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8 **WILLKIE FARR & GALLAGHER LLP**

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10 Joseph G. Minias (*pro hac vice*)
11 Benjamin P. McCallen (*pro hac vice*)
12 Daniel I. Forman (*pro hac vice*)
13 787 Seventh Avenue
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18 jminias@willkie.com
19 bmccallen@willkie.com
20 dforman@willkie.com

21 *Counsel for Ad Hoc Group of Subrogation Claim Holders*

22 **UNITED STATES BANKRUPTCY COURT**
23 **NORTHERN DISTRICT OF CALIFORNIA**
24 **SAN FRANCISCO DIVISION**

25 **In re:**

26 **PG&E CORPORATION,**

27 **-and-**

28 **PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

* All papers shall be filed in the lead case,
No. 19-30088 (DM)

Chapter 11
Bankr. Case No. 19-30088 (DM)
(Jointly Administered)

**NOTICE OF FILING OF INSURER
ADOPTION AGREEMENT REGARDING
MUTUAL MADE WHOLE RELEASE**

1 The Ad Hoc Group of Subrogation Claim Holders (the “**Ad Hoc Subrogation Group**”) in the
2 above-captioned chapter 11 cases of PG&E Corporation and Pacific Gas and Electric Company
3 (collectively, “**Debtors**”), by its attorneys Willkie Farr & Gallagher LLP and Diemer & Wei, LLP,
4 hereby submits this notice (the “**Notice**”) pursuant to the requirements of the Mutual Made Whole
5 Release. *See Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated*
6 *May 22, 2020* [Docket No. 7521] (the “**Plan**”) at Exhibit C.¹

7 **NOTICE**

8 WHEREAS paragraph I of the Mutual Made Whole Release provides, in part, that “[t]his
9 Mutual Release is conditioned upon the Insurer, or the Insurer’s successor on behalf of the Insurer,
10 filing in the Chapter 11 case the Insurer Adoption Agreement, which states the Insurer releases, as to
11 the Made Whole Doctrine only, each Claimant who signs and agrees to the terms of this Mutual
12 Release.”

13 NOW, THEREFORE, the Ad Hoc Subrogation Group attaches as Exhibit A to this Notice the
14 Insurer Adoption Agreement with all Insurers’ signatures collected to date.²

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¹ Capitalized terms used but not defined shall have the meanings ascribed in the Plan.

27² In the event that more Insurers sign the Insurer Adoption Agreement, the Ad Hoc Subrogation Group will file
28 subsequent notices in these bankruptcy cases.

1 Dated: June 22, 2020

2
3 **WILLKIE FARR & GALLAGHER LLP**

4
5 /s/ Matthew A. Feldman

6 Matthew A. Feldman (*pro hac vice*)

7 Joseph G. Minias (*pro hac vice*)

8 Benjamin P. McCallen (*pro hac vice*)

9 Daniel I. Forman (*pro hac vice*)

10 787 Seventh Avenue

11 New York, NY 10019-6099

12 Telephone: (212) 728-8000

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16 bmccallen@willkie.com

17 dforman@willkie.com

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21 San Jose, CA 95113

22 Telephone: (408) 971-6270

23 Facsimile: (408) 971-6271

24 Email: kdiemer@diemerwei.com

25 *Counsel for Ad Hoc Group of Subrogation Claim Holders*

EXHIBIT A

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as Exhibit A,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name:

By:

Name:

Title:

Assurant (American Security Ins. Co., Standard
Peter J. Loughlin
PETER J. LOUGHLIN
VICE PRESIDENT
Guaranty Ins. Co,
and American
Bankers Ins. Co.)

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.


INSURER ADOPTION AGREEMENT

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Insurer

Carrier Group: Starr Tech

Insurer Names: ACE American Insurance Company
Starr Surplus Lines Insurance Company
General Security Indemnity Company of Arizona

By: 
Name: Paul Casetta
Title: Subrogation Attorney

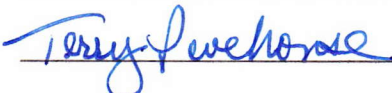
¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Riverstone (Advent)

By: 

Name: Terry Pevehouse

Title: Subrogation Account Manager

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: American International Group, Inc.²

By: *Russell Lippman*

Name: Russell Lippman

Title: Authorized Signatory

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

² This Insurer Adoption Agreement is being entered into on behalf of American International Group, Inc., and its subsidiaries, including, without limitation, the subsidiaries listed in **Exhibit B**.

Exhibit B: Subsidiaries of American International Group, Inc.

AIG Europe Limited

AIG Europe, S.A.

AIG Property Casualty Company

AIG Specialty Insurance Company

American Home Assurance Company

American International Group UK Limited

Commerce and Industry Insurance Company

Granite State Insurance Company

Illinois National Insurance Co.

Lexington Insurance Company

National Union Fire Insurance Company of Pittsburgh, Pa.

