

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

*125 Broad Street
New York, NY 10004-2498*

LOS ANGELES • PALO ALTO • WASHINGTON, D.C.

FRANKFURT • LONDON • PARIS

BEIJING • HONG KONG • TOKYO

MELBOURNE • SYDNEY

August 13, 2015

2015 AUG 14 PM 1:50
RECEIVED
WISCONSIN COMMISSIONER
OF INSURANCE

By FedEx

Ms. Kristin Forsberg
Company Licensing Specialist, Bureau of Financial Analysis and Examinations
Office of Wisconsin Commissioner of Insurance
125 South Webster Street
Madison, Wisconsin 53703-3474

Re: Form A Statement Regarding the Acquisition of Control of
Pacific Indemnity Company ("Domestic Insurer") by ACE Limited

Dear Ms. Forsberg:

On behalf of ACE Limited and certain of its subsidiaries ("ACE" or the "Applicant"), enclosed please find one originally executed Statement Regarding Acquisition of Control of the Domestic Insurer pursuant to Chapter 40 of the Wisconsin Administrative Code (the "Application"). Also enclosed are two CD-ROM copies of the Application, one copy marked "**Public Copy**" and one marked "**Confidential Copy**." The Confidential Copy includes all of the exhibits to the Application, including the NAIC Biographical Affidavits (Exhibit 3) and the Business Plan and Three-Year Financial Projections (Exhibit 5), which are being provided separately to ensure confidential treatment of such information, as they contain personal information and trade secrets, as described below.

Please note that NAIC Biographical Affidavits are included for all of the individuals listed on Exhibit 3 to the Application other than for Mr. Robert William Scully, a Director of ACE, whose Biographical Affidavit will be submitted shortly.

The Applicant hereby requests that (i) the NAIC Biographical Affidavits and Business Plan and Three-Year Financial Projections exhibits be afforded confidential treatment, (ii) the Applicant and the Domestic Insurer be notified in advance of any proposed disclosure by the Department and (iii) the Applicant and the Domestic Insurer be given a reasonable opportunity to seek a protective order or take other action to prevent or limit any such disclosure. Exception from disclosure afforded under applicable law and all relevant protections thereunder is hereby claimed with respect to

Ms. Kristin Forsberg

-2-

the Business Plan and Three-Year Financial Projections, as such information constitutes, among other things, trade secrets and includes information that, if released, would cause substantial injury to the competitive position of ACE and the Domestic Insurer. In particular, but by no means limited thereto, such business plan and projections contain highly confidential and sensitive proprietary and commercial information and trade secrets of ACE and the Domestic Insurer that, if released, would cause substantial injury to the competitive position of the parties in the marketplace. The NAIC Biographical Affidavits contain personal information, the disclosure of which would constitute an unwarranted invasion of personal privacy.

Should you have any questions or comments concerning this filing, please do not hesitate to contact me at (212) 558-4751 or fettmanr@sullcrom.com. We look forward to working with the Department during its review process.

Very truly yours,


Robert M. Fettman

Enclosures