR DS JC SE DL PH GH	attorney-client privilege

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
						BC	
187. (1)	1/26/04	E-mail	Scheme for AFIA Cedants	AF JR RS AA PB	PR		attorney-client privilege
187(2)	1/26/04	E-mail attached	Scheme for AFIA Cedants	JR SE PR PB GH	DS	PH	attorney-client privilege
187(3)	10/8/03	Draft Slides	Slides for ICC Meeting 10/21/03 (attachment to 340(2))		E&Y (CC in part)		attorney-client privilege Draft reflecting legal advice
189. (1)	2/11/04	E-mail	ICC Meeting	SE	JR	BC DS GH PR RS DL MH PB PH	attorney-client privilege
189(2)	2/11/04	E-mail attached	ICC Meeting	PH DL JR DS GH PB PR RS	SE	BC MH	attorney-client privilege
192. (1)	1/23/04	E-mail	ICC package/ Unionamerica	PH	SE	DS GH JR ES DL PB	attorney-client privilege
192(2)	1/22/04	E-mail attached	ICC package	GH	PH	JR PR ES PB DL DS	attorney-client privilege
195. (1)	1/14/04	E-mail	E&Y Letter to AFIA Cedants	DS	SE	GH	attorney-client privilege
195(2)	1/14/04	E-mail attached	E&Y Letter to AFIA Cedants	JR DL BC DS GH MH PB PR SE PH	DS		attorney-client privilege

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
195(3)	1/14/04	E-mail attached	E&Y Letter to AFIA Cedents	DL BC DS GH MH PB PR SE	JR		attorney-client privilege
195(4)	1/14/04	E-mail attached	E&Y Letter to AFIA Cedents	DS BC DL GH JR MH PB PR SE	DL		attorney-client privilege
195(5)	1/14/04	E-mail attached	E&Y Letter to AFIA Cedents	BC FL GH JR MH PB PR SE	DS		attorney-client privilege
195(6)	1/14/04	E-mail attached	E&Y Letter to AFIA Cedents	DS	KS		attorney-client privilege
201.	1/6/04	E-mail	Unionamerica Meeting/JR Visit	PH DS GH	SE	MH BC	attorney-client privilege
203. (1)	12/30/03	E-mail	Unionamerica	PH PB DS DL JR	SE	GH BC MH	attorney-client privilege
203(2)	12/30/03	E-mail attached	Unionamerica	GH	SE		attorney-client privilege
206. (1)	1/2/04	E-mail	Unionamerica Draft Proposal Letter	PB	GH	BC DL MH DS JR PR	attorney-client privilege
206(2)	1/2/04	E-mail attached	Unionamerica Draft Proposal Letter	SE GH JR	PB	PH MH DS DL BC PR	attorney-client privilege
218.	12/14/03	E-mail	Issues for conference call; recent correspondence	SE MH PH	GH		attorney-client privilege
223. (1)	12/4/03	E-mail	Gernot	SE	GH	DS JR DL PB	attorney-client privilege PRODUCED IN REDACTED FORM

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
							AT H02565
223(2)	12/3/03	E-mail attached	Gernot	JR	SE	GH PB DL DS	attorney-client privilege
223(3)	12/3/03	E-mail attached	Gernot	SE	JR		attorney-client privilege
224. (1)	12/3/03	E-mail	Gernot	JR	SE	GH PB DL DS	attorney-client privilege PRODUCED IN REDACTED FORM AT H02567
224(2)	12/3/03	E-mail attached	Gernot	SE	JR		attorney-client privilege
225. (1)	12/3/03	E-mail	AFIA Alternative Participations	GH	SE		attorney-client privilege PRODUCED IN REDACTED FORM AT H02569
225(2)	12/3/03	E-mail attached	AFIA Alternative Participations	SE	GH		attorney-client privilege
225(3)	12/1/03	E-mail attached	AFIA Alternative Participations	GH SE	JR	DL ES DS	attorney-client privilege
226. (1)	11/26/03	E-mail	AFIA Cedent Participations	BC GH MH PR DL JR PB SE	DS		attorney-client privilege
226(2)	11/26/03	E-mail attached	AFIA Cedent Participations	MH	DS		attorney-client privilege
226(3)	11/26/03	E-mail attached	AFIA Cedent Participations	JR	MH	DS DL PB PH SE GH KM PR RS	attorney-client privilege
228. (1)	11/26/03	E-mail	Cedants' Letter	SE	JR	DS PB GH DL MH ES	attorney-client privilege
228(2)	11/26/03	E-mail attached	Cedants' Letter	PB JR	SE	DS MH GH	attorney-client privilege

