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STATE OF WASHINGTON  
OFFICE OF ADMINISTRATIVE HEARINGS  
FOR THE OFFICE OF INSURANCE COMMISSIONER

In Re:

CHICAGO TITLE INSURANCE COMPANY,

An authorized insurer

Docket No. 2008-INS-0002  
OIC No. D07-308

CHICAGO TITLE INSURANCE  
COMPANY'S DISCLOSURE OF  
POTENTIAL PRIMARY WITNESSES

Chicago Title Insurance Company ("CTIC") hereby submits the list of persons it reserves the right to call as witnesses at the time of trial in Phase I of this proceeding.

1. D. Gene Kennedy, President and Chief Executive Office of Land Title Company of Kitsap County. Mr. Kennedy can be contacted at 9657 Levin Road NW, Suite 300, Silverdale, WA 98383, (360) 698-9432. Mr. Kennedy is expected to testify generally about Land Title Company of Kitsap County ("Land Title"), including its history, business and operational practices and structure, ownership structure, marketing practices, relationship with CTIC, training practices, and corporate governance and Board of Directors. Mr. Kennedy is also expected to testify generally about Land Title Association, his interface through the years with the Washington Office of the Insurance

CHICAGO TITLE INSURANCE COMPANY'S  
DISCLOSURE OF POTENTIAL PRIMARY  
WITNESSES - 1

1 Commissioner ("OIC") as well as the investigation of Land Title's marketing practices conducted by  
2 the OIC that is the subject of this proceeding.

3 2. Linda A. Peterson. Chief Financial Officer of Land Title Company of Kitsap County.  
4 Ms. Peterson can be contacted at 9657 Levin Road NW, Suite 300, Silverdale, WA 98383, (360)  
5 698-9432. Ms. Peterson is expected to testify about Land Title's business operations, financial  
6 matters and accounting practices.  
7

8 3. Steve Green. Vice President and Kitsap County Manager, Land Title Company of  
9 Kitsap County. Mr. Green can be contacted at 9657 Levin Road NW, Suite 300, Silverdale, WA  
10 98383, (360) 698-9432. Mr. Green is expected to testify about Land Title's business operations, its  
11 marketing and underwriting practices, and its relationship and interface with CTIC and with the OIC.  
12

13 4. Don Randolph. Vice President and the Western Agency Manager for CTIC. Mr.  
14 Randolph may be contacted through David C. Neu, K&L Gates, LLP, 925 4th Ave., Ste. 2900,  
15 Seattle, WA 98104, (206) 623-7580. Mr. Randolph is expected to provide testimony about the  
16 nature and business of underwritten title companies ("UTCs"), the structure of CTIC's business  
17 relationships with UTCs, and the relationship between CTIC and Land Title.

18 5. Jodie Schimke. King County Manager of CTIC. Ms. Schimke may be contacted  
19 through David C. Neu, K&L Gates, LLP, 925 4th Ave., Ste. 2900, Seattle, WA 98104, (206) 623-  
20 7580. Ms. Schimke is expected to testify as to the structure and nature of CTIC's direct business  
21 operations in the State of Washington.  
22

23 6. Michael Carroll. Snohomish County Manager of CTIC. Mr. Carroll may be  
24 contacted through David C. Neu, K&L Gates, LLP, 925 4th Ave., Ste. 2900, Seattle, WA 98104,  
25  
26

1 (206) 623-7580. Mr. Carroll is expected to testify as to the structure and nature of CTIC's direct  
2 business operations in the State of Washington.

3 7. Kevin Chiarello. Senior Vice President for Fidelity National Title Group. Mr.  
4 Chiarello may be contacted through David C. Neu, K&L Gates, LLP, 925 4th Ave., Ste. 2900,  
5 Seattle, WA 98104, (206) 623-7580. Mr. Chiarello is expected to testify about CTIC's compliance  
6 efforts with respect to WAC 284-30-800 and the allegations made in the October, 2006, report  
7 issued by the OIC entitled "An Investigation into the Use of Incentives and Inducements by Title  
8 Insurance Companies" (the "OIC Report") as well as testimony about CTIC's operations in  
9 Washington and its relationship with UTCs such as Land Title.

10  
11 8. Bruce Robert. Chief Investigator Department of Licensing. Mr. Robert can be  
12 contacted through the Washington State Department of Licensing at 405 Black Lake Blvd., SW,  
13 Bldg. 2, Olympia, Washington, (360) 664-1400. Mr. Robert is expected to testify generally about  
14 the investigation of Land Title's marketing practices conducted by the OIC and the OIC's guidelines  
15 and protocols.

16  
17 9. Ted Bader. Investigator, OIC. Mr. Bader is expected to testify generally about the  
18 investigation of Land Title's marketing practices conducted by the OIC and the OIC's guidelines and  
19 protocols.

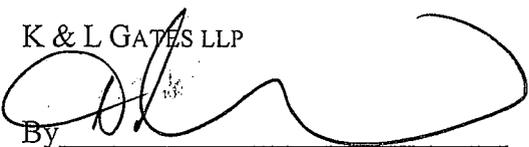
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21 10. Marcia Stickler. Staff Attorney, OIC. Ms. Stickler is expected to testify generally  
22 about the investigation of Land Title's marketing practices conducted by the OIC and the OIC's  
23 policies and practices regarding enforcement of WAC 284-30-800.

24 11. CTIC reserves the right to call as witnesses at the time of trial those other persons  
25 listed on the OIC' Disclosure of Primary Witnesses, as well as other witnesses that may be  
26

1 discovered or required as a result of ongoing discovery herein. In addition, CTIC reserves the right  
2 to call rebuttal witnesses.

3 DATED this 29th day of October, 2008.

4  
5 K & L GATES LLP

6  
7 By 

8 Kimberly W. Osenbaugh, WSBA # 5307

9 David C. Neu, WSBA #33143

10 Attorneys for Chicago Title Insurance Company

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**CERTIFICATE OF SERVICE**

The undersigned declares under the penalty of perjury under the laws of the State of Washington that I am now and at all times herein mentioned a citizen of the United States, a resident of the State of Washington, over the age of eighteen years, not a party-to or interested-in the above-entitled action, and competent to be a witness herein.

On the date below, I caused to be served:

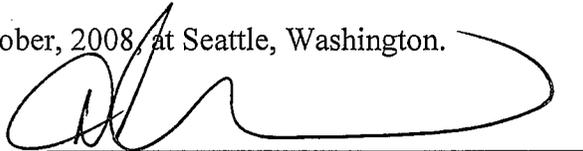
- *Chicago Title Insurance Company's Disclosure of Potential Primary Witnesses*

in the manner indicated:

Alan Michael Singer  
Staff Attorney  
Legal Affairs  
Office of the Insurance Commissioner  
PO Box 40255  
Olympia, WA 98504-0255  
 Via U.S. Mail  
 Via email ([AlanS@OIC.WA.Gov](mailto:AlanS@OIC.WA.Gov))

Hon. Cindy L. Burdue  
Administrative Law Judge  
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P.O. Box 9046  
Olympia, WA 98507-9046  
 Via U.S. Mail  
 Via email ([Rica.Helberg@oah.wa.gov](mailto:Rica.Helberg@oah.wa.gov))

EXECUTED this 29<sup>th</sup> day of October, 2008, at Seattle, Washington.



David C. Neu