



STATE OF WISCONSIN

2005 JUN -8 PM 3:28
BEFORE THE OFFICE OF THE COMMISSIONER OF INSURANCE

In the Matter of:

RECEIVED
WISCONSIN COMMISSIONER
OF INSURANCE
Proposed Acquisition of Control of
Physicians Insurance Company of Wisconsin, Inc., by
American Physicians Capital, Inc. and
American Physicians Assurance Corporation

Case No. 04-C29283

**APPLICANTS' REQUESTS FOR ADMISSIONS TO
PHYSICIANS INSURANCE COMPANY OF WISCONSIN**

Applicants, through their attorneys, hereby request that Physicians Insurance Company of Wisconsin ("PIC") respond to the following Requests for Admission, within such time as established by the Commissioner:

1. Admit that PIC was formed as a stock corporation under Wisconsin law.
2. Admit that the stock of PIC is transferable.
3. Admit that PIC was formed as a stock corporation so that the original investors in PIC could recover their investment if PIC became profitable.
4. Admit that PIC uses its stock for the purpose of compensating its officers and directors.
5. Admit that PIC has repurchased shares issued to officers and directors at book value.
6. Admit that as of the record date of the 2005 annual PIC shareholder meeting, more than fifty percent of PIC policyholders were not shareholders of PIC.
7. Admit that as of the record date of the 2005 annual PIC shareholder meeting, more than fifty percent of PIC policyholders were not residents of Wisconsin (i.e., have their primary place of business outside the State of Wisconsin).

8. Admit that as of the record date of the 2005 annual PIC shareholder meeting, more than fifty percent of PIC shares were held by non-policyholders of PIC.
9. Admit that PIC eliminated the requirement that policyholders must be shareholders.
10. Admit that PIC eliminated the requirement that shareholders must be residents of Wisconsin.
11. Admit that PIC and its Board of Directors owe fiduciary obligations to PIC shareholders.
12. Admit that the Applicants' proposed acquisition as described in the Form A (the "Acquisition") will not violate the law.
13. Admit that PIC will satisfy the requirements for the issuance of a license to write the line or lines of insurance for which it is presently licensed if the Acquisition is approved.
14. Admit that the Acquisition will not create a monopoly for professional liability insurance in the State of Wisconsin.
15. Admit that the Acquisition will not substantially less competition for professional liability insurance in the State of Wisconsin.
16. Admit that the Acquisition will not jeopardize the financial stability of PIC.
17. Admit that the Applicants have no plan or proposal to make a material change in the business, corporate structure, or management of PIC.
18. Admit that the Selling Shareholders in this proceeding collectively do not possess the direct or indirect power to direct or cause the direction of the management and policies of PIC.

Respectfully submitted:

David J. Hanson
Michael Best & Freidrich LLP
One South Pickney Street
Madison, WI 53701-1806

Lori McAllister
Dykema Gossett PLLC
124 W. Allegan, Suite 800
Lansing, MI 48933