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
229.	11/26/03	E-mail	Cendants' Letter	PB JR	SE	DS GH MH	attorney-client privilege
236.	11/13/03	E-mail with attached letter to ICC	Covering letter to ICC	GH MH	SE	PH	attorney-client privilege
237. (1)	11/12/03	E-mail	Response to UK ICC Questions	DS	SE	GH PH	attorney-client privilege
237(2)	11/10/03	E-mail attached	Response to UK ICC Questions	RS PR JR SE PH AF PB GH DS	DL		attorney-client privilege
238. (1)	12/9/03	E-mail	Nationwide Confidentiality Agreement	JR	SE	DS MH PH GH PB	attorney-client privilege
238(2)	12/8/03	E-mail attached	Nationwide Confidentiality Agreement	MH	JR	DS PB SE GH PH	attorney-client privilege
238(3)	12/8/03	E-mail attached	Nationwide Confidentiality Agreement	GH	MH	DS PB JR SE PH	attorney-client privilege
239. (1)	12/9/03	E-mail	Discussion with Rhydian Williams re: Nationwide	JR	SE	DS MH GH PB PH	attorney-client privilege
239(2)	12/9/03	E-mail attached	Nationwide Confidentiality Agreement	SE	JR	DS MH GH PB PH	attorney-client privilege
239(3)	12/9/03	E-mail attached	Nationwide Confidentiality Agreement	JR	SE	DS MH GH PB PH	attorney-client privilege
239(4)	12/8/03	E-mail attached	Nationwide Confidentiality Agreement	MH	JR	DS MH GH PB PH	attorney-client privilege

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
239(5)	12/8/03	E-mail attached	Nationwide Confidentiality Agreement	GH	MH	DS PB PH JR SE	attorney-client privilege
240. (1)	12/5/03	E-mail	E-mail re: Nationwide	JR	SE	DS DL GH PB	attorney-client privilege
240(2)	12/4/03	E-mail attached	Conversation with Nationwide	GH	JR	DS SE DL PB	attorney-client privilege
242.	9/24/03	E-mail with draft agenda, itinerary and action list attached	Proposed Agenda ICC Meeting	DL	SE	AF DS ES GH	attorney-client privilege
245. (1)	9/22/03	E-mail	Letter to Lovells	DS	DL	BR BC GH JC PH SE PB JR RS AF ES	attorney-client privilege work product
245(2)	9/22/03	E-mail attached	Letter to Lovells	JR	DS	BR BC GH JC PH SE PB DL	attorney-client privilege work product
245(3)	9/22/03	E-mail attached	Letter to Lovells	DS	JR	PH JC BR BC SE GH PB DL	attorney-client privilege work product
245(4)	9/22/03	E-mail attached	Letter to Lovells	JR SE GH BC	DS	PH JC BR	attorney-client privilege work product
245(5)	9/22/03	E-mail attached	Letter to Lovells	SD	DS		attorney-client privilege work product
252. (1)	11/12/03	E-mail	Response to UK Informal Creditors Committee	SE DS	PH	GH	attorney-client privilege
252(2)	11/12/03	E-mail	Response to UK	DS	SE	GH	attorney-client

