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SEP - 2 2008

Hearings Unit, OIC
Patricia D. Petersen
Chief Hearing Officer

THE HONORABLE PATRICIA D. PETERSEN
CHIEF HEARING OFFICER

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BEFORE THE STATE OF WASHINGTON
OFFICE OF THE INSURANCE COMMISSIONER

No. G08-0084

In the Matter of the Proposed Acquisition
of Control of:

SAFECO INSURANCE COMPANIES'
DISCLOSURE OF WITNESSES

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.

SAFECO INSURANCE COMPANIES'
DISCLOSURE OF WITNESSES - 1

63511-1007/LEGAL14628198.1

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
Phone: 206.359.3000
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PURSUANT TO the Order on First Prehearing Conference issued in this matter on Thursday, August 14, 2008, Safeco Insurance Companies in the above-entitled matter provides a Disclosure of Witnesses who will appear on behalf of Safeco at the hearing on this matter that is scheduled to commence at 10:00 a.m. on Wednesday, September 10, 2008.

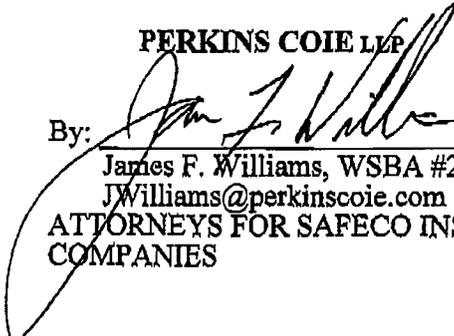
The following witnesses will appear on behalf of Safeco Insurance Companies:

Michael Hughes
Executive Vice President-Insurance Operations
Safeco Insurance Companies
1001 Fourth Avenue
Seattle, WA 98154

DATED this 2nd day of September, 2008.

PERKINS COIE LLP

By:


James F. Williams, WSBA #23613
JWilliams@perkinscoie.com

ATTORNEYS FOR SAFECO INSURANCE COMPANIES

SAFECO INSURANCE COMPANIES'
DISCLOSURE OF WITNESSES - 2

63511-1007/LEGAL14628198.1

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

CERTIFICATE OF SERVICE

CAROL KNESS states as follows:

1. I am a secretary at the law firm of PERKINS COIE LLP, attorneys of record for Safeco Insurance Companies, have personal knowledge of the facts set forth herein and am competent to testify thereto.

2. On the 2nd day of September, 2008, I made arrangements to forward Safeco Insurance Companies' Disclosure of Witnesses to which this Certificate is attached to The Honorable Patricia D. Petersen, Attn: Wendy Galloway, Paralegal, by forwarding the same via fax to (360) 664-2782 and via First Class Mail addressed to:

Office of the Insurance Commissioner
Attn: Wendy Galloway, Paralegal
Hearings Unit
P.O. Box 40255
Olympia, WA 98504-0255

3. On the same day, I made arrangements for copies of the same documents to be delivered to the following via email and First Class Mail:

Richard D. Quinlan, Sr. VP & Deputy General Counsel
Liberty Mutual
175 Berkeley Street
Boston, MA 02117-0140
Richard.Quinlan@libertymutual.com

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Carney Badley Spellman, P.S.
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Seattle, WA 98104-7010
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Patrick Cantilo
Cantilo & Bennett
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758
phcantilo@cb-firm.com; slhiroms@cb-firm.com

SAFECC INSURANCE COMPANIES'
DISCLOSURE OF WITNESSES - 3

63511-1007/LEGAL14628198.1

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Mike Dreidler, Insurance Commissioner
Vernon Stoner, Chief Deputy Insurance Commissioner
James T. Odiorne, Deputy Commissioner
Company Supervision Division
Ronald Pastuch, Holding Manager
Company Supervision Division
Carol Sureau, Deputy Commissioner, Legal Affairs Div.
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Christina Beusch, Asst. Attorney General
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P.O. Box 40100
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LindaD@atg.wa.gov; ChristinaB@atg.wa.gov

I CERTIFY UNDER PENALTY OF PERJURY under the laws of the State of
Washington that the foregoing is true and correct.

SIGNED and DATED at Seattle, Washington, this 2nd day of September, 2008 by
CAROL KNESS.



Carol Kness