New Hampshire Insurance Company

The Insurance Company of the State of Pennsylvania


INSURER ADOPTION AGREEMENT

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Insurer

Carrier Group: Munich RE America

Insurer Names: American Alternative Insurance Company
American Family Home Insurance Company
The Princeton Excess & Surplus Lines Insurance

By: 
Name: Paul Casetta
Title: Subrogation Attorney

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

INSURER ADOPTION AGREEMENT

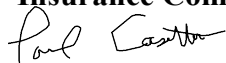
The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Creditor/Carrier Group Name: **American Modern**

Insurer Names: **American Family Home Insurance Company; American Modern Home Insurance Company**

By:



Name:

Paul Casetta

Title:

Subrogation Attorney

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: Amica Mutual Insurance Company

By: 

Name: Bryce Wahl

Title: Associate Claims Examiner

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: All Interested Underwriters standing behind AmRisc

By:

Terry Pevehouse

Name:

Terry Pevehouse _____

Title:

Subrogation Account Manager
Sedgewick | Delegate Authority - Representative

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: AmTrust North America and its underwriting carrier's; Security National Insurance Company, Technology Insurance Company, Inc. and Wesco Insurance Company

By: _____

Name: Ronny Roundtree

Title: Recovery Claims Director

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

Exhibit A: Mutual Made Whole Release

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: American National Property And Casualty

By: 

Name: Stuart M. Paulson, J.D.

Title: S.V.P., P&C Claims

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INSURER ADOPTION AGREEMENT

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Insurer:

APOLLO CREDIT STRATEGIES MASTER FUND, LTD.,
as assignee of Allianz Global Risks US Insurance Company

By: Apollo ST Fund Management LLC, its investment manager

By:  _____

Name: Joseph D. Glatt
Title: Vice President


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The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: **Arch Specialty Insurance Company**

By: 

Name: Paul Casetta

Title: Subrogation Attorney

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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: Certain Underwriters at Lloyd's

By: _____

Name: Elena Rojas

Title: Subrogation TPA Account Manager

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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as Exhibit A,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name:

Global Indemnity

By:

[Signature]

Name:

David Elliott

Title:

SVP Claims

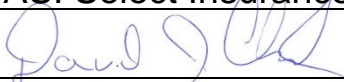
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Insurer

Insurer Name: ASI Select Insurance Corp.

By: 

Name: David Clark

Title: Subrogation Supervisor

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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as Exhibit A¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

* Aspen American Insurance Co.
Aspen Insurance UK Limited

Insurer

Insurer Name:

Aspen Specialty Insurance Co. *

By:

Anthony Annello

Name:

Anthony Annello

Title:

V.P., Property Claims

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INSURER ADOPTION AGREEMENT

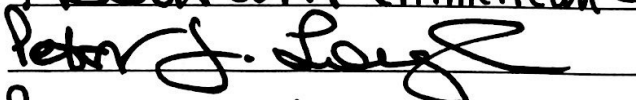
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Insurer

Insurer Name:

Assurant (American Security Ins. Co., Standard

By:



Guaranty Ins. Co,
and American
Bankers Ins. Co.)

Name:

PETER J. LOUGHLIN

Title:

VICE PRESIDENT


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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: Attestor Value Master Fund

By: 

Name: Christopher Guth

Title: Authorised Attorney

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Insurer

Carrier Group: Axis Specialty

Insurer Names: Axis Specialty Europe SE

Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
PN1700079

By:



Name:

Paul Casetta

Title:

Subrogation Attorney

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Insurer

Insurer Name: Barbican Managing Agency Limited for and on behalf of Syndicate 1955 at Lloyds

By: Sian Martin

Name: Sian Martin

Title: Syndicate 1955 Claims Manager

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Exhibit A: Mutual Made Whole Release

INSURER ADOPTION AGREEMENT

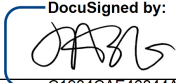
The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

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Insurers

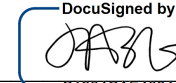
BG RESOLUTION PARTNERS I-A, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

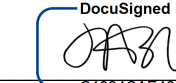
BG RESOLUTION PARTNERS I-B, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

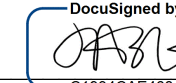
BG RESOLUTION PARTNERS II-A, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

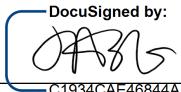
BG RESOLUTION PARTNERS II-B, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

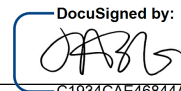
BG RESOLUTION PARTNERS III-A, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

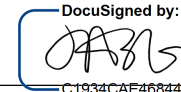
BG RESOLUTION PARTNERS III-B, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

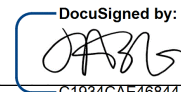
BG RESOLUTION PARTNERS IV-A, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

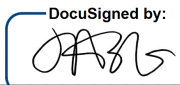
BG RESOLUTION PARTNERS IV-B, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

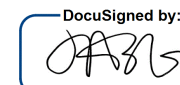
BG RESOLUTION PARTNERS V-A, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

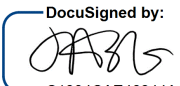
BG RESOLUTION PARTNERS V-B, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

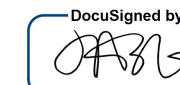
BG RESOLUTION PARTNERS VI, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

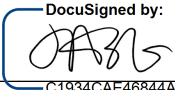
BG RESOLUTION PARTNERS VII, L.L.C.

By BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

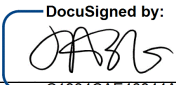
BG INVESTMENT PARTNERS I-B, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

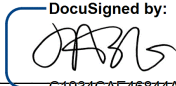
BG INVESTMENT PARTNERS II-A, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

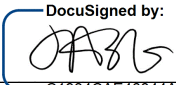
BG INVESTMENT PARTNERS II-B, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

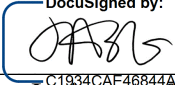
BG ACQUISITION PARTNERS I-A, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

BG ACQUISITION PARTNERS I-B, L.L.C.

By: BRP Partners II, Inc., its Manager

By: 
Name: Joshua A. S. Greenhill
Title: Vice President

BG SUBROGATION PARTNERS I-A, L.L.C.

By: BRP Partners II, Inc., its Manager

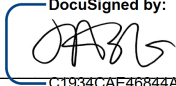
By: 
Name: Joshua A. S. Greenhill
Title: Vice President

Exhibit A: Mutual Made Whole Release

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Carrier Group: Beazley

Insurer Names: Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
PTAM1701507
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
B128415509W18
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
W1D52B160101
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
W1DC80180201

By: 

Name: Paul Casetta

Title: Subrogation Attorney

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Berkley National Insurance Co. and Berkley Regional Insurance Co.

By: 

Name: Scott G. Johnson

Title: Attorney of Record

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

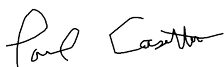
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Insurer

Carrier Group: Berkshire Hathaway

Insurer Names: Berkshire Hathaway Specialty Insurance Company
National Fire & Marine Insurance Company

By: 

Name: Paul Casetta

Title: Subrogation Attorney

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: California Casualty Indemn Exchange
By: Jeff Gratias
Name: [Signature]
Title: Claim Director of Operations

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

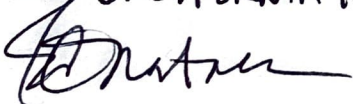
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Insurer

Insurer Name: CALIFORNIA FAIR PLAN ASSOCIATION

By:



Name: ESTEE C. NATALE

Title: VP- CLAIMS

- 2 -

WFG Draft 5/13/20
Privileged & Confidential

Exhibit A: Mutual Made Whole Release

- 2 -

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as Exhibit A,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name:

CALIFORNIA MUTUAL

By:



Name:

MATT CURLEY

Title:

DIRECTOR of CLAIMS

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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: Canopius Managing Agents Ltd.

By: 

Name: Jill Kumm

Title: On behalf of Canopius Managing Agents Ltd.

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Precision Risk Management, Inc. on behalf of Century National Insurance

By:

Name:

Title:

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Chubb

By: *John Serio*

Name: John Serio

Title: AVP, Litigation Specialist, Subrogation, NA Claims

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as Exhibit A,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: California Insurance Guarantee Association

By: Brad Roebber

Name: BRAD ROEBBER

Title: EXECUTIVE DIRECTOR

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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: The Cincinnati Insurance Companies



Recoverable Signature

X 

Jay O'Hara

Asst Secretary / Manager

Signed by: jay_ohara@cinfin.com

By:

Name:

Title:

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer CNA and its entities: American Casualty Company, Continental Casualty Company, Continental Insurance Company, National Fire Insurance Company of Hartford, Transportation Insurance Company, and Valley Forge Insurance Company

Insurer Name: _____

By: _____

Name: _____

Peter McCarron

Title: _____

SVP Claim

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Cowen Special Investments LLC

By:  _____

Name: Burton Wells

Title: Authorized Signatory

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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: Crestmont Insurance Company

By: 

Name: Paul Casetta

Title: Subrogation Attorney

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as Exhibit A,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: Crusader Insurance Company

By:  6-4-20

Name: Adam LaPierre

Title: Chief Claims Officer


¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: CSE Insurance Group

By: 

Name: Diana Puig

Title: Vice President of Claims

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: THE DENTISTS INSURANCE COMPANY

By: 

Name: ROBERT SPINELLI

Title: CEO

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INSURER ADOPTION AGREEMENT

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InsurerInsurer Name: EMC Insurance CompaniesBy: Name: Rowdy EvansTitle: subrogation consultant

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INSURER ADOPTION AGREEMENT

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Insurer

Carrier Group: Sampo International

Insurer Names: Endurance American Specialty Insurance Company
Endurance Specialty Insurance Company

By: Paul Casetta

Name: Paul Casetta

Title: Subrogation Attorney

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INSURER ADOPTION AGREEMENT

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Insurer

Carrier Group: Everest

Insurer Names: Everest Indemnity Insurance Company
Everest National Insurance Company

By: 

Name: Paul Casetta

Title: Subrogation Attorney

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Everest National Insurance Company

By: *Takiea Mance*

Name: Takiea Mance

Title: Claims Examiner II

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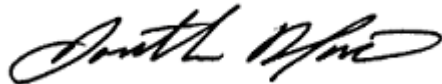
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Insurer

Insurer Name: Farmers Insurance *

By:



Name: Jonathan Hart

Title: Director of Subrogation

* 21st Century Insurance Company, COAST NATIONAL INSURANCE COMPANY, Farmers Insurance Company of Idaho, Farmers Insurance Company of Oregon, Farmers Insurance Exchange, FARMERS SPECIALTY INSURANCE COMPANY, Fire Insurance Exchange, FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN, FOREMOST PROPERTY AND CASUALTY INSURANCE COMPANY, FOREMOST SIGNATURE INSURANCE COMPANY, Illinois Farmers Insurance Company, Insurance Underwriting Company, Mid-Century Insurance Company, and Truck Insurance Exchange