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
		attached	<b>Informal Creditors Committee</b>			PH	privilege
252(3)	11/10/03	E-mail attached	Response to UK Informal Creditors Committee	RS PR AF PB JR GH SE DS PH	DL		attorney-client privilege
262. (1)	10/29/03	E-mail	<b>Letter of Understanding re: Information provided to Home by AFIA Cedants</b>	PH	SE	GH	attorney-client privilege <b>PRODUCED IN REDACTED FORM AT H02571</b>
262(2)	10/28/03	E-mail attached	<b>Letter of Understanding re: Information provided to Home by AFIA Cedants</b>	SE	PH	GH JR JC MH PB DS	attorney-client privilege
262(3)	10/28/03	E-mail attached	<b>Letter of Understanding re: Information provided to Home by AFIA Cedants</b>	PH PB JR JC	SE	GH MH	attorney-client privilege
262(4)	10/25/03	E-mail attached	Letter of Understanding re: Information provided to Home by AFIA Cedants	SE	GH	BC MH	attorney-client privilege
262(5)	10/23/03	E-mail attached	Letter of Understanding re: Information provided to Home by AFIA Cedants	PB GH DL BC JR SE PR MH	DS	PH JC	attorney-client privilege
263. (1)	10/28/03	E-mail	<b>Letter of Understanding re: Information provided to Home by AFIA Cedants</b>	JC JR PH PB	SE	GH MH	attorney-client privilege <b>PRODUCED IN REDACTED FORM AT H02575</b>
263(2)	10/25/03	E-mail attached	Letter of Understanding re: Information provided to Home by AFIA Cedants	SE	GH	BC MH	attorney-client privilege
263(3)	10/23/03	E-mail attached with draft letter attached	Letter of Understanding re: Information provided to Home by AFIA Cedants	PB GH DL BC JR SE PR	DS	PH JC	attorney-client privilege



<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
				MH			
273.(1)	9/24/03	E-mail	Letter to Lovells	DS	ES	BR BC GH JC	attorney-client privilege work product
273(2)	9/22/03	E-mail attached	Letter to Lovells	DS	DL	BR BC GH JC PH SE PB JR RS AF ES	attorney-client privilege work product
273(3)	9/22/03	E-mail attached	Letter to Lovells	JR	DS	BR BC JC PH SE PB DL	attorney-client privilege work product
273(4)	9/22/03	E-mail attached	Letter to Lovells	DS	JR	BR BC GH JC PH SE PB DL	attorney-client privilege work product
273(5)	9/22/03	E-mail attached	Letter to Lovells	JR SE GH BC	DS	PH JC BR	attorney-client privilege work product
273(6)	9/22/03	E-mail attached	Letter to Lovells	SD	DS		attorney-client privilege work product
276.(1)	2/10/04	E-mail	AFIA "Sufficient Number" letter	SE	ES	AF GH JR PR DS DL PB PH	attorney-client privilege
276(2)	2/10/04	E-mail attached	AFIA "Sufficient Number" letter	ES	SE	AF GH JR PR DS DL PB PH	attorney-client privilege
276(3)	2/9/04	E-mail attached	AFIA "Sufficient Number" letter	DS SE	ES	DL	attorney-client privilege

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
				AF PH PB JR GH PR			
277. (i)	2/10/04	E-mail	AFIA "Sufficient Number" letter	ES	SE	AF GH JR PR DS DL PB PH	attorney-client privilege
277(2)	2/9/04	E-mail attached	AFIA "Sufficient Number" letter	DS SE AF PH PB JR GH PR	ES	DL	attorney-client privilege
286. (i)	9/22/03	E-mail	Letter to Lovells	DS	DL	BR BC GH JC PH SE PB JR RS AF ES	attorney-client privilege work product
286(2)	9/22/03	E-mail attached	Letter to Lovells	JR	DS	BR BC JC PH SE PB DL	attorney-client privilege work product
286(3)	9/22/03	E-mail attached	Letter to Lovells	DS	JR	BR BC GH JC PH SE PB DL	attorney-client privilege work product
286(4)	9/22/03	E-mail attached	Letter to Lovells	JR SE GH BC	DS	PH JC BR	attorney-client privilege work product
286(5)	9/22/03	E-mail attached	Letter to Lovells	SD	DS		attorney-client privilege work product
287.	9/24/03	E-mail	ICC Meeting	DL	SE	AF DS	attorney-client privilege

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
						ES GH	
301. (1)	1/22/04	E-mail	Fwd: Home: ICC Package	RS	PB	AF	attorney-client privilege
301(2)	1/22/04	E-mail attached	Home: ICC Package	GH SE	PH	JR PB PR DL ES DS	attorney-client privilege
305. (1)	12/11/03	E-mail	Issues with ICC; Equitas Commutation	DL	PB	ES RS PR AF	attorney-client privilege
305(2)	12/11/03	E-mail attached	Tasks to accomplish prior to Conference call	SE PH DS	GH	PB JR MH	attorney-client privilege 7
307. (1)	12/4/03	E-mail	Gernot	RS	PB	AF PR DL	attorney-client privilege <b>PRODUCED IN REDACTED FORM AT H02577</b>
307(2)	12/3/03	E-mail attached	Gernot	JR	SE	GH PB DL DS	attorney-client privilege
307(3)	12/3/03	E-mail attached	Gernot	SE	JR		attorney-client privilege
317. (1)	11/13/03	E-mail	Statutes of Limitations – Proposed Tolling Agreement	JR	SE	AF DS GH JR PB PH RS MH	attorney-client privilege
317(2)	11/13/03	E-mail attached	Statutes of Limitations – Proposed Tolling Agreement	RS AF PB JR GH SE DS PH	JR		attorney-client privilege
317(3)	11/13/03	E-mail attached	Statutes of Limitations – Proposed Tolling Agreement	DL	JR		attorney-client privilege
337. (1)	10/31/03	E-mail	Proposed Commercial Resolution	RS AF PR PB DL	JR		attorney-client privilege
337(2)	10/31/03	E-mail attached	Proposed Commercial Resolution	PH SE	BC	GH JR	attorney-client privilege

