

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

M. DIANE KOKEN,  
Insurance Commissioner of the  
Commonwealth of Pennsylvania,

Plaintiff,

v.

RELIANCE INSURANCE CO.,

Defendant.

No. 269 M.D. 2001

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COMMONWEALTH COURT  
OF PENNSYLVANIA

CERTIFICATION OF ROBERT HABERLE

Pursuant and subject to 18 Pa. C.S. § 4904, I, Robert Haberle, Acting President of Reliance Insurance Company (in Liquidation), do hereby certify and depose as follows:

1. Upon receipt of the Court's Case Management Order, dated February 8, 2002, I caused a search of both the paper and electronic policy and reinsurance files of Reliance Insurance Company (in Liquidation) ("Reliance") for the purpose of obtaining all policies of insurance, certificates of reinsurance, reinsurance contracts, reinsurance treaties, reinsurance policies, and/or endorsements, and the limits of each of the policies pertaining to United Church of Christ, Synagro Technologies, Inc., Consolidated Freightways, Inc., Vitas Healthcare Corporation, Brand Scaffold Services, Inc., and Brand Scaffold Builders, Inc., which relate to the claims or disputes filed in this action raised by these parties, including, but not limited to, the Joe A. Gonzalez claim(collectively, "Claimants").

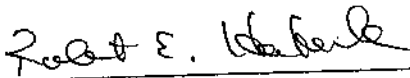
2. For documents that were in the possession of third parties, I further caused Reliance to demand from those certain third parties that all documents falling within the

scope of the Court's request with respect to the claims of Claimants be immediately produced to Reliance or Blank Rome Comisky & McCauley, as counsel for the Liquidator of Reliance, for production to the Court. I have personally, as have other senior managers of Reliance, contacted these third parties to demand their immediate compliance with our request for documents and have further impressed upon them that the document request is the subject of an Order of this Court.

3. Submitted to the Court on February 15, 2002 were all documents presently within the possession, care, custody or control of Reliance, and as supplied to Reliance by the third parties, which are responsive to the Court's request for documents, which relate to the claims of Claimants.

4. I further certify that I am not aware of any documents falling within the scope of the Court's request which have not been produced herewith.

5. I understand that this Certification is made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

  
ROBERT HABERLE

Dated: February 28, 2002