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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as Exhibit A,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name:

Federated Insurance

By:

Toni E. Willey

Name:

Toni E. Willey

Title:

Regional Claims Manager

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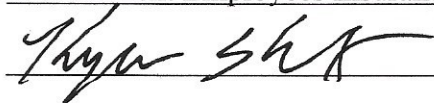
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Insurer

Insurer Name: Government Employees Insurance Company

By:



Name:

Kyle Short

Title:

Subrogation Manager

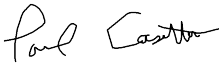
¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

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Insurer

Insurer Name: Generali US Branch

By: 

Name: Paul Casetta

Title: Subrogation Attorney

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: GRANGE INSURANCE ASSOCIATION

By: /s/ *Brandon Mathias* (electronic signature provided due to present lack of printer or scanner)

Name: Brandon Mathias

Title: Claims Manager


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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Great American Insurance Company
 Great American Assurance Company
 Great American E&S Insurance Company
 Great American Insurance Company of New York
 Great American Alliance Insurance Company
 Great American Spirit Insurance Company

By: 
Name: Raymond H. Corley
Title: Divisional Vice President Corporate Claims

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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as Exhibit A,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: Great American Insurance

By: Chris L. Wright

Name: Chris L. Wright

Title: Divisional Assistant Vice-President of Claims,
Specialty Equipment Division

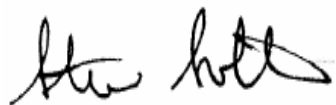
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Insurer

Insurer Name: Great Lakes Reinsurance (SE)

By: _____

Name: Steven Soltman

Title: Its Attorney and Authorized Representative

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as Exhibit A, and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: *Berkshire Hathaway Guard Insurance Company*

By: *Quinn Conaboy*

Name: *Quinn Conaboy*

Title: *Subrogation Manager*

- 2 -

*WFG Draft 5/13/20
Privileged & Confidential*

Exhibit A: Mutual Made Whole Release

- 2 -

INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: GuideOne Insurance

By:

A handwritten signature in blue ink, appearing to read "Brian Nelson", is written over a horizontal line.

Name: Brian Nelson

Title: SVP Claim

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: HAGERTY Ins. Co.

By: Stephen A. Seiber

Name: SA Seiber

Title: Recovery Manager

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Hartford Accident & Indemnity Company and affiliates, including Trumbull Insurance Company, Hartford Fire Insurance Company, Sentinel Insurance Company, Ltd., Hartford Casualty Insurance Company, Hartford Underwriters Insurance Company, Property & Casualty Insurance Company of Hartford, Twin City Fire Insurance Company

By:



Name:

Jason Kuselias

Title:

Assistant Vice President

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INSURER ADOPTION AGREEMENT

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Insurer

Carrier Group: HDI Global

Insurer Names: HDI Global SE
HDI Global Insurance Company
International Insurance Company of Hannover SE

By: 

Name: Paul Casetta

Title: Subrogation Attorney

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Houston Casualty Company

By: Fidelis Claims Services LLC

Name: 

Title: Senior Director-Inland Marine Claims

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Interinsurance Exchange of the Automobile Club

By: 

Name: John K. Beckley

Title: Deputy General Counsel

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INSURER ADOPTION AGREEMENT

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Insurer

Carrier Group: Ironshore

Insurer Names: Ironshore Insurance, Ltd.
Ironshore Specialty Insurance Company

By: 

Name: Paul Casetta


Title: Subrogation Attorney

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Leading Insurance Services, Inc., US Manager for
Kookmin Best Insurance Co.
By: 
Ltd, US Branch
Name: Sally Song
Title: Claims Analyst

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INSURER ADOPTION AGREEMENT

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Insurer

Carrier Group: RSUI Group

Insurer Names: Landmark American Insurance Company
RSUI Indemnity Company

By: 

Name: Paul Casetta

Title: Subrogation Attorney

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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

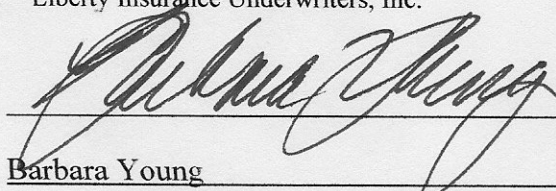
Insurer

Insurer Name: Liberty Mutual Insurance Company on behalf of itself and any and all of its affiliates and subsidiaries, including, without limitation:

- American Economy Insurance Company
- American Fire & Casualty Company
- American States Insurance Company
- American States Preferred
- Employers Insurance Company of Wausau
- First Liberty Insurance Group
- First National Insurance Company of America
- General Insurance Company of America
- Golden Eagle Insurance Company
- Ironshore Indemnity Inc.
- Ironshore Insurance Ltd.
- Ironshore Specialty Insurance Company
- Liberty Insurance Corporation
- Liberty Insurance Underwriters, Inc.
- Liberty Mutual Holding Company
- Liberty Mutual Insurance Company
- Liberty Mutual Insurance Europe Ltd.
- Liberty Mutual Fire Insurance Company
- Liberty Surplus Insurance Company
- LM General Insurance Company
- Ohio Casualty Insurance Company
- Ohio Security Insurance Company
- Peerless Indemnity Insurance Company
- Peerless Insurance Company
- Safeco Insurance Company of America
- Safeco Insurance Company of Illinois
- Safeco Insurance Company of Oregon
- West American Insurance Company