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
337(3)	10/31/03	E-mail attached	Proposed Commercial Resolution	DL	GH	AF DS JR PB PR RS BC MH	attorney-client privilege
337(4)	10/30/03	E-mail attached	Proposed Commercial Resolution	RS AF PR SE PH PB JR GH DS	DL		attorney-client privilege

**Liquidator's Log of Documents Withheld from Production in Accordance with (i) the Liquidator's Response to the ACE Companies' Document Request and (ii) the Liquidator's Response to Benjamin Moore & Co.'s Document Request**

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
5. (1)	11/26/03	E-mail	Cedants' Letter (forwarded to KM by JR)	PB KM	JR	DL	attorney-client privilege
5(2)	11/26/03	E-mail attached	Cedants' Letter	PB JR	SE	DS GH MH	attorney-client privilege
6. (1)	11/26/03	E-mail	Cedants' Letter	PB KM	JR	DL	attorney-client privilege
6(2)	11/26/03	E-mail attached	Cedants' Letter	PB JR	SE	DS GH MH	attorney-client privilege
11. (1)	12/03/03	E-mail	Gernot	SE	JR	DS GH DL PB	attorney-client privilege PRODUCED IN REDACTED FORM AT H02580
11(2)	12/3/03	E-mail attached	Gernot	JR	SE	GH DL PB DS	attorney-client privilege
11(3)	12/3/03	E-mail attached	Gernot	SE	JR		attorney-client privilege
14. (1)	12/5/03	E-mail	Attached e-mails re: Nationwide	SE	JR	DS DL GH PB	attorney-client privilege
14(2)	12/5/03	E-mail attached	Attached e-mails re: Nationwide	JR	SE	DS DL GH SE	attorney-client privilege
14(3)	12/5/03	E-mail attached	Attached e-mails re: Nationwide	GH	JR	DS DL PB SE	attorney-client privilege
14(4)	12/5/03	E-mail attached	JR e-mail re: Nationwide	JR	GH	DS DL PB SE	attorney-client privilege
14(5)	12/4/03	E-mail attached	Conversation with Nationwide	GH	JR	DS DL PB SE	attorney-client privilege
16. (1)	12/8/03	E-mail	Nationwide Confidentiality Agreement	MH	JR	DS GH PB PH SE	attorney-client privilege

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
16(2)	12/8/03	E-mail attached	Nationwide Confidentiality Agreement	GH	MH	DS JR PB SE PH	attorney-client privilege
17. (1)	12/9/03	E-mail	Nationwide Confidentiality Agreement	SE	JR	DS GH MH PB PH	attorney-client privilege
17(2)	12/9/03	E-mail attached	Nationwide Confidentiality Agreement	JR	SE	DS GH MH PB PH	attorney-client privilege
17(3)	12/8/03	E-mail attached	Nationwide Confidentiality Agreement	MH	JR	DS GH PB PH SE	attorney-client privilege
17(4)	12/8/03	E-mail attached	Nationwide Confidentiality Agreement	GH	MH	DS JR PB SE PH	attorney-client privilege
18.	12/11/03	E-mail	Conference call re: ICC Proposal	SE	JR	DS MH PB GH	attorney-client privilege
25. (1)	1/6/04	E-mail	London Meetings	SE	JR	DS GH MH	attorney-client privilege PRODUCED IN REDACTED FORM AT H02765
25(2)	1/6/04	E-mail attached	London Meetings	JR	SE	GH MH DS	attorney-client privilege
25(3)	1/6/04	E-mail attached	Discussions with Nationwide re: Ruddy Pool	SE	JR	GH MH	attorney-client privilege
25(4)	1/6/04	E-mail attached	JR e-mail re: Nationwide	JR	SE	GH MH	attorney-client privilege
25(5)	12/22/03	E-mail attached	Discussions with Nationwide	DS GH DL PB PH SE	JR		attorney-client privilege
27.	1/12/04	E-mail	Unionamerica Call Tomorrow	DS SE	JR	PH	attorney-client privilege
32. (1)	1/19/04	E-mail	Next ICC Meeting	SE	JR	GH PB	attorney-client privilege PRODUCED IN REDACTED FORM AT H02583
32(2)	1/19/04	E-mail attached	Next ICC Meeting	PB JR	SE	GH	attorney-client privilege

