

Lisa Snow Wade
lwade@orr-reno.com
Direct Dial 603.223.9150
Direct Fax 603.223.9050

Orr&Reno
Professional Association

One Eagle Square, P.O. Box 3550
Concord, NH 03302-3550
Telephone 603.224.2381
Facsimile 603.224.2318
www.orr-reno.com

March 21, 2011

VIA HAND DELIVERY

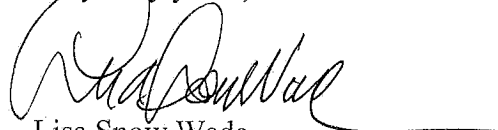
William S. McGraw, Clerk
Merrimack County Superior Court
163 North Main Street
PO Box 2880
Concord, NH 03302-2880

Re: *The Liquidation Of The Home Insurance Company*
Docket No. 03-E-106

Dear Clerk McGraw:

Enclosed please find Century Indemnity Company's Response To The Liquidator's Settlement Agreement With Freeport-McMoran Corp. for filing in the above-referenced matter.

Very truly yours,


Lisa Snow Wade

LSW:pht
Enclosure
cc: Counsel of Record
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MERRIMACK, SS.

THE STATE OF NEW HAMPSHIRE

SUPERIOR COURT

03-E-0106

In the Matter of the Liquidation of
The Home Insurance Company

**CENTURY INDEMNITY COMPANY'S RESPONSE TO THE LIQUIDATOR'S
SETTLEMENT AGREEMENT WITH FREEPORT-MCMORAN CORP.**

Century Indemnity Company (on its own behalf and on behalf of the Insurance Company of North America, Indemnity Insurance Company of North America, and CIGNA Specialty Insurance Company, formerly known as California Union Insurance Company; collectively, "CIC"), by its attorneys Orr & Reno, respectfully submits this Response to the Liquidator's Motion for Approval of a Settlement Agreement and Mutual Release between Freeport-McMoRan Corp., for itself and as successor to Phelps Dodge Corporation ("Phelps Dodge") and certain interests of Kennecott Copper Corporation ("Kennecott") and the Liquidator (the "Freeport-McMoRan Settlement Agreement").

Like the Home Insurance Company ("Home"), CIC also issued policies to Phelps Dodge and to Kennecott, and/or policies under which Phelps Dodge or Kennecott are or may have been insured(s). To the extent that CIC has and/or in the future will make any payments under these policies, it is CIC's position that nothing in the Liquidator's Settlement affects, alters or in any way negates any current and/or future contribution or subrogation claim against the Home estate in connection with those payments. The Liquidator has recognized as much in connection with his motion for the approval other settlement agreements, by acknowledging that: "Unlike third party claimants' claims, a contribution claim is independent of the insured's claims (although derived from the same underlying circumstances), and it will remain to be determined on its own

merits in the liquidation proceeding.” *E.g.*, Liquidator’s Motion for Approval of Settlement Agreement with PECO at ¶6 n.1. Thus, any current or future CIC claim for contribution in connection with payments made under policies issued to Phelps Dodge or Kennecott and and/or policies under which Phelps Dodge or Kennecott were or may have been insured(s) will remain to be determined on its own merits in the Liquidation.

CIC reserves all of its rights including any rights against all parties; nothing in this statement shall be deemed an admission by CIC or a waiver by CIC of any rights or remedies including, without limitation, claims or defenses.

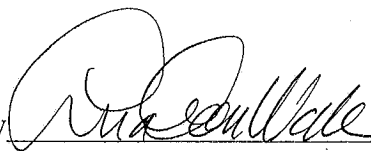
Respectfully submitted,

Century Indemnity Company,

By its attorneys,

ORR & RENO, P.A.
One Eagle Square
P.O. Box 3550
Concord, NH 03302-3550
Telephone (603) 224-2381
Facsimile (603) 224-2318

Date: March 21, 2011

By 
Lisa Snow Wade (5595)

and

Paul Kalish, Esq.
Ellen Farrell, Esq.
Timothy E. Curley, Esq.
Crowell Moring
1001 Pennsylvania Ave, NW
Washington, DC 20004-2500

CERTIFICATE OF SERVICE

I, Lisa Snow Wade, certify that on this 21st day of March, 2011, copies of the foregoing have been sent via US mail to counsel on the attached service list.

