



OFFICE OF
INSURANCE COMMISSIONER

Please reply to:
PO Box 40259
Olympia, WA 98504-0259
FAX: (360) 586-2000

April 8, 2010

STEPHANIE DUCHENE
COUNSEL
SONNENSCHN NATH & ROSENTHAL LLP
601 SOUTH FIGUEROA STREET, STE 2500
LOS ANGELES, CA 90017-5704

Re: Application for Approval of Proposed Merger of Pacific Northwest Title Insurance Company

Dear Ms. Duchene:

During our review of the above application of proposed merger, we request the following information to supplement the filed merger package. Please respond in order of requested information as presented:

1. Please provide the number of policies-in-force of Pacific Northwest Title Insurance Company as of March 31, 2010. Please provide the in-force numbers of residential and commercial properties insured in each county of Washington State.
2. Please provide the contact information for the Pacific Northwest Title policyholders post-merger. This information should contain addresses, phone numbers and/or email addresses for its contact persons.
3. Please provide a sample of the proposed policy endorsement of the merger. This would not be the approval of the form but merely a sample form what Pacific Northwest Title Insurance Company's policyowners would expect to see regarding the merger.
4. What will happen to the intermediate holding company, Pacific Northwest Title Holding Company? We noted that holding company owned other title agencies. Please provide an organizational chart showing any entities that holding company currently owns such as title agencies.
5. What will happen to the title plant owed by Pacific Northwest Title Insurance Company? Could First American Title Insurance Company or Pacific Northwest Title Insurance Company potentially sell that title plant to another entity?

Please respond to this letter within the next 21 business days from your date of receipt.



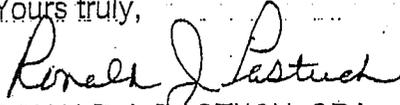
Stephanie Duchene

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If you have any questions, please feel free to contact me at 360-725-7211 regarding this request for information .

Yours truly,



RONALD J. PASTUCH, CPA
Holding Company Manager
Company Supervision Division
Fax: 360-586-2022

cc: Steven Galet, Financial Analysis section, California Department of Insurance