By:

Name:


Barbara Young

Title:

Senior Claims Manager

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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: Certain at Lloyds, London (Atrium)

By: _____

Name: Steven Soltman

Title: Its Attorney and Authorized Representative

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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: Certain Underwriters at Lloyds, London (Novae)

By: _____

Name: Steven Soltman

Title: Its Attorney and Authorized Representative

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INSURER ADOPTION AGREEMENT


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Insurer

Carrier Group: Argo Global

Insurer Names: Certain Underwriters at Lloyd's of London UK Subscribing to Policy No. B0429BA1704109
Certain Underwriters at Lloyd's of London UK Subscribing to Policy No. B1230AP01428A17;
Certain Underwriters at Lloyd's of London UK Subscribing to Policy No. B126BW0024518ADA
Certain Underwriters at Lloyd's of London UK Subscribing to Policy No. B1156OARPAR180N
Certain Underwriters at Lloyd's of London UK Subscribing to Policy No. NGW44183016
Certain Underwriters at Lloyd's of London UK Subscribing to Policy No. ABLD058028
Certain Underwriters at Lloyd's of London UK Subscribing to Policy No. B1526003441300301
Certain Underwriters at Lloyd's of London UK Subscribing to Policy No. B1230AP01428A17
Certain Underwriters at Lloyd's of London UK Subscribing to Policy No. B1262BW0024518
Certain Underwriters at Lloyd's of London UK Subscribing to Policy No. B1156BD1700735000

By:



Name:

Paul Casetta

Title:

Subrogation Attorney

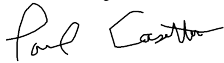
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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Certain Underwriters at Lloyd's of London, UK and Insurers Subscribing to
Policy No. B1230AP56189A17

By: 

Name: Paul Casetta

Title: Subrogation Attorney

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INSURER ADOPTION AGREEMENT

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Insurer

Carrier Group: Canopus

Insurer Names: Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
B57635DAA
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
B63355AAA
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
B55721BAA

By:



Name:

Paul Casetta

Title:

Subrogation Attorney

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INSURER ADOPTION AGREEMENT

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Insurer

Carrier Group: Novae Group

Insurer Names: Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
LSI100402-05
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
LSI103618-01
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
B0507L16360-521
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
LSI100966-04

By: 

Name: Paul Casetta

Title: Subrogation Attorney

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INSURER ADOPTION AGREEMENT

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Insurer

Carrier Group: Tokio Marine-HCC

Insurer Names: Certain Underwriters at Lloyd's of London, UK and Insurers Subscribing to
Policy No. P17A1770A001
Certain Underwriters at Lloyd's of London, UK and Insurers Subscribing to
Policy No. P17B6450A001

By: 
Name: Paul Casetta
Title: Subrogation Attorney

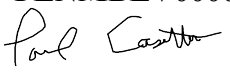
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Insurer

Insurer Name: **Certain Underwrites at Lloyd's of London Subscribing to Policy No. PLNMBLV00001318** (Argenta Holdings Limited)

By: 

Name: Paul Casetta

Title: Subrogation Attorney

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INSURER ADOPTION AGREEMENT

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Insurer

Carrier Group: Cincinnati Global Underwriting, Ltd.

Insurer Name: Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. B123AP01428A18-16247
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. H3X00642
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. H3X00697
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. H3X00826
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. H3X00540
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. H3X00910
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. H3X00606
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. H3X00266
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. PN1600673
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. ECF056681
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. PG1700158
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. PRPNA16006676
Certain Underwriters at Lloyd's of London, UK and Insurers Subscribing to Policy No. PTNAM1802877

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By: Paul Casetta
Name: Paul Casetta
Title: Subrogation Attorney

INSURER ADOPTION AGREEMENT

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Insurer

Carrier Group: Ascot Group

Insurer Names: Certain Underwriters at Lloyd's of London UK Subscribing to Policy No.
PN1700157
Certain Underwriters at Lloyd's of London UK Subscribing to Policy No.
PN1700364

By: 

Name: Paul Casetta

Title: Subrogation Attorney

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
PSLPLI06107

By: 

Name: Paul Casetta

Title: Subrogation Attorney

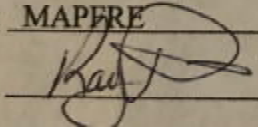
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Insurer

Insurer Name: MAPERE

By: 

Name: Ray Borski

Title: Subrogation Adjuster

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Markel Syndicate Management

By: *K Reeder*

Name: Kelly Reeder

Title: Claims Manager

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Markel Service, Incorporated

By: _____

Tim Anderson

Name: Timothy M. Anderson

Title: Director, Claims

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Maxum Indemnity Company

By: /s/ Amara E. Bennett (electronic signature provided due to present lack of access to printer or scanner)

Name: Amara E. Bennett, CIIP, DAE

Title: Sr. Claims Specialist, Complex Commercial Property

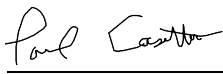
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Insurer

Insurer Name: Maxum Indemnity Company

By: 