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
32(3)	1/15/04	E-mail attached	Next ICC Meeting	SE	GH		attorney-client privilege
32(4)	1/14/04	E-mail attached	Next ICC Meeting	GH	SE	BC DS JR MH PR PH	attorney-client privilege
32(5)	1/13/04	E-mail attached	Next ICC Meeting	SE	GH		attorney-client privilege Communication with counsel
32(6)	1/13/04	E-mail attached	Next ICC Meeting	PH PB DS DL JR PR	SE	GH MH BC	attorney-client privilege
44. (1)	1/13/04	E-mail	Unionamerica call	JR SE	DS	PH	attorney-client privilege
44(2)	1/12/04	E-mail attached	Unionamerica call	DS SE	JR	PH	attorney-client privilege
45.	1/13/04	E-mail	Next ICC Meeting	PH PB DS DL JR PR	SE	GH BC MH	attorney-client privilege
53. (1)	1/13/04	E-mail	Next ICC Meeting	SE	GH	BC DS DL JR MH PB PR PH	Attorney-client privilege
53(2)	1/13/04	E-mail attached	Next ICC Meeting	PH PB DL JR DS PR	SE	GH BC MH	Attorney-client privilege
59. (1)	1/19/04	E-mail	Next ICC Meeting	PB JR	SE	GH	attorney client privilege <b>PRODUCED IN REDACTED FORM AT H02587</b>
59(2)	1/15/04	E-mail attached	Next ICC Meeting	SE	GH		attorney client privilege
59(3)	1/14/04	E-mail attached	Next ICC Meeting	GH	SE		attorney client privilege Document reflects legal advice
59(4)	1/13/04	E-mail attached	Next ICC Meeting	SE	GH	BC DS DL	attorney client privilege

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
						PR JR MH PB PH	
59(5)	1/13/04	E-mail attached	Next ICC Meeting	PH BP DS DL JR PR	SE	GH BC MH	attorney client privilege
60. (c)	1/19/04	E-mail	Next ICC meeting	RS	PB	PR DL JR	attorney client privilege <b>PRODUCED IN REDACTED FORM AT H02591</b>
60(2)	1/19/04	E-mail attached	Next ICC meeting	PB JR	SE	GH	attorney client privilege
60(3)	1/19/04	E-mail attached	Next ICC meeting	SE	GH		attorney client privilege
60(4)	1/14/04	E-mail attached	Next ICC meeting	GH	SE		attorney client privilege Document reflects legal advice
60(5)	1/13/04	E-mail attached	Next ICC meeting	SE	GH	BC DS JR MH PB PR PH	attorney client privilege
60(6)	1/13/04	E-mail attached	Next ICC meeting	PH DL PB DS PR	SE	GH BC MH	attorney client privilege
63. (c)	1/20/04	E-mail	Next ICC Meeting	JR PH DS	SE	GH PB BC	attorney-client privilege <b>PRODUCED IN REDACTED FORM AT H02595</b>
63(2)	1/20/04	E-mail attached	Next ICC Meeting	SE	JR	GH PB	attorney-client privilege
66.	1/22/04	E-mail	AFIA Cedants' letter: Union America	SE	DS	JR DL PR	attorney-client privilege
68.	1/22/04	E-mail	ICC Package	GH SE	PH	JR PB PR DL ES DS	attorney-client privilege
69. (c)	1/23/04	E-mail	ICC Package/Union America	PH	SE	DS ES GH DL	attorney-client privilege