A handwritten signature in black ink, appearing to read 'Lisa Snow Wade', written over a horizontal line.

Lisa Snow Wade

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THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

In the Matter of the Liquidation of
The Home Insurance Company
Docket No. 03-E-0106

SERVICE LIST

Roger A. Sevigny,
Commissioner of Insurance
New Hampshire Insurance Department
21 South Fruit Street
Concord, NH 03301

J. David Leslie, Esq.
Eric. A. Smith, Esq.
Rackemann, Sawyer & Brewster
160 Federal Street
Boston, MA 02111

Gary S. Lee, Esq.
Kathleen E. Schaaf, Esq.
James J. DeChristofaro, Esq.
Morrison & Foerster
1290 Avenue of the Americas
New York, NY 10104-0050

Peter Van Tol, Esq.
Lovells
590 Maidson Avenue
New York, NY 10022

Peter G. Callaghan, Esq.
Preti, Flaherty, Beliveau, Pachos
& Haley, PLLP
57 North Main Street
P.O. Box 1218
Concord, NH 03302-1318

George T. Campbell, III, Esq.
Robert A. Stein, Esq.
Robert A. Stein & Associates, PLLC
One Barberry Lane
P.O. Box 2159
Concord, NH 03302-2159

David M. Spector, Esq.
Dennis G. LaGory, Esq.
Schiff Hardin, LLP
6600 Sears Tower
Chicago, Illinois 60606

Michael Cohen, Esq.
Cohen & Buckley, LLP
1301 York Road
Baltimore, Maryland 21093

David H. Simmons, Esq.
Mary Ann Etzler, Esq.
De Beaubien, Knight, Simmons,
Mantzaris & Neal, LLP
332 North Magnolia Avenue
P.O. Box 87
Orlando, Florida 32801

Martin P. Honigberg, Esq.
Sulloway & Hollis, P.L.L.C.
9 Capitol Street
P.O. Box 1256
Concord, NH 03302-1256

Richard Mancino, Esq.
Willkie Farr & Gallagher, LLP
787 Seventh Avenue
New York, NY 10019

Joseph G. David, Esq.
Willkie Farr & Gallagher, LLP
1875 K Street, N.W.
Washington, DC 20006

Albert P. Bedecarre, Esq.
Quinn Emanuel Urguhart
Oliver & Hedges, LLP
50 California Street, 22nd Floor
San Francisco, California 94111

Jeffrey W. Moss, Esq.
Morgan Lewis & Bockius, LLP
115 Franklin Street
16th Floor
Boston, MA 02110

Gerald J. Petros, Esq.
Hinckley, Allen & Snyder, LLP
50 Kennedy Plaza, Suite 1500
Providence, RI 02903

Christopher H. M. Carter, Esq.
Hinckley, Allen & Snyder, LLP
50 Kennedy Plaza, Suite 1500
Providence, RI 02903

Robert M. Horkoviceh, Esq.
Robert Y Chung, Esq.
Anderson Kill & Olick, P.C.
1251 Avenue of the Americas
New York, NY 10020

Andrew B. Livernois, Esq.
Ransmeier & Spellman, P.C.
One Capitol Street
P.O. Box 600
Concord, NH 03302-0600

John A. Hubbard, Esq.
615 7th Avenue South
Great Falls, Montana 59404

Adebowale O. Osijo, Esq.
2015 East Pontiac Way, Suite 203
Fresno, California 93276-3978

Timothy E. Curley, Esq.
Crowell Moring
1001 Pennsylvania Avenue, NW
Washington, DC 20004-2500

Paul Kalish, Esq.
Crowell Moring
1001 Pennsylvania Avenue, NW
Washington, DC 20004-2500

Ellen Farrell, Esq.
Crowell Moring
1001 Pennsylvania Avenue, NW
Washington, DC 20004-2500

Brendan D. McQuiggan, Esq.
White and Williams, LLP
1650 Market Street
One Liberty Place, Suite 1800
Philadelphia, PA 19103-7395

Michael S. Olsan, Esq.
White and Williams, LLP
1650 Market Street
One Liberty Place, Suite 1800
Philadelphia, PA 19103-7395

Kyle A. Forsyth, Esq.
Commercial Litigation Branch
Civil Division
U.S. Dept. of Justice – PO Box 875
Washington, DC 20044-0875
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