
**In the Matter of
Proposed Acquisition of Control of
Physicians Insurance Company of
Wisconsin, Inc., by
American Physicians Capital, Inc., and
American Physicians Assurance
Corporation (“Applicants”)**

PHYSICIANS INSURANCE COMPANY
OF WISCONSIN, INC.’S
INTERROGATORIES TO AMERICAN
PHYSICIANS CAPITAL, INC. AND
AMERICAN PHYSICIANS ASSURANCE
CORPORATION

Case No. 04-C29283

Petitioner Physicians Insurance Company of Wisconsin, Inc. hereby requests that respondents American Physicians Capital, Inc. and American Physicians Assurance Corporation answer each of the following interrogatories separately and fully, in writing and under oath, and serve a copy thereof upon counsel of record within twenty (20) days.

DEFINITIONS AND INSTRUCTIONS

The following definitions and instructions apply to all discovery requests:

1. **“ACAP”** means American Physicians Capital Inc., its parents, subsidiaries, affiliates, predecessors in interest, successors in interest, officers, directors, employees, agents, attorneys, and any person or entity acting or purporting to act on its behalf.
2. **“APA”** means American Physicians Assurance Corporation, its subsidiaries, affiliates, predecessors in interest, successors in interest, officers, directors, employees, agents, attorneys, and any person or entity acting or purporting to act on its behalf.
3. **“You”** and **“Your”** means ACAP and APA, as defined above.
4. **“PIC Wisconsin”** means Physicians Insurance Company of Wisconsin, Inc.

5. **“Form A”** means the Form A Statement Regarding the Acquisition of Control of Physicians Insurance Company of Wisconsin, Inc. submitted by APA to the Office of the Commission of Insurance on September 21, 2004, including all amendments thereto.

6. **“Selling Shareholders”** means those six current shareholders of PIC Wisconsin identified as “Selling Shareholders” in Form A.

7. **“Stock Purchase Agreement”** means that certain Stock Purchase Agreement identified in Form A.

8. **“Person”** is defined as any natural person or any business, legal or governmental entity or association.

9. **“Concerning”** means relating to, referring to, describing, evidencing or constituting.

10. **“Identify the basis”** means to describe in detail and with specificity each and every fact and to identify any and all documents that You contend support Your contention, argument, and/or position.

11. **And/or:** The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

12. **Number:** The use of the singular form of any word includes the plural and vice versa.

13. If you claim any form of privilege (whether based on a statute or otherwise) as a ground for not answering an interrogatory or any portion thereof, set forth in complete detail each and every fact upon which the privilege is based, including sufficient facts for the Commissioner to make a full determination whether the claim of privilege is valid.

14. To the extent that You consider any of the following interrogatories objectionable, provide as much information as You believe in good faith is not objectionable and is responsive to the particular interrogatory and then separately state that part of each interrogatory to which You object and the grounds for such objection.

15. These interrogatories shall be deemed continuing in nature so as to require supplemental answers if you obtain further information or documents after You respond to these interrogatories.

INTERROGATORIES

1. Identify all offers made by or on behalf of You to purchase PIC Wisconsin shares from January 1, 2002 through today, including the following information:

- a) The person who made the offer;
- b) The person to whom the offer was directed;
- c) The date on which the offer was made;
- d) The manner in which the offer was transmitted; and
- e) The response received to the offer.

2. Identify all offers made by or on behalf of PIC Wisconsin shareholders to sell PIC Wisconsin shares from January 1, 2002 through today, including the following information:

- a) The person who made the offer;
- b) The person to whom the offer was directed;
- c) The date on which the offer was made;
- d) The manner in which the offer was transmitted; and
- e) The response received to the offer.

3. Identify all financial or business advisors or consultants engaged by or on behalf of You in connection with the actual or potential acquisition of PIC Wisconsin stock since January 1, 2002, including a summary of any work or analyses performed.

4. Describe in detail any potential acquisitions in Wisconsin that have been considered by You since January 1, 2002.

5. Identify all communications between You and Edelman & Co., Ltd. or Robert Edelman, including but not limited to any efforts by Edelman to acquire or sell shares on behalf of any PIC Wisconsin shareholder since January 1, 2002.

6. Identify all communications You have sent or received concerning the Selling Shareholders, including but not limited to any correspondence between You (or anyone acting or purporting to act on its behalf), on the one hand, and the Selling Shareholders (or anyone acting or purporting to act on their behalf), on the other.

7. Identify all communications You have sent or received concerning any PIC Wisconsin shareholder other than the Selling Shareholders.

8. Identify all persons at APA or ACAP who gave or authorized press releases on Your behalf or gave or authorized interviews to newspapers, publications or other press in regard to Your interest in PIC Wisconsin or Your relationship or contact with the Selling Shareholders.

Dated this 8th day of June, 2005.

Respectfully submitted,

John S. Skilton/saw

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