

Exhibit A

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December 28, 2004

BY E-MAIL

Ronald L. Snow  
Orr & Reno, Professional Association  
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Re: In The Matter Of The Liquidation Of The Home Insurance Company

Dear Ron:

We are writing in further response to your November 8, 2004 letter to Rhydian Williams requesting the production of documents by Mr. Williams and Equitas. We continue to question the validity of the request to the extent it purports to impose upon Mr. Williams or Equitas any obligation to respond. The request is not authorized by New Hampshire Superior Court Rule 35 or the December 19, 2003 Order, the court does not have jurisdiction to subpoena the documents, and the request does not comply with the Hague Convention. Moreover, the requests are extremely overbroad and go well beyond the scope of discovery authorized by the court.

Nevertheless, as we discussed recently, Equitas is willing to make a reasonable production on a voluntary basis provided we can reach agreement as to the scope thereof. Toward that end, we propose the following:

1. Equitas will produce all documents reflecting communications with the Liquidators or Joint Provisional Liquidators concerning the Agreement. This would include communications concerning payments and net recoveries contemplated under the Agreement, payment levels necessary to file a claim, and any correlation between net recoveries and the cost of collection.

2. Equitas will likewise produce all documents reflecting communications with the Liquidators or Joint Provisional Liquidators concerning: (i) alternative means of realizing recovery with respect to the business protected by the AFIA Treaties, (ii) the application of New Hampshire claims and distribution procedures to any claims and assets located in the United Kingdom, (iii) any suggestion that UK assets should be

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"walled off" from United States creditors and distributed to Home UK Branch creditors, and (iv) the UK scheme of arrangement.

3. Equitas is not willing to produce documents reflecting internal communications or communications between or among the AFIA Cedents. In whole or in part, such documents are privileged and confidential and, in all events, are not relevant to an evaluation of the necessity, fairness or reasonableness of the Agreement.

4. Nor is Equitas willing to produce documents concerning (i) the proof of claim filed in the proceeding; (ii) the quantification of contingent liabilities; (iii) claims against Home, the validity of such claims, or the reinsurance contracts giving rise to such claims; (iv) the commutation agreement; (v) the set-off. In whole or in part, these documents are privileged and confidential and, again, not relevant to an evaluation of the necessity, fairness or reasonableness of the Agreement.

5. Equitas has no documents setting forth practices and/or procedures regarding the filing and prosecution of claims in liquidation proceedings or concerning the cost, time or effort incurred in filing and prosecuting such claims. To the extent Mr. Williams' experience is based upon his participation in other such proceedings, Equitas objects to the production of documents relating to such proceedings.

6. The scope of production will incorporate documents created between July 2003 and March 2004.

I believe the foregoing captures the essence of the various requests. Please note that the documents sought, to the extent they exist, are in the possession, custody and control of Equitas. Please feel free to contact me if you would like to discuss any of our responses, particularly if you believe we have overlooked any specific request.

Finally, neither this proposal nor anything else Mr. Williams or Equitas may do in response to your document request should be construed as consent to the jurisdiction of the court, a waiver of any objection thereto, a waiver of any other objection to the document request (including objections to the validity of the request, the manner and effectiveness of service, and the scope of the requests). Equitas, on its own behalf and on behalf of Mr. Williams, reserves all of their rights.

Sincerely,

  
Jack B. Gordon

cc: Gary Lee, Esq.