

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**

**CENTURY INDEMNITY COMPANY'S LIMITED OBJECTION TO NOTICE OF
REDETERMINATION OF CLAIM REGARDING ROWBOTHAM POOL**

Century Indemnity Company ("CIC"), by its attorneys Orr & Reno and Lovells, pursuant to RSA 402-C:41 and the Restated and Revised Order Establishing Procedures Regarding Claims Filed with The Home Insurance Company in Liquidation, dated January 19, 2005 (the "Claims Procedures"), respectfully submits this limited Objection to the Notice of Redetermination (the "NOR," attached hereto as Exhibit A) dated June 20, 2006, concerning Proof of Claim No. 700601-01 (the "Claim") submitted by ACE INA Services U.K. Limited ("AISUK") on behalf of the Rowbotham Pool, and respectfully represents as follows.

Background

1. On May 16, 2006, the Liquidator of the Home Insurance Company in Liquidation ("HICIL") issued a Notice of Determination (Partial) No. 1 with respect to the Claim, allowing the total gross amount sought. At the Liquidator's request, AISUK had previously agreed to the gross amount of the Claim and to its aggregate submission on behalf of former Rowbotham Pool members collectively.

2. CIC timely submitted a Request for Review regarding the Liquidator's Notice of Determination, arguing that the Claim was filed on behalf of the Rowbotham pool, an entity which no longer exists. CIC sought a redetermination of the Claim on the grounds that the Claim

cannot be filed and reviewed on a collective basis on behalf of the non-existent pool, and that each individual component of the Claim must be presented and determined as a separate claim.

3. On June 20, 2006, the Liquidator submitted the NOR, which did not modify the original Notice of Determination (Partial) No. 1.

Basis for Limited Objection

4. The Rowbotham Pool no longer exists and claims may not be asserted against HICIL on behalf of it. As an accommodation to the Liquidator, AISUK acceded to his request that the Claim be submitted on a collective basis and agreed to the aggregate amount of the Claim. As such, CIC will not dispute the allowance of the Claim against the HICIL estate.

5. However, AISUK's agreement and submission of the aggregate Claim on a collective basis in the name of the Rowbotham Pool and CIC's decision not to dispute it does not constitute their agreement that future claims submitted against the HICIL estate on behalf of former Rowbotham Pool members may be asserted on a collective basis. Going forward, all claims of former Rowbotham Pool members must be presented and prosecuted separately by the individual former pool members.

Conclusion

5. For the reasons set forth above, CIC does not dispute the Claim, but agrees it on a full without prejudice/reservation of rights basis to (i) object to any future claims of former Rowbotham Pool members which are submitted in the name of the pool and/or on a collective, aggregate basis and (ii) insist that all claims of former Rowbotham Pool members be prosecuted on a stand-alone basis by the individual former pool members.

Dated: August 15, 2006

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document has been served on Roger A. Sevigny, Commissioner of Insurance, Peter Bengelsdorf, Special Deputy, and the following counsel via First Class mail on August 15, 2006:

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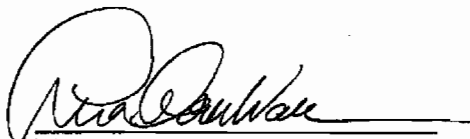
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