

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

Docket No. 217-2003-EQ-00106

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

**AFFIDAVIT OF PETER A. BENGELSDORF, SPECIAL DEPUTY
LIQUIDATOR, REGARDING REPORTS TO SCHEME CREDITORS' COMMITTEE**

I, Peter A. Bengelsdorf, hereby depose and say:

1. I was appointed Special Deputy Liquidator of The Home Insurance Company (“Home”) by the Insurance Commissioner of the State of New Hampshire, as Liquidator (“Liquidator”) of Home. I submit this affidavit in support of the Liquidator’s Motion for Approval of Claim Amendment Deadline. The facts and information set forth are either within my own knowledge gained through my involvement with this matter, 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 chart attached as Exhibit A accurately summarizes the amounts of AFIA Cedent-related notices of determination approved by the Court and reinsurance collected on such approved AFIA-related notices of determination over the periods set forth on the chart and as included in the Reports to the Scheme Creditors’ Committee referred to in paragraph 3 below.¹

3. True and correct copies of the following Reports to the Scheme Creditors’ Committee as distributed to the Scheme Creditors’ Committee are attached as Exhibits B-I:

¹ The charts set forth at pages 13 and 14 of the Liquidator’s Response to AFIA Cedents’ Objections to Motion for Approval of Claim Amendment Deadline (filed December 31, 2019) similarly accurately summarize the amounts allowed on AFIA-related notices of determination issued during the periods set forth on the charts, CIC setoffs asserted during the periods set forth on the charts, and reinsurance collected on approved AFIA-related notices of determination over the periods set forth on the charts.

- B. Seventh Report to Scheme Creditors' Committee (December 4, 2012)
- C. Eighth Report to Scheme Creditors (December 2, 2013)
- D. Ninth Report to Scheme Creditors (December 1, 2014)
- E. Tenth Report to Scheme Creditors (February 12, 2016)
- F. Eleventh Report to Scheme Creditors' Committee (March 10, 2017)
- G. Twelfth Report to Scheme Creditors' Committee (March 1, 2018)
- H. Thirteenth Report to Scheme Creditors' Committee (March 8, 2019)
- I. Fourteenth Report to Scheme Creditors' Committee (March 20, 2020)

Signed under the penalties of perjury this 28 day of April, 2020.

Peter A Bengelsdorf

 Peter A. Bengelsdorf
 Special Deputy Liquidator of The Home Insurance
 Company

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached and not the truthfulness, accuracy or validity of that document.

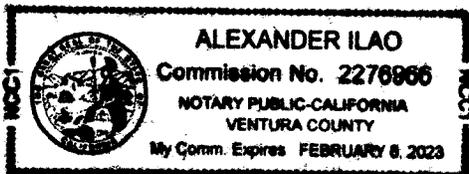
STATE OF CALIFORNIA
 COUNTY OF VENTURA

Alexander Ilao, Notary Public

On April 28, 2020, 2020 before me, ~~Peter A. Bengelsdorf~~, personally appeared Peter A. Bengelsdorf, Special Deputy Liquidator of The Home Insurance Company, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature *Alexander Ilao*
 Signature of Notary Public

The Home Insurance Company, in Liquidation						
Dollar Amount of AFIA Cedent Court-Approved Notices of Determination During 2015-2019						
	2015 ¹	2016	2017	2018	2019	5 Year Average
Total All AFIA Cedents	\$4.0M ²	\$2.7M ³	\$3.2M ⁴	\$3.3M ⁵	\$2.0M ⁶	\$3.0M

The Home Insurance Company, in Liquidation						
Dollar Amount Received from CIC Based on AFIA Cedent Notices of Determination During 2015-2019 (after setoffs)						
	2015 ¹	2016	2017	2018	2019	5 Year Average
Total All AFIA Cedents	\$4.4M ²	\$0.4M ³	\$1.8M ⁴	\$1.8M ⁵	\$0.8M ⁶	\$1.8M

¹ 14 month SCC period of 11/1/14 – 12/31/15

² Tenth SCC Report, page 10 (excluding \$14.3 million commutation for Enstar Group, Tenth SCC Report, page 6)

³ Eleventh SCC Report, page 12

⁴ Twelfth SCC Report, page 5

⁵ Thirteenth SCC Report, page 5

⁶ Fourteenth SCC Report, page 5 (includes \$100,000 AFIA part of commutation for National Casualty Co.)

¹ 14 month SCC period of 11/1/14 – 12/31/15

² Tenth SCC Report, page 5 (excluding \$14.3 million for Enstar Group commutation, Tenth SCC Report, page 6)

³ Eleventh SCC Report, page 6

⁴ Twelfth SCC Report, page 5

⁵ Includes funds received in January 2019; Thirteenth SCC Report, page 6

⁶ Includes \$100,000 AFIA part of commutation for National Casualty Co.; Fourteenth SCC Report, page 5