Name: Paul Casetta

Title: Subrogation Attorney

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Mercury Insurance Company

By: 

Name: Christopher O'Rourke

Title: VP Property Claims

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: MetLife
By: [Signature]
Name: Mark Haged
Title: Sr Subrogation Analyst

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer Name:

Allied P&C Insurance Company
AMCO Insurance Company
Crestbrook Insurance Company
Depositors Insurance Company
Harleysville Insurance Company
Nationwide Agribusiness Insurance NAIC
Nationwide Insurance Company of America
Nationwide Mutual Fire Insurance Company
Nationwide Mutual Insurance Company
Scottsdale Indemnity Company
Scottsdale Insurance Company
Western Heritage Insurance Company
Victoria Fire and Casualty Company

By:



Name: Klaus Diem

Title: Senior Vice President, Chief Risk Officer

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Great Divide Insurance Co. / Nautilus Insurance Co.

By: 

Name: Harpreet Singh

Title: Subrogation Manager

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Nautilus Insurance Company

By: 

Name: MARK Nestor

Title: Sr Technical Coordinator

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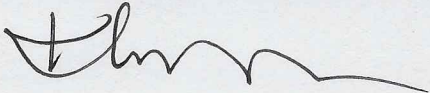
INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: NONPROFITS INSURANCE ALLIANCE OF CALIFORNIA

By:



Name:

KIMBERLY ADAIR

Title:

CFO & TREASURER

- 2 -

WFG Draft 5/13/20
Privileged & Confidential

Exhibit A: Mutual Made Whole Release

- 2 -

INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Atlantic Specialty/OneBeacon

By: [Signature] E. Maus 6/1/2020

Name: David E. Maus

Title: Recovery Examiner

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INSURER ADOPTION AGREEMENT

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Insurer

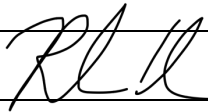
Insurer Name: Oregon Mutual Insurance Company
By: Chh S Katter
Name: CHARLES S. KATTER
Title: Vice President - Claims

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INSURER ADOPTION AGREEMENT

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Insurer

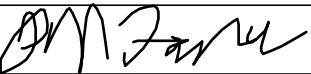
Insurer Name: MCHA Holdings, LLC
By: 
Name: Reuben Kopel
Title: Authorized Signatory

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: Pacific Specialty Insurance Company
By: 
Name: Patricia M. Fama
Title: Director/Senior Counsel

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INSURER ADOPTION AGREEMENT

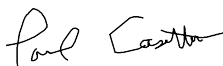
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Insurer

Carrier Group: Peninsula Insurance Bureau

Insurer Names: Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. PIV106864
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. PIV110301
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. PIV106514
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. PIV105719
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. PIV106859
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. PIV105114
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. PIV105626
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. PIV105143
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No. PIV119634
American National Insurance Company

By:



Name:

Paul Casetta

Title:

Subrogation Attorney

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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as Exhibit A,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: Pharmacists Mutual Insurance Company

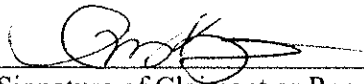
By: 

Name: Tim Kitzinger

Title: Assistant Vice President, Claims

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

BY CLAIMANT [Add Name]:



Signature of Claimant or Representative

Iny Kitzinger

Printed Name of Signator

Assistant Vice President, Claims
Capacity of Signator

INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Philadelphia Indemnity Insurance Co.

By: *Bob Finizio*

Name: Robert P. Finizio

Title: Senior Claims Examiner

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Philadelphia Indemnity Insurance Company

By: Randy Steinberg

Name: Randy Steinberg

Title: Claims Examiner

- 2 -

WFG Draft 5/13/20
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Exhibit A: Mutual Made Whole Release

- 2 -

INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Progressive Group of Insurance Companies

By: *Julie Marinchick*

Name: Julie Marinchick

Title: Sr Mgr Subrogation

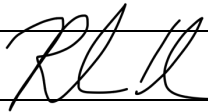
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Insurer

Insurer Name: MCHA Holdings, LLC

By: 

Name: Reuben Kopel

Title: Authorized Signatory

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Privilege Underwriters Reciprocal Exchange
By: Marion Dimetrosky
Name: Marion Dimetrosky
Title: Subrogation Manager

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INSURER ADOPTION AGREEMENT

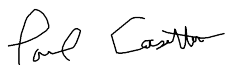
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Insurer

Carrier Group: QBE European Operations

Insurer Names: Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
PN1700089
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
PN1600673
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
N17NA10020
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
PRPNA1701511

By:



Name:

Paul Casetta

Title:

Subrogation Attorney

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: RSUI INDEMNITY COMPANY

By: DAN DURBIN *Danial L. Durbin*

Name: DAN DURBIN

Title: CHIEF CLAIMS SPECIALIST

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Insurer

Carrier Group: SCOR

Insurer Names: General Security Indemnity Company of Arizona

By: 

Name: Paul Casetta

Title: Subrogation Attorney

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Insurer

Insurer Name: Mesa Underwriters Specialty Insurance Company

By: _____



Name: Ryan Wittrien

Title: Claims Property Subrogation Specialist

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Insurer

Insurer Name: Sentry Insurance a Mutual Company

By: *Cynthia D. Barnes*

Name: Cynthia D. Barnes

Title: Senior Subrogation Adjuster - Property

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SPCP Group, LLC



By:

