

280 Trumbull Street  
Hartford, CT 06103-3597  
Main (860) 275-8200  
Fax (860) 275-8299  
gvarga@rc.com  
Direct (860) 275-8230

Also admitted in Massachusetts

*Via Facsimile and U.S. Mail*

February 21, 2006

Daniel Brown, Esq.  
Brown, Rudnick Berlack Israels LLP  
One Financial Center  
Boston, MA 02111

Re: Marcia Rhodes, Harold Rhodes, et al. v. AIG Domestic Claims, Inc. et al.  
Suffolk Superior Court Civil Action No. 05-1360-BLS

Dear Dan:

This letter responds to your correspondence to Danielle Andrews Long dated February 16, 2006.

We have reviewed Plaintiff's Document Requests numbered 22 through 25 in light of Judge Gants' Order of January 23<sup>rd</sup>. We disagree that the Order requires production of "claims manuals and other claims handling guidelines" on the grand scale contemplated in your letter. Nevertheless, in response to your inquiry, we are exploring with our client whether responsive documents existed at the company during the relevant time frame, other than those that would have been applicable to the operations of the TPA Liability Claims Oversight unit. Once we have made that determination, we will advise you of Zurich's position. Unfortunately, our principal client contact is away from the office this week due to a death in the family, so we will not be able to provide a firm response until next week.

On another matter, be advised that we are working with the Crawford witnesses to identify dates for their depositions in March. However, given the number and locations of the depositions already scheduled, Plaintiffs' insistence on conducting nine depositions in one month, and the vacation and work schedules of the Crawford witnesses (none of whom is employed by Zurich), the scheduling process is proving to be more complicated and time-consuming than anticipated. We expect to respond to your request for deposition dates within the next few days. If the dates you have proposed do not work for these witnesses, we will suggest alternatives.



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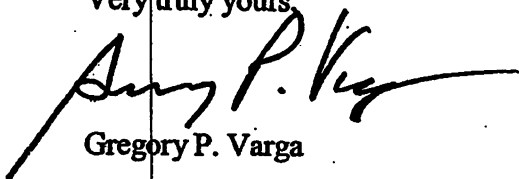
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ROBINSON & COLE<sup>LLP</sup>

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That said, Zurich reserves the right, in accordance with Judge Gants' Order of February 2<sup>nd</sup>, to seek a further stay of depositions in this case should the Single Justice be unable to rule on Zurich's Petition for Interlocutory Relief within a reasonable time prior to the first scheduled deposition.

Very truly yours,



Gregory P. Varga

Copy to: Danielle Andrews Long, Esq.  
Robert J. Maselak, Esq.  
Anthony R. Zelle, Esq.

