

**THE STATE OF NEW HAMPSHIRE**

**MERRIMACK, SS.**

**SUPERIOR COURT**  
2025 APR -7 P 3:39

**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  
REPORT OF CLAIMS AND RECOMMENDATIONS AS OF SEPTEMBER 3, 2024**

Century Indemnity Company, (i) in its capacity as successor to CCI Insurance Company as successor to Insurance Company of North America and (ii) in its capacity as successor to CIGNA Specialty Insurance Company (formerly known as California Union Insurance Company”) (collectively, “Century”), respectfully submits this Response to the Liquidator’s Report of Claims and Recommendations as of September 3, 2024.

The Liquidator’s Motion indicates that the Home Insurance Company (“Home”) issued two policies to Claimant for various policy periods between January 1, 1970 and July 10, 1974. Like Home, Century issued one or more policies of insurance to Claimant and has submitted a contribution claim against Home as an offset in the Liquidation. Nothing in the Liquidator’s Settlement with Claimant affects, alters or in any way negates Century’s contribution claim against the Home estate.

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, Century’s claim for contribution in connection with

payments made under policies issued to Claimant will remain to be determined on its own merits in the Liquidation.

Century requests that the Liquidator retain all claim files pertaining to Claimant and 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

By its attorneys,

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Date: April 7, 2025

By: Meredith Anne Golden  
for Lisa Snow Wade (Bar #5595)

CERTIFICATE OF SERVICE

I, Lisa Snow Wade, Esq., hereby certify that on this 7<sup>th</sup> day of April 2025, I have caused a copy of the attached document to be forwarded by US Mail to the persons listed on the service list.

Meredith Anne Golden  
for Lisa Snow Wade