

**THE STATE OF NEW HAMPSHIRE**

**MERRIMACK, SS.**

**SUPERIOR COURT**

**BEFORE THE COURT-APPOINTED REFEREE  
IN RE THE LIQUIDATION OF THE HOME INSURANCE COMPANY  
DISPUTED CLAIMS DOCKET**

In re Liquidator Number: 2006-HICIL-18  
Proof of Claim Number: INTL278096  
Claimant Name: Winterthur Swiss Insurance Company

**MOTION TO PARTICIPATE**

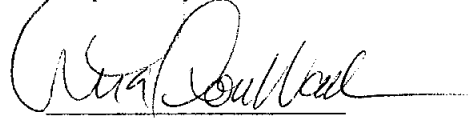
1. Century Indemnity Company (“CIC”), ACE Property and Casualty Insurance Company, Pacific Employers Insurance Company and ACE American Reinsurance Company (collectively, the “ACE Companies”), by their attorneys, Lovells and Orr & Reno P.A., respectfully submit this motion to participate in the above-captioned disputed claim proceeding.

2. The ACE Companies’ right to participate arises pursuant to paragraph 9(b) of the Restated and Revised Order Establishing Procedures Regarding Claims Filed with The Home Insurance Company in Liquidation, dated January 19, 2005. This right has been assented to by the Liquidator of Home under paragraph 2.13 of the Claims Protocol, approved by the Court on November 12, 2004. The Claims Protocol is the product of extensive negotiations between the Liquidator and CIC, and describes the process for CIC’s continued undertaking of Home’s administration and service obligations under the Insurance and Reinsurance Assumption Agreement, dated January 31, 1984 and the Reinsurance Treaty and Management Agreement, dated January 31, 1984.

3. The ACE Companies’ right to interpose defenses in this proceeding on behalf of Home arises under the Insurance and Reinsurance Assumption Agreement.

March 7, 2006

Respectfully submitted,



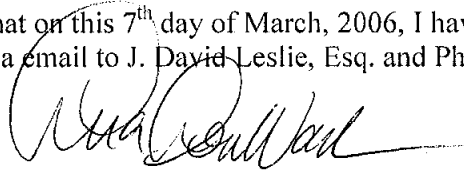
Lisa Snow Wade  
ORR & RENO, Professional Association  
One Eagle Square  
P.O. Box 3550  
Concord, New Hampshire 03302-3550  
Telephone (603) 224-2381  
Facsimile (603) 224-2318

-and-

Gary S. Lee  
Matthew P. Morris  
Dina Z. Gielchinsky  
LOVELLS  
590 Madison Avenue  
New York, New York 10022  
Telephone (212) 909-0600  
Facsimile (212) 909-0660  
Attorneys for Century Indemnity  
Company, ACE Property and Casualty  
Insurance Company, Pacific Employers  
Insurance Company, and ACE American  
Reinsurance Company

Certificate of Service

I, Lisa Snow Wade, Esq., hereby certify that on this 7<sup>th</sup> day of March, 2006, I have caused a copy of the foregoing to be forwarded via email to J. David Leslie, Esq. and Philip Caldicott.



Lisa Snow Wade