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January 17, 2012

VIA HAND DELIVERY

William S. McGraw, Clerk  
Merrimack County Superior Court  
163 North Main Street  
Concord, NH 03301

*Re: The Liquidation of the Home Insurance Company  
Docket No. 03-E-0106*

Dear Clerk McGraw:

Enclosed please find Century Indemnity Company's Response To The Liquidator's Settlement Agreement With Rapid-American for filing in the above-referenced matter.

Thank you.

Very truly yours,

Lisa Snow Wade

LSW:pht  
Enclosure  
cc: Counsel of Record  
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**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**

**CENTURY INDEMNITY COMPANY'S RESPONSE TO THE LIQUIDATOR'S  
SETTLEMENT AGREEMENT WITH RAPID-AMERICAN**

Century Indemnity Company (on its own behalf, and on behalf of CIGNA Specialty Insurance Company, formerly known as California Union Insurance Company, and the Indemnity Insurance Company of North America; collectively, "CIC"), by its attorneys Orr & Reno, respectfully submits this Response to the Liquidator's Motion for Approval of Settlement Agreement with Rapid-American Corporation ("Rapid-American") and the Liquidator (the "Settlement Agreement").

Like the Home Insurance Company ("Home"), CIC also issued policies to Rapid-American. To the extent that CIC has made and/or in the future will make any payments to Rapid-American, it is CIC's position that nothing in the Liquidator's Settlement with Rapid-American affects, alters or in any way negates any current and/or future contribution or subrogation claim which CIC has and/or may have against the Home estate in connection with those payments (unless such claim has already been fully resolved).

The Liquidator recognized as much in connection with his motion for the approval of the Settlement Agreement, by acknowledging that a contribution claim has been made in respect of the policies issued to Rapid-American, and stating:

Unlike third party claimants' claims, a contribution claim is independent of the insured's claims (although derived from the same underlying circumstances), and it will remain to be determined on its own merits in the liquidation proceeding.

Liquidator's Motion for Approval of the Settlement Agreement at ¶5 n.1. As a result, any current or future CIC claim for contribution or subrogation in connection with payments made to Rapid-American will remain to be determined on its own merits in the Liquidation.

CIC reserves all of its rights including any rights against all parties; nothing in this statement shall be deemed an admission by CIC or a waiver by CIC of any rights or remedies including, without limitation, claims or defenses.

Respectfully submitted,


CENTURY INDEMNITY COMPANY

By its attorneys,

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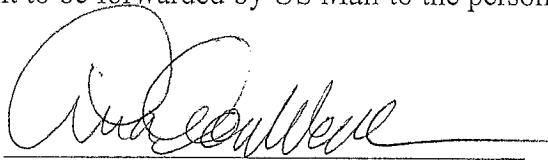
Date: January 17, 2012

By:

  
Lisa Snow Wade (Bar #5595)

CERTIFICATE OF SERVICE

I, Lisa Snow Wade, Esq., hereby certify that on this 17<sup>th</sup> day of January, 2012, I have caused a copy of the attached document to be forwarded by US Mail to the persons listed on the attached service list.

A handwritten signature in black ink, appearing to read "Lisa Snow Wade", written over a horizontal line.

Lisa Snow Wade

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