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OFFICE OF INSURANCE COMMISSIONER

Hearings Unit, DIC  
Patricia D. Petersen  
Chief Hearing Officer

In the Matter of the Proposed Acquisition  
of Control of:

NO. G2007-12

SAFECO INSURANCE COMPANY OF  
AMERICA, GENERAL INSURANCE  
COMPANY OF AMERICA, FIRST  
NATIONAL INSURANCE COMPANY  
OF AMERICA, and SAFECO SURPLUS  
LINES INSURANCE COMPANY,  
Subsidiaries of SAFECO  
CORPORATION, a Washington  
Corporation,  
By LIBERTY MUTUAL HOLDING  
COMPANY, INC., LMHC  
MASSACHUSETTS HOLDINGS, INC.,  
LIBERTY MUTUAL GROUP, INC.,  
LIBERTY MUTUAL INSURANCE  
COMPANY, LIBERTY INSURANCE  
HOLDINGS, INC., and LIH US P&C  
CORPORATION.

**OIC STAFF WITNESS LIST**

Pursuant to the Order on First Prehearing Conference entered August 14, 2008,  
the OIC staff identifies the following individuals as potential witnesses in this matter:

1. Patrick Cantilo, principal in the law firm Cantilo & Bennett, L.L.P., ("C & B"). C & B was retained in this matter by the Washington State Office of Insurance Commissioner ("OIC") through its Company Supervision Division to assist the OIC in the evaluation of the Form A Statement Regarding the Acquisition of Control of or Merger With a Domestic Insurer dated May 16, 2008, filed with the OIC by the above-

listed Liberty Mutual companies. Mr. Cantilo is expected to testify concerning C & B's report, and his review, evaluation, and recommendations.

2. Dana Rudmose and Mark Noller, principals in Rudmose and Noller Advisors, LLC, ("RNA"). RNA was retained in this matter by the Washington State Office of Insurance Commissioner ("OIC") through its Company Supervision Division to assist agency in analyzing historical and prospective financial and other information related to the Form A Statement Regarding the Acquisition of Control of or Merger With a Domestic Insurer dated May 16, 2008, filed with the OIC by the above-listed Liberty Mutual companies. Mr. Rudmose and/or Mr. Noller are expected to testify concerning RNA's report and their review, evaluation, and recommendations.

3. Ron Pastuch, of the Washington State Office of Insurance Commissioner Company Supervision Division is expected to testify to the notice given to the public of the hearing in this matter, any objections or concerns received by the OIC concerning the proposed transaction, to the conclusions he has reached during his examination of the subject Form A as amended relating to the statutory criteria set forth in RCW 48.31B.015(4), and to his recommendations.

Respectfully submitted this 27<sup>th</sup> day of August, 2008.

  
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Charles D. Brown  
OIC Staff Attorney

DECLARATION OF MAILING

I declare under penalty of perjury under the laws of the State of Washington that on the date listed below I mailed or caused delivery of a true copy of this document to parties listed on the Notice of Hearing in this matter.

Signed at Tumwater, Washington this 28<sup>th</sup> day of August, 2008: 