

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**

AFFIDAVIT OF JONATHAN ROSEN

I, Jonathan Rosen, depose and say:

1. I am the Chief Operating Officer of The Home Insurance Company In Liquidation, a position I have held since shortly after the liquidation commenced. Prior to that, I was Executive Vice President and Reinsurance Counsel of The Home Insurance Company (“Home”) and Executive Vice President of Risk Enterprise Management Limited, a third party administrator that, amongst other things, administered the business of Home. 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. The KWELM Companies (in Scheme of Arrangement since 1993) have historically submitted claims to Home through London market brokers, such as ReSolutions International Ltd. (“ReSolutions”) and Axiom, with respect to Home’s AFIA-related KWELM reinsurance contracts. KWELM advised the brokers of the claims, and the brokers prepared and issued what are known in the London market as CP 13 claim forms, which the brokers presented to ACE INA Services U.K. Limited (“AISUK”), an affiliate of Century Indemnity Company (“CIC”), for adjustment on Home’s behalf. Prior to Home’s liquidation, AISUK acted on the claims without any Home involvement. Since Home’s liquidation, AISUK has made recommendations on the claims to the Liquidator. Because the claims are transmitted through

the brokers, there is a lag – sometimes quite a significant lag – between the time of KWELM’s claim notifications to the brokers and the brokers’ actual claims presentation to AISUK. Claims that are in process between a reinsured (such as KWELM) and a reinsurer (such as Home) are colloquially referred to as “pipeline” claims.

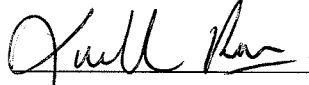
3. Copies of all of the recommendations made by AISUK to the Liquidator (through the Joint Provisional Liquidators) on KWELM claims from January 1, 2006 through April 10, 2006 were attached as Exhibit A to my affidavit in this matter dated April 14, 2006. They consisted of four letters from Mr. Tyndall at AISUK each enclosing the brokers’ CP 13 claim forms with AISUK’s recommendations or (as to certain of the forms) questions noted.

4. The dates that the broker issued the CP 13 claim forms are set forth on the forms. The forms enclosed with Mr. Tyndall’s letters bear dates between October 1997 and October 2005. These claims are “pipeline” claims, and they do not represent action by KWELM to submit claims after February 7, 2006, the date of the Scheme Adjudicator’s decision.

5. The only recommendation made by AISUK/CIC to the Liquidator on KWELM claims since the July 27 Order (namely CIC’s counsel’s letter of November 2, 2006 attached as Exhibit B to CIC’s Motion) did not include CP 13 forms. The Liquidator thus does not know when the broker issued the claims. However, since the KWELM Scheme Administrators confirmed that they would not further pursue claims in the Home liquidation in a letter dated April 12, 2006 (attached as Exhibit 6 to the Liquidator’s Objection dated January 4, 2007), and given the history of lagged pipeline claims in early 2006, it can reasonably be inferred these claims also are pipeline claims.

6. The Liquidator has not submitted any KWELM claims to AISUK/CIC other than through my letter of August 10, 2006 (attached as Exhibit 2 to the Liquidator's Objection).

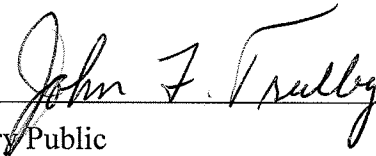
Executed under the penalties of perjury this 12th day of January, 2007.



Jonathan Rosen

STATE OF NEW YORK
COUNTY OF NEW YORK

Subscribed and sworn to, before me, this 12th day of January, 2007.



Notary Public

JOHN F. TRULBY
NOTARY PUBLIC, State of New York
No. 43-4931270
Qualified in Richmond County
Commission Expires June 20, 2010