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3 BEFORE THE STATE OF WASHINGTON
4 OFFICE OF INSURANCE COMMISSIONER

5 In the Matter of the Acquisition of Control
6 of

7 SAFECO INSURANCE COMPANY OF
8 AMERICA, GENERAL INSURANCE
9 COMPANY OF AMERICA, FIRST
10 NATIONAL INSURANCE COMPANY
11 OF AMERICA, and SAFECO SURPLUS
12 LINES INSURANCE COMPANY

No. G08-0084

Applicant's Disclosure of Witnesses

13 by

14 LIBERTY MUTUAL HOLDING
15 COMPANY, INC., LMHC
16 MASSACHUSETTS HOLDINGS, INC.,
17 LIBERTY MUTUAL GROUP, INC.,
18 LIBERTY MUTUAL INSURANCE
19 COMPANY, LIBERTY INSURANCE
20 HOLDINGS, INC., and LIH US P&C
21 CORPORATION

22 Pursuant to the Order on First Prehearing Conference issued in this matter on Thursday,
23 August 14, 2008, the Applicant in the above-entitled matter provides a Disclosure of
24 Witnesses who will appear on behalf of the Applicant at the hearing on this matter that is
25 scheduled to commence at 10:00 a.m. on Wednesday, September 10, 2008. The
following witnesses will appear on behalf of the applicant:

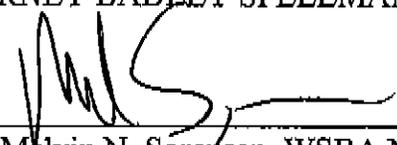
Mr. Michael J. Fallon
Senior Vice President
Liberty Mutual Insurance Company
175 Berkley Street
Mail Stop 07C
Boston, MA 02117

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Mr. Richard P. Quinlan
Senior Vice President and Deputy General Counsel
Liberty Mutual Insurance Company
175 Berkley Street
Mail Stop 03E
Boston, MA 02117

Respectfully Submitted this 29th day of August, 2008.

CARNEY BADLEY SPELLMAN, P.S.

By 
Melvin N. Sorensen, WSBA No. 14817

DECLARATION

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on this day the undersigned deposited in the mails of the United States of America a properly stamped and addressed envelope directed to the following persons:

CHARLES BROWN

containing a copy of the document to which this document is attached.

SIGNED at SEATTLE, Washington this 29th
day of AUGUST, 2008