

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

**CENTURY INDEMNITY COMPANY'S RESPONSE TO THE LIQUIDATOR'S MOTION
FOR APPROVAL OF SETTLEMENT AGREEMENT WITH CDE**

Century Indemnity Company, on its own behalf and in its capacity as successor to 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 Settlement Agreement (the "Settlement Agreement") with Cornell-Dubilier Electronics, Inc. ("CDE").

The Home Insurance Company ("Home") issued policies to Federal Pacific Electric Company ("FPEC") under which CDE is a named insured. CIC issued policies to Reliance Electric Company ("Reliance"), which, upon information and belief, purchased FPEC in the late 1970s. CIC understands CDE to be an alleged additional insured under the policies that it issued to Reliance. To the extent that CIC has made and/or in the future will make any payments in connection with the policies that CIC issued to Reliance, it is CIC's position that nothing in the Liquidator's Settlement Agreement affects, alters or in any way negates any current and/or future contribution or subrogation claim which CIC has and/or may have against the Home estate in connection with those payments (unless such claim has already been fully resolved).

The Liquidator recognized as much in connection with his motion for the approval of the Settlement Agreement, by acknowledging that contribution claims have been made in respect of the policies issued to FPEC, and stating:

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 be determined under applicable law in the liquidation proceeding.

Liquidator's Motion for Approval of the Settlement Agreement at ¶5 n.2. As a result, any current or future CIC claim for contribution or subrogation in connection with payments made to Reliance and/or CDE 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,

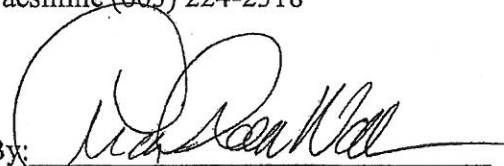
CENTURY INDEMNITY COMPANY

By its attorneys,

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Date: April 9, 2013

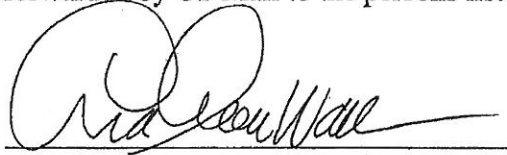
By:



Lisa Snow Wade (Bar #5595)

CERTIFICATE OF SERVICE

I, Lisa Snow Wade, Esq., hereby certify that on this 9th day of April, 2013, I have caused a copy of the attached document to be forwarded by US Mail to the persons listed on the attached service list.

A handwritten signature in cursive script, appearing to read "Lisa Snow Wade", written over a horizontal line.

Lisa Snow Wade

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