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March 18, 2013

VIA HAND DELIVERY

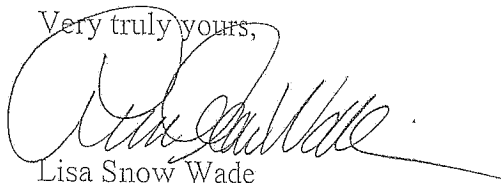
Marshall A. Buttrick, Esq., Clerk
Merrimack County Superior Court
PO Box 2880
Concord, NH 03302-2880

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

Dear Clerk Buttrick:

Enclosed please find ACE's Response To The Liquidator's Motion For Approval Of Settlement Agreement With Rohm and Haas for filing in the above-referenced matter.

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

**ACE'S RESPONSE TO THE LIQUIDATOR'S MOTION FOR APPROVAL OF
SETTLEMENT AGREEMENT WITH ROHM AND HAAS**

Century Indemnity Company (on its own behalf and as successor to CCI Insurance Company, successor to Insurance Company of North America, itself successor to Indemnity Insurance Company of North America; and CIGNA Specialty Insurance Company, formerly known as California Union Insurance Company) (collectively "ACE"), through its attorneys Orr & Reno, respectfully submit this Response to the Liquidator's Motion for Approval of a Settlement Agreement and Mutual Release (the "Settlement Agreement") with Rohm & Haas Company ("Rohm and Haas").

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

The Liquidator has recognized as much in connection with his motions for the approval other settlement agreements, by acknowledging that: "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 be determined under applicable law in the liquidation proceeding.” *E.g.*, Liquidator’s Motion for Approval of Settlement Agreement with Central Illinois at ¶5 n.1. Thus, any current or future ACE claim for contribution in connection with payments made under policies issued to Rohm and Haas will remain to be determined on its own merits in the Liquidation.

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

Respectfully submitted,

CENTURY INDEMNITY COMPANY

By its attorneys,

ORR & RENO, P.A.

One Eagle Square

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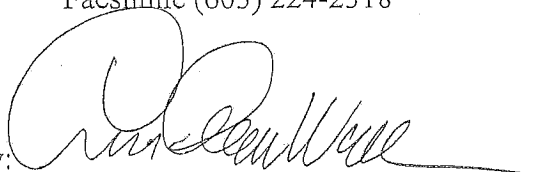
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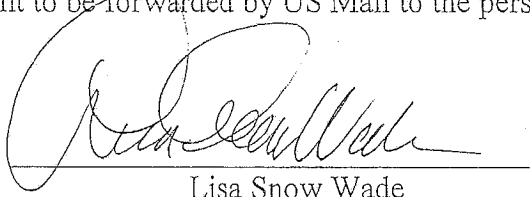
By:



Lisa Snow Wade (Bar #5595)

CERTIFICATE OF SERVICE

I, Lisa Snow Wade, Esq., hereby certify that on this 18th day of March, 2013, 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 cursive script, appearing to read "Lisa Snow Wade", is written over a horizontal line.

Lisa Snow Wade

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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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