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February 22, 2006

VIA E-MAIL AND FIRST CLASS MAIL

Gregory P. Varga, Esq.
Robinson & Cole
280 Trumbull St.
Hartford, Ct 06103-3597

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

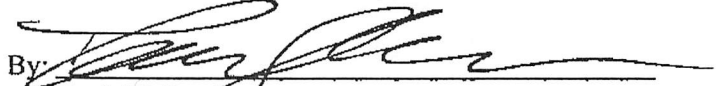
Dear Greg:

I received your letter of February 21, 2006 and it does not address all of the questions raised in my February 16, 2006 letter. Specifically, I have asked for clarification twice as to whether the TPA Liability Claims Oversight unit was the only Zurich unit involved in handling this claim. The reason that we need clarification is because Zurich's Interrogatories state that the Major Case Unit was the unit that handled the Rhodes claim. However, Zurich's Responses to our Document Requests, and your letter from yesterday, name the Liability Claims Oversight unit. One of these representations is incorrect, and Zurich has a duty under Mass. R. Civ. P. 26(e) to supplement its responses to correct the error.

As for the claims manuals, Judge Gants' Order clearly "orders the disclosure by AIG and Zurich of their withheld claims manuals and claim handling guidelines." Order, p. 24; see also Order p. 25, ¶. Given Zurich's continued refusal to abide by the Order, even with depositions scheduled in just a few weeks, Margaret Pinkham or I will be calling you for a Rule 9C conference.

Very truly yours,

BROWN RUDNICK BERLACK ISRAELS LLP

By: 
Daniel J. Brown

cc:

Danielle Andrews Long, Esq.
M. Frederick Pritzker, Esq.
Margaret M. Pinkham, Esq.
Rachel Lipton, Esq.

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