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Corporate & Financial Regulation

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APR 24 2013

April 24, 2013

Mr. Robert E. Brackbill  
Chief, Company Licensing Division  
Commonwealth of Pennsylvania  
Insurance Department  
Office of Regulation of Companies  
1345 Strawberry Square  
Harrisburg, PA 17120

Pennsylvania  
Insurance Department

Re: Petition to Intervene in the Proposed Acquisition of  
Multiple OneBeacon Insurance Group Entities by  
Armour Group Holdings Limited

Dear Mr. Brackbill:

We represent Colgate-Palmolive Company ("Colgate") concerning insurance issues. We write concerning the Form A Statement Regarding the Acquisition of Control of a Domestic Insurer filed with the Insurance Department by Armour Group Holdings Limited ("Armour") and OneBeacon Insurance Group LLC ("OneBeacon") on February 7, 2013 (the "Proposed Acquisition").

Pursuant to the Pennsylvania Administrative Code, 1 Pa. Code §§ 35.27 *et seq.*, and the Pennsylvania Insurance Holding Company Act, 40 P.S. §§ 991.1401 *et seq.*, enclosed herewith is Colgate's Petition to Intervene in the Proposed Acquisition (the "Petition"). For the reasons set forth in the Petition, Colgate respectfully requests the following relief:

- Permission to review the documents filed in support of the Proposed Acquisition for which Armour and OneBeacon seek confidential treatment;
- Permission to participate in a hearing regarding the validity of the Proposed Acquisition pursuant to 1 Pa. Code §§ 35.101 *et seq.*;
- Permission to file comments with the Insurance Department concerning the Proposed Acquisition prior to the Insurance Department's consideration of whether to approve it;

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- Stays of any deadlines relevant to the Proposed Acquisition pending a decision on the Petition; and
- Any other relief the Insurance Department may deem appropriate.

Colgate respectfully requests confidential treatment of the Petition as against any entities or individuals not parties to the Proposed Acquisition and the opportunity to oppose any disclosure of the Petition.

Do not hesitate to contact me if you have any questions concerning this correspondence.

Respectfully submitted,

  
Pamela Hans

Enclosure

cc: Mr. Steven L. Yerger (*via electronic mail*)  
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