<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
						JR PB PR BC MH	
69(2)	1/22/04	E-mail attached	ICC Package	GH SE	PH	JR PB PR DL ES DS	attorney-client privilege
70.	1/23/04	E-mail	ICC Package/Union America	SE PH	PB	DS ES GH DL JR PR BC MH	attorney-client privilege
83.	11/26/03	E-mail	Cedants' Letter	PB JR	SE	DS GH MH	attorney-client privilege

**APPENDIX 5 PRIVILEGE LOG**

Docket No. 03-E-0106

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

First Produced on 12/21/04

**Liquidator's Log of Documents Withheld from Production in Accordance with (i) the  
Liquidator's Response to the ACE Companies' Document Request and (ii) the Liquidator's  
Response to Benjamin Moore & Co.'s Document Request**

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
13. (c)	12/18/03	E-mail	ACE's View of OSLR reserves	RS	PB	AF	attorney-client privilege <b>PRODUCED IN REDACTED FORM AT H02543</b> Document reflects legal advice
13(2)	12/18/03	E-mail attached	AFIA Figures	PH	MH	DS GH DL BC JR PB PR SE	attorney-client privilege
22. (1)	12/4/03	E-mail	Gernot	SE	GH	DS JR DL PB	attorney-client privilege <b>PRODUCED IN REDACTED FORM AT H02762</b>
22(2)	12/3/03	E-mail attached	Gernot	JR	SE	GH DL PB DS	attorney-client privilege
22(3)	12/3/03	E-mail attached	Gernot	SE	JR		attorney-client privilege
93.		E-mail draft ultimately shared with counsel	Unionamerica and Agrippina	GH	PB		attorney-client privilege Notes concerning communication with counsel
94.		E-mail draft ultimately shared with counsel (see 96(2), 120(2), 266(2))	Unionamerica letter	SE	PB		attorney-client privilege Notes concerning communication with counsel

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
136. (1)	11/26/03	E-mail	Cedants' Letter	JR	KM		attorney-client privilege Document reflects legal advice
136(2)	11/26/03	E-mail attached	Cedants' Letter	KM	JR		attorney-client privilege Document without text, forwards privileged communication
136(3)	11/26/03	E-mail attached	Cedants' Letter	PB KM	JR	DL	attorney-client privilege
179. (1)	11/26/03	E-mail	Cedants' Letter	JR	KM		attorney-client privilege Document reflects legal advice
179(2)	11/26/03	E-mail attached	Cedants' Letter	KM	JR		attorney-client privilege Document without text, forwards privileged communication
179(3)	11/26/03	E-mail attached	Cedants' Letter	PB KM	JR	DL	attorney-client privilege
179(4)	11/26/03	E-mail attached	Cedants' Letter	PB JR	SE	DS GH MH	attorney-client privilege
203. (1)	12/30/03	E-mail	Unionamerica	PH PB DS DL JR	SE	GH BC MH	attorney-client privilege
203(2)	12/30/03	E-mail attached	Unionamerica	GH	SE		attorney-client privilege Document reflects legal advice
301. (1)	1/22/04	E-mail	Fwd: Home: ICC Package	RS	PB	AF	attorney-client privilege Document reflects legal advice
301(2)	1/22/04	E-mail attached	Home: ICC Package	GH SE	PH	JR PB PR DL ES DS	attorney-client privilege

**Liquidator's Log of Documents Withheld from Production in Accordance with (i) the  
Liquidator's Response to the ACE Companies' Document Request and (ii) the Liquidator's  
Response to Benjamin Moore & Co.'s Document Request**

<u>Item #</u>	<u>Date</u>	<u>Document</u>	<u>Subject Matter</u>	<u>To</u>	<u>From</u>	<u>CC</u>	<u>Reason for Withholding</u>
33. (1)	1/22/04	E-mail	Tolling Agreement	PB	JR		attorney-client privilege Document without text, forwards privileged communication
33(2)	1/22/04	E-mail attached with draft agreement attached	Tolling Agreement	JR PR GH SE DL ES DS	PH		attorney-client privilege
84. (1)	11/26/03	E-mail	Cedants' Letter	JR	KM		attorney-client privilege Document reflects legal advice
84(2)	11/26/03	E-mail attached	Cedants' Letter	KM	JR		attorney-client privilege Document without text, forwards privileged communication
84(3)	11/26/03	E-mail attached	Cedants' Letter	PB KM	JR	DL	attorney-client privilege