Name:

Michael Gatto

Title:

Authorized Signatory

Subrogation Claims Holdings, LLC



By:

Name:

Michael Gatto

Title:

Authorized Signatory

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Insurer

Insurer Name:

Song Insurance OBD Endurance Insurance

By:

Richard [redacted]

Name:

Richard Koway

Title:

VP Property Claims

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Insurer

Carrier Group: Latitude Subrogation Services

Insurer Names: Star Insurance Company
United Specialty Insurance

By: 

Name: Paul Casetta

Title: Subrogation Attorney

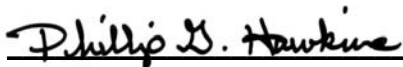
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Insurer

Insurer Name: State Farm County Mutual Insurance Company of Texas

By: 

Name: Phillip Hawkins

Title: Senior Vice President

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: State Farm Fire and Casualty Company

By: *Sue Murray* 6/5/2020

Name: Sue Murray

Title: VPO, P&C Claims

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Insurer

Insurer Name: State Farm General Insurance Company

By: _____

Name: Tom Conley

Title: Senior Vice President

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: State Farm Mutual Automobile Insurance Company

By: *Sue Murray* 6/5/2020

Name: Sue Murray

Title: VPO, P&C Claims

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Insurer

Insurer Name: Stillwater Insurance Group

By: 

Name: Mark Kleine

Title: Vice President of Claims

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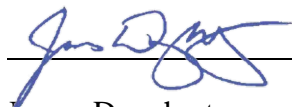
INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Camberwell Green LLC

By:



Name:

James Dougherty


Title:

Authorized Signatory

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INSURER ADOPTION AGREEMENT

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Insurer WESTPORT INSURANCE CORPORATION
Insurer Name: FIRST SPECIALTY INSURANCE CORPORATION
By: 
Name: WILLIAM J. ASHTON
Title: CLAIMS MANAGER, V.P.

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INSURER ADOPTION AGREEMENT

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Insurer

Carrier Group: Talbot Underwriting

Insurer Names: Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
B0429BA1704109
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
B0429BA1802148
Certain Underwriters at Lloyd's of London, UK Subscribing to Policy No.
PN1600673

By: 
Name: Paul Casetta
Title: Subrogation Attorney

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: TOKIO MARINE KILN SYNDICATES LIMITED

By: _____

Name: Nick Hutton-Penman Angela Gordon

Title: DCEO Deputy Company Secretary

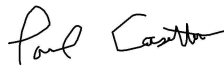
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Insurer

Insurer Name: Tokio Marine America Insurance Company

By: 

Name: Paul Casetta

Title: Subrogation Attorney


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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Tokio Marine HCC

By: 

Name: Christopher Downing

Title: Senior Marine and Energy Adjuster

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: TOPA INSURANCE COMPANY

By: Cynthia Maia

Cynthia Maia

Cynthia Maia

Digitally signed by Cynthia Maia
DN: C=US, OU=Claims, O=Topa Ins Co, CN=Cynthia Maia, E=cmaia@topa-ins.com
Reason: I am the author of this document.
Location: your signing location here
Date: 2020.05.20 15:17:17
Font: PhantomPDF Version: 9.7.0

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

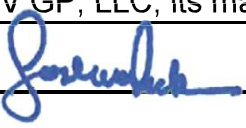
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Insurer

Insurer Name: TLFI INVESTMENTS B, LLC

By: REDSTONE OMJV GP, LLC, its managing member

Name: Joshua Peck 

Title: Vice President

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Names: The Travelers Indemnity Company and certain of its property
casualty affiliates, including Travelers Property Casualty Company of America,
Northfield Insurance Company, The Travelers Indemnity Company of Connecticut,
St. Paul Fire and Marine Insurance Company, Travelers Casualty Insurance Company of
America,
Travelers Commercial Insurance Company, The Standard Fire Insurance Company,
The Travelers Home and Marine Insurance Company, Fidelity and Guaranty
Insurance Underwriters, Inc., The Travelers Indemnity Company of America,
and Travelers Property Casualty Insurance Company

By: 

Name: James V. Somers

Title: Vice-President


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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: Tudor Insurance Company

By: 

Name: Brian T. Suth

Title: Attorney and Agent

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INSURER ADOPTION AGREEMENT

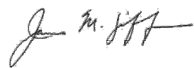
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Insurer

Insurer Name: United States Liability Insurance Company

By: James M. Ziff

Name:



Title: Vice President – Property Claims

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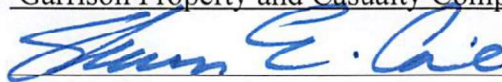
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Insurer

Insurer Name: Garrison Property and Casualty Company

By:



Name:

Shawn E. Caine

Title:

Authorized Attorney, Law Offices of Shawn E. Caine, A.P.C.

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as Exhibit A,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: USAA Casualty Insurance Company

By: 

Name: Shawn E. Caine

Title: Authorized Attorney, Law Offices of Shawn E. Caine, A.P.C.

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: USAA General Indemnity Company

By: 

Name: Shawn E. Caine

Title: Authorized Attorney, Law Offices of Shawn E. Caine, A.P.C.

