

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

Docket No. 03-E-106

**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 WITH WELLS MANUFACTURING COMPANY
AND SKOKIE CASTINGS LLC**

Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America (collectively, "Century") respectfully submits this Response to the Liquidator's Motion for Approval of its settlement agreement with Wells Manufacturing Company ("Wells") and Skokie Castings LLC ("Skokie").

Like the Home Insurance Company ("Home"), Century issued one or more policies of insurance to Wells and/or its successor Charter Manufacturing Company, now known as Charter-Dura-Bar, Inc. ("Charter"). To the extent that Century has made and / or in the future will make any payments under its policies to Wells, Charter, or any of their successors or assignees, it is Century's position that nothing in the Liquidator's settlements with Wells and Skokie affects, alters or in any way negates any current and/or future contribution or subrogation claim which Century may have against the Home estate in connection with those payments (unless such claim has already been fully resolved).

The Liquidator has recognized as much in connection with his motion for the approval of 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

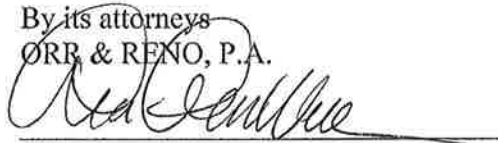
liquidation proceeding.” *E.g.*, Liquidator’s Motion for Approval of Settlement Agreement with Freeport-McMoran at ¶5 n.1. Thus, any future claim Century may have for contribution in connection with payments made under policies issued to Wells or Charter, will remain to be determined on their own merits in the Liquidation.

Century requests that the Liquidator retain all claim files pertaining to these policyholders. In addition, Century reserves all of its rights including any rights against all parties; nothing in this statement shall be deemed an admission by Century or a waiver by Century of any rights or remedies including, without limitation, claims or defenses.

Respectfully submitted,

CENTURY INDEMNITY COMPANY.

By its attorneys
ORB & RENO, P.A.

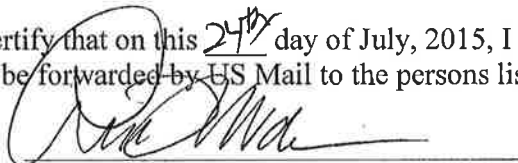


Lisa Snow Wade (NH Bar #5595)
45 S. Main Street, Suite 400
PO Box 3550
Concord, NH 03302-3550
Telephone No. (603) 224-2381
Facsimile (603) 224-2318

Dated: July 24, 2015

CERTIFICATE OF SERVICE

I, Lisa Snow Wade, Esq., hereby certify that on this 24th day of July, 2015, I have caused a copy of the attached document to be forwarded by US Mail to the persons listed on the attached service list.



Lisa Snow Wade

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THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

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

SERVICE LIST

Steven J. Lauwers, Esquire
Michael S. Lewis
Rath Young Pignatelli
One Capital Plaza
Concord, NH 03302-1500

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

Robert A. Stein, Esquire
The Stein Law Firm, PLLC
One Barberry Lane
PO Box 2159
Concord, NH 03302-2159

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

Michael Cohen, Esquire
Cohen & Buckley, LLP
1301 York Road
Baltimore, MD 21093

David H. Simmons
Mary Ann Etzler
Daniel J. O'Malley
deBeaubien Knight Simmons Mantzaris & Neal LLP
332 North Magnolia Avenue
PO Box 87
Orlando, FL 32801

Martin P. Honigberg, Esquire
Sulloway & Hollis, PLLC
9 Capitol Street
PO Box 1256
Concord, NH 03302-1256

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

Joseph G. Davis, Esquire
Willie Farr & Gallagher LLP
1875 K Street, N.W.
Washington, DC 20006

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

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

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

Christopher H.M. Carter, Esquire
Hinckley Allen & Snyder LLP
11 South Main Street, Suite 400
Concord, NH 03301

Robert M. Horkovich, Esquire
Robert Y. Chung, Esquire
Anderson Kill & Olick PC
1251 Avenue of the Americas
New York, NY 10020

Andrew B. Livernois, Esquire
Ransmeier & Spellman PC
One Capitol Street
PO Box 600
Concord, NH 03302-0600

John A. Hubbard
615 7th Avenue South
Great Falls, MT 59405

Paul W. Kalish, Esq.
Ellen M. Farrell, Esq.
Timothy E. Curley, Esquire
Crowell & Moring
1001 Pennsylvania Avenue, NW
Washington, DC 20004-2595

Harry L. Bowles
306 Big Hollow Lane
Houston, TX 77042

Gregory T. LoCasale, Esquire
White and Williams LLP
One Liberty Place, Suite 1800
Philadelphia, PA 19103-7395

Kyle A. Forsyth, Esquire
Commercial Litigation Branch - Civil Division
US Department of Justice
PO Box 875
Washington, DC 20044-0875

W. Daniel Deane, Esquire
Nixon Peabody LLP
900 Elm Street, 14th Floor
Manchester, NH 03861

Joseph C. Tanski, Esquire
John S. Stadler, Esquire
Nixon Peabody LLP
100 Summer Street
Boston, MA 02110

Michael J. Tierney
Wadleigh Starr & Peters PLLC
95 Market Street
Manchester, NH 03101

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