

MERRIMACK, SS.

THE STATE OF NEW HAMPSHIRE

SUPERIOR COURT

Docket No. 03-E-0106

2005 JUN 22 P 3:06

In the Matter of the Liquidation of
The Home Insurance Company

ACE COMPANIES' AMENDED 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 Amended 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
- 3) Mr. William O'Farrell

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 limited to those made in paragraphs 14, 21-34, 41-47 and 78-79. The ACE Companies reserve the right to offer Messrs. Wamser and Durkin to rebut assertions made by the Liquidator at trial that vary from or go beyond the scope of the Offer of Proof. If called, the testimony of Mr. O'Farrell will be offered solely to rebut the testimony of Mr. R. Williams regarding purported commutation discussions between Equitas and the ACE Companies.

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 also reserve the right to call any witness listed by any other party.

Respectfully submitted



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Dated: June 22, 2005

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing pleading has been served on Roger A. Seigny, Commissioner of Insurance, Peter Bengelsdorf, Special Deputy, and the following counsel via First Class mail on June 22, 2005:

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