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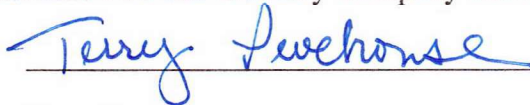
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Insurer

Insurer Name: Velocity Risk Underwriters, LLC (acting on behalf of United Specialty Insurance Company, Interstate Fire and Casualty Company and Certain Underwriters at Lloyd's)

By:



Name:

Terry Pevehouse

Title:

Subrogation Account Manager

Sedgwick | Delegated Authority

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Vibe Syndicate Management (As Lead Insurer)

By: /s/ Rob Pitt (electronic signature provided due to present lack of access to printer or scanner)

Name: Rob Pitt

Title: Claims Controller

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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as **Exhibit A**,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: Wawanesa General Insurance Company

By:  _____

Name: Philip Butera _____

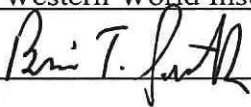
Title: Claims Manager _____

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INSURER ADOPTION AGREEMENT

The undersigned Insurer has read and understands the Mutual Made Whole Release attached hereto as Exhibit A,¹ and agrees to be bound by the terms thereof as to each Claimant that is the undersigned Insurer's (or its predecessor's) insured that signs the Mutual Made Whole Release upon, and only upon, the execution of such Mutual Made Whole Release and submission to the Fire Victim Trust by such Claimant following the Effective Date of the Debtors' Plan and the funding of the Subrogation Wildfire Trust with \$11 billion. For the avoidance of doubt, "Insurer" as used in the Mutual Made Whole Release shall include (without limitation) the California Insurance Guarantee Association.

Insurer

Insurer Name: Western World Insurance Company
By: 
Name: Brian T. Suth
Title: Attorney and Agent

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INSURER ADOPTION AGREEMENT

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Insurer

Carrier Group: XL Catlin

Insurer Name: Certain Underwriters at Lloyd's of London, UK and Insurers Subscribing to
Policy No. B06011530U16
Certain Underwriters at Lloyd's of London, UK and Insurers Subscribing to
Policy No. PTNAM1802878
Certain Underwriters at Lloyd's of London, UK and Insurers Subscribing to
Policy No. B115851701677
Certain Underwriters at Lloyd's of London, UK and Insurers Subscribing to
Policy No. ESF0224775

By:



Name:

Paul Casetta

Title:

Subrogation Attorney

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INSURER ADOPTION AGREEMENT

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Insurer

Insurer Name: Zenith Insurance Company

By: 

Name: DAVID C. PARK

Title: SENIOR VICE PRESIDENT AND DEPUTY GENERAL COUNSEL

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Insurer

Insurer Name: Zurich American Insurance Company

By: *Philip Boling* June 1, 2020

Name: Philip Boling

Title: Recovery Litigation Specialist

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Insurer

Insurer Name: Ascot Underwriting Ltd

By: 

Name: Olivia Bradley

Title: Claims Adjuster

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INSURER ADOPTION AGREEMENT

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Insurer:

Name: Banc of America Credit Products, Inc.,
as assignee of Metropolitan Property and Casualty Insurance Company

By:



Name: Seth Denson

Title: Director

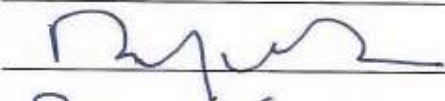
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upon, and only upon, the execution of such Mutual Made Whole Release and submission to the
Fire Victim Trust by such Claimant
funding of the Subrogation Wildfire Trust with \$11 billion.....
as used in the Mutual Made Whole Release shall include (without limitation) the California
Insurance Guarantee Association.

Insurer

Insurer Name: ARG Contact LLC

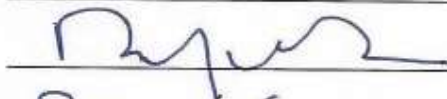
By:	
Name:	<u>Richard Grissinger</u>
Title:	<u>Sr. Managing Director</u>

¹ Capitalized terms used but not defined herein shall have the meanings given to them in the Mutual Made Whole Release.

INSURER ADOPTION AGREEMENT

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funding of the Subrogation Wildfire Trust with \$11 billion.....
as used in the Mutual Made Whole Release shall include (without limitation) the California
Insurance Guarantee Association.

By:



Name:

Richard Grissinger

Title:

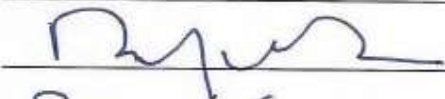
Sr. Managing Director

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funding of the Subrogation Wildfire Trust with \$11 billion.....
as used in the Mutual Made Whole Release shall include (without limitation) the California
Insurance Guarantee Association.

Insurer

Insurer Name: Centerbridge Special Credit Partners III LP

By: 
Name: Richard Grissinger
Title: Sr. Managing Director

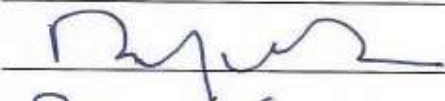
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funding of the Subrogation Wildfire Trust with \$11 billion.....
as used in the Mutual Made Whole Release shall include (without limitation) the California
Insurance Guarantee Association.

Insurer

Insurer Name: SSW Credit, L.L.C.

By: 
Name: Richard Grissinger
Title: Sr. Managing Director

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