UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

X In re: Chapter 15 Petition of PRO Insurance Solutions Limited, as Case No. 10-15358 (JMP) foreign representative of BALOISE INSURANCE LTD., CITY INTERNATIONAL INSURANCE (Jointly Administered) COMPANY LIMITED, DOWA INSURANCE COMPANY (EUROPE) LIMITED, EAST WEST INSURANCE COMPANY LIMITED, FUJI INTERNATIONAL INSURANCE COMPANY LIMITED, HISCOX INSURANCE COMPANY LIMITED, KX REINSURANCE COMPANY LIMITED, METROPOLITAN REINSURANCE COMPANY (U.K.) LIMITED, MOORGATE INSURANCE COMPANY LIMITED, NIPPON INSURANCE COMPANY OF EUROPE LIMITED, POLYGON INSURANCE COMPANY LIMITED. SWISS RE INTERNATIONAL SE, UK BRANCH, AND TOWER INSURANCE LIMITED Debtors in a Foreign Proceeding.

NOTICE OF FILING AND HEARING ON PETITIONS SEEKING RECOGNITION OF FOREIGN PROCEEDING PURSUANT TO CHAPTER 15 OF THE UNITED STATES BANKRUPTCY CODE

PLEASE TAKE NOTICE that on October 15, 2010 PRO Insurance Solutions Limited, the designated foreign representative (the "Petitioner") of the above-captioned debtors (together, the "Petitioning Companies") in schemes of arrangement (the "Schemes") and associated proceedings under part 26 of the English Companies Act 2006 (the "English Proceedings") before the High Court of Justice of England and Wales filed petitions (the "Chapter 15 Petitions") in the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court") under chapter 15 of title 11 of the United States Code commencing cases (the "Chapter 15 Cases") ancillary to the English Proceedings and seeking recognition of such foreign proceedings as "foreign main proceedings," or in the alternative as "foreign non-main proceedings," and relief in aid thereof;

PLEASE TAKE FURTHER NOTICE that the Petitioner seeks, among other things, entry of an order giving full force and effect in the United States to the Schemes, a permanent injunction, and related relief;

PLEASE TAKE FURTHER NOTICE that by Order dated October 21, 2010, the Chapter 15 Cases are being jointly administered for procedural purposes only and all pleadings filed in the Chapter 15 Cases should bear the above-referenced caption;

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to submit a response or objection to the Chapter 15 Petitions must do so pursuant to the Bankruptcy Code and the Local and Federal Rules of Bankruptcy Procedure. Such response or objection must be made in writing describing the basis therefore and filed with the Bankruptcy Court electronically in accordance with General Order M-399 by

registered users of the Court's electronic case filing system, and by all other parties in interest, on a 3.5 inch disc, preferably in Portable Document Format (PDF), Word Perfect or any other Windows-based word processing format, with a hard copy to the Chambers of the Honorable James M. Peck, United States Bankruptcy Judge, and served upon the counsel for the Petitioner so as to be received by them no later than **November 15, 2010** at **5:00 p.m.** (ET). Notices to counsel for the Petitioner should be addressed to Allen & Overy LLP, 1221 Avenue of the Americas, New York, NY 10020, Attention: Ken Coleman and Stephen Doody;

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court has scheduled a hearing on **November23, 2010 at 10:00 a.m. (ET)** (the "**Recognition Hearing**") before the Honorable James M. Peck in Courtroom 601 of the Bankruptcy Court, One Bowling Green, New York, New York 10004-1408 to consider the Chapter 15 Petitions and any responses or objections thereto.

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Bankruptcy Court may grant the recognition and relief requested by the Petitioner without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that the Recognition Hearing may be adjourned from time to time without further notice other than an announcement in open court at the Recognition Hearing of the adjourned date or dates or any further adjourned hearing.

PLEASE TAKE FURTHER NOTICE that the details regarding the filing and processing of claims are set forth in the Schemes, and no claims should be filed in these Chapter 15 Cases.

Copies of the Chapter 15 Petitions, the Scheme Documents, and other filings in this case are available (1) on the Bankruptcy Court's Electronic Case Filing System, which can be accessed from the Bankruptcy Court's website at https://ecf.nysb.uscourts.gov/ (a PACER login and a password are required to retrieve a document), (2) at the Petitioner's website, www.englishandamericanpools.com, and/or (3) upon written request to the Petitioner's counsel addressed to:

Allen & Overy LLP 1221 Avenue of the Americas New York, New York 10020 Telephone (212) 610-6300 Facsimile (212) 610-6399 Attention: Jonathan Cho jonathan.cho@allenovery.com

Dated: New York, New York October 26, 2010

ALLEN & OVERY LLP

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