

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

Docket No. 03-E-106

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

**CENTURY INDEMNITY COMPANY'S RESPONSE TO THE LIQUIDATOR'S
MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT WITH WTM I
COMPANY**

Century Indemnity Company (on its own behalf, and in its capacity as successor to CCI Insurance Company as successor to Insurance Company of North America, and as successor to Indemnity Insurance Company of North America) (collectively, "CIC") respectfully submits this Response to the Liquidator's Motion for Approval of its settlement agreement with WTM I Company.

The Liquidator's Motion asserts that WTM I Company was a named insured on policies that Home Insurance Company ("Home") issued to Philip Morris, Inc. ("Philip Morris"). Like the Home Insurance Company, CIC also issued policies of insurance to Philip Morris. To the extent that CIC has made and/or in the future will make any payments to in respect of the policies issued to Philip Morris, it is CIC's position that nothing in the Liquidator's Settlement with WTM I affects, alters or in any way negates any current and/or future contribution or subrogation claim which CIC 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 motion for the approval of 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 remain to be determined on its own merits in the

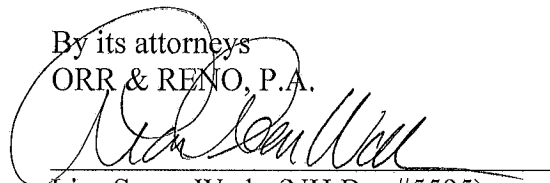
liquidation proceeding.” *E.g.*, Liquidator’s Motion for Approval of Settlement Agreement with Freeport-McMoran at ¶5 n.1. Thus, any future claim CIC may have for contribution in connection with payments made under policies issued to Philip Morris will remain to be determined on their own merits in the 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

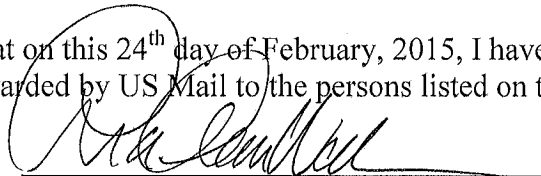
By its attorneys
ORR & RENO, P.A.



Lisa Snow Wade (NH Bar #5595)
45 S. Main Street, Suite 400
PO Box 3550
Concord, NH 03302-3550
Telephone No. (603) 224-2381
Facsimile (603) 224-2318

CERTIFICATE OF SERVICE

I, Lisa Snow Wade, Esq., hereby certify that on this 24th day of February, 2015, I have caused a copy of the attached document to be forwarded by US Mail to the persons listed on the attached service list.



Lisa Snow Wade

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

Docket No. 03-E-106

In the Matter of the Liquidation of
The Home Insurance Company

SERVICE LIST

J. Christopher Marshal, Esq.
NH Department of Justice
33 Capital Street
Concord, NH 03301

Eric A. Smith, Esq.
Rackemann, Sawyer & Brewster
160 Federal Street
Floors 13, 14 & 15
Boston, MA 02110-1700

Lisa S. Wade, Esq.
Orr & Reno, P.A.
45 S. Main Street
PO Box 3550
Concord, NH 03302-3550

Gary Lee, Esq.
Kathleen E. Schaaf, Esq.
James J. DeChristofaro, Esq.
Morrison & Foerster LLP
1290 Avenue of the Americas
New York, NY 10104

Robert A. Stein, Esq.
The Stein Law Firm, PLLC
One Barberry Lane
PO Box 2159
Concord, NH 03302-2159

David M. Spector, Esq.
Dennis G. LaGory, Esq.
Schiff Hardin LLP
6600 Sears Tower
Chicago, Illinois 60606

Michael Cohen, Esq.
Cohen & Buckley, LLP
1301 York Road
Baltimore, MD 21093

David H. Simmons, Esq.
Mary Ann Etzler, Esq.
DeBeaubien, Knight, Simmons,
Mantzaris & Neal, LLP
332 North Magnolia Avenue P.O. Box 87
Orlando, Florida 32901

Martin P. Honigberg, Esq.
Sulloway & Hollis, PLLC
9 Capitol Street
P.O. Box 1256
Concord, NH 03302-1256

Richard Mancino, Esq.
Willkie Farr & Gallagher, LLP
787 Seventh Avenue
New York, NY 10019

Joseph G. Davis, Esq.
Willkie Farr & Gallagher, LLP
1875 K Street, N.W.
Washington, DC 20006

Albert P. Bedecarre, Esq.
Quinn Emaunal Urguhart
Oliver & Hedges, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111

Jeffrey W. Moss, Esq.
Morgan Lewis & Bockius, LLP
115 Franklin Street, 16th Floor
Boston, MA 02110

Gerald J. Petros, Esq.
Hinckley, Allen & Snyder, LLP
50 Kennedy Plaza, Suite 1500
Providence, RI 02903

Christopher H. M. Carter, Esq.
Hinckley, Allen & Snyder, LLP
11 South Main Street, Suite 400
Concord, NH 03301-4810

Robert M. Horkoviceh, Esq.
Robert Y Chung, Esq.
Anderson Kill & Olick, P.C.
1251 Avenue of the Americas
New York, NY 10020

Andrew B. Livernois, Esq.
Ransmeier & Spellman, P.C.
One Capitol Street
P.O. Box 600
Concord, NH 03302-0600

John A. Hubbard, Esq.
615 7th Avenue South
Great Falls, Montana 59404

Paul W. Kalish, Esq.
Ellen M. Farrell, Esq.
Kristine E. Nelson, Esq.
Crowell Moring
1001 Pennsylvania Avenue, NW
Washington, DC 20004-2500

Harry L. Bowles
306 Big Hollow Lane
Houston, Texas 774042

Gregory T. LoCasale, Esq.
White and Williams, LLP
One Liberty Place, Suite 1800
Philadelphia, PA 19103-7395

Kyle A. Forsyth, Esq.
Commercial Litigation Branch
Civil Division
U.S. Dept. of Justice –
PO Box 875
Washington, DC 20044-0875

W. Daniel Deane, Esq.
Nixon, Peabody LLP
900 Elm Street, 14th Floor
Manchester, NH 03101-2031

Joseph C. Tanski, Esq.
John S. Stadler, Esq.
Nixon Peabody LLP
100 Summer Street
Boston, MA 02110

Steven J. Lauwers, Esq.
Rath Young & Pignatelli
One Capital Plaza
PO Box 1500
Concord, NH 03302-1500

1161305_1