

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**

ACE COMPANIES' DISCLOSURE OF WITNESSES

Pursuant to this Court's Order dated May 12, 2005, Century Indemnity Company, ACE Property and Casualty Insurance Company, Pacific Employers Insurance Company and ACE American Reinsurance Company (collectively, the "ACE Companies"), hereby submit this Disclosure of Witnesses in respect of the hearing which will take place on July 25, 2005. The ACE Companies reserve the right to call each of the following as a potential rebuttal witness at the hearing:

- 1) Mr. Tom Wamser
- 2) Mr. Mike Durkin

If called, the testimony of Messrs. Wamser and Durkin will be offered to rebut certain assertions made by the Liquidator in the Offer of Proof, including, but not limited to, those made in paragraphs 14, 21-34, 41-47 and 78-79.

In addition, the ACE Companies reserve the right to call each of the following as a potential expert witness at the hearing:

- 1) Robert F. Craig P.C.
- 2) Richard Hacker, Q.C.

Reports which have been prepared by Messrs. Craig and Hacker are annexed hereto as Exhibits A and B.

The foregoing witnesses should be contacted through counsel for the ACE Companies. The ACE Companies reserve the right to amend this Disclosure of Witnesses up until and during

the July 25, 2005 hearing upon reasonable notice to the opposing parties. The ACE Companies also reserve the right to call any witness listed by any other party.

Respectfully submitted,

Handwritten signature of Ronald L. Snow in cursive, with the initials "LSN" written below the signature.

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Dated: May 27, 2005

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing pleading has been served on Roger A. Sevigny, Commissioner of Insurance, Peter Bengelsdorf, Special Deputy, and the following counsel via First Class mail on May 27, 2005:

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A handwritten signature in black ink, appearing to read "Ronald L. Snow", written over a horizontal line.

Ronald L. Snow