

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 SEATTLE UNIVERSITY**

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 (collectively, "Century") respectfully submits this Response to the Liquidator's Motion for Approval of its settlement agreement with Seattle University.

Like the Home Insurance Company ("Home"), Century issued one or more policies of insurance to Seattle University. To the extent that Century has made and/or in the future will make any payments with respect to policies issued to Seattle University, it is Century's position that nothing in the Liquidator's Settlement with Seattle University affects, alters or in any way negates any current and/or future contribution or subrogation claim which Century 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 Century may have for contribution in connection with payments made under policies issued to Seattle University will remain to be determined on their own merits in the Liquidation.

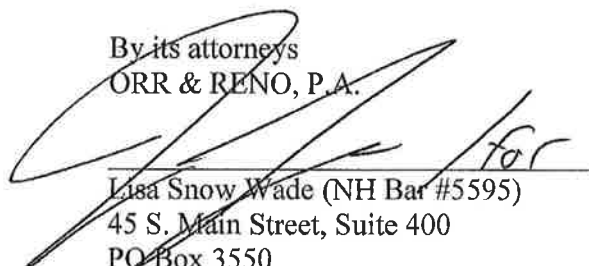
Century requests that the Liquidator retain all closed claim files pertaining to this policyholder. In addition, Century reserves all of its rights including any rights against all parties; nothing in this statement shall be deemed an admission by Century or a waiver by Century of any rights or remedies including, without limitation, claims or defenses.

Respectfully submitted,

CENTURY INDEMNITY COMPANY and
ACE PROPERTY & CASUALTY INSURANCE CO.

By its attorneys
ORR & RENO, P.A.

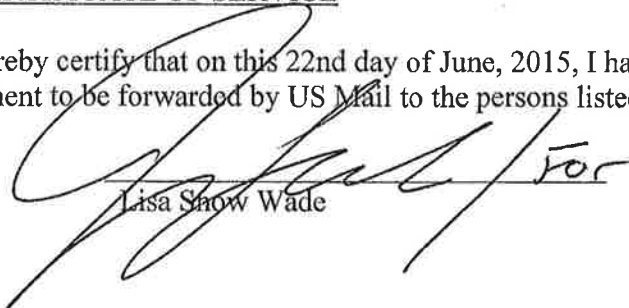
Dated: June 22, 2015



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CERTIFICATE OF SERVICE

I, Lisa Snow Wade, Esq., hereby certify that on this 22nd day of June, 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

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