

8 February 2005

Ronald L. Snow  
Orr & Reno  
Attorneys for Century Indemnity Company  
ACE Property and Casualty Company and others  
1 Eagle Square  
PO Box 3550, Concord  
NH03302-3550 USA

Dear Mr Snow,

**In the matter of the liquidation of The Home Insurance Company, Merrimack County Superior Court (New Hampshire) Docket No. 03-E-0106**

I refer to your letter dated 13 January 2005, enclosing a document described as "Respondents ACE Companies' First Request for Production of Documents by Unionamerica Insurance Co". I am responding to this letter both on behalf of Unionamerica Insurance Company Limited (Unionamerica) and in my personal capacity. For the avoidance of any doubt, this response cannot and does not constitute a submission to the jurisdiction of the court in relation to your clients' proceedings.

I am at a loss to see any authority or jurisdiction by which you purport to obtain the discovery in question. In the circumstances, neither I nor Unionamerica propose to make any further response to your request.

Yours sincerely,



Tammy Lewis  
Legal Officer  
St. Paul Specialist Services, Ltd.