

EXPERT REPORT - EXHIBIT A -- CURRICULUM VITAE

Peter J. Hildebrand, JD & CPCU

690 Americas Cup Cove, Alpharetta, GA 30005

(770) 772-7443 (office) or (404) 384-0716 (cell) or (770) 579-7691(fax)

Internet: pjhildebrand@bellsouth.net

EIN# 20-4114769

Overview: As president of Peter Hildebrand, LLC, Mr. Hildebrand relies on more than 25 years of insurance, reinsurance, management and legal experience to provide consulting services throughout the United States. As both an attorney and a CPCU, Mr. Hildebrand provides a unique blend of professional background that can be applied to a myriad of insurance and reinsurance matters. Mr. Hildebrand is licensed as an Insurance Counselor in the State of Georgia and maintains his license to practice law in the State of Wisconsin. Mr. Hildebrand qualifies as an expert in insurance coverage, claims handling, claims management, dispute resolution, employment/regulatory issues and a wide variety of other legal and insurance related fields. Mr. Hildebrand has extensive experience in handling reinsurance matters including dispute resolution, commutations, audits and contract interpretation and has been appointed as an arbitrator or expert in various reinsurance arbitrations. Mr. Hildebrand also has extensive experience in the handling of claims involving issues related to good faith and fair dealing, unfair claim settlement practice violations, and fair trade practice insurance regulations. He has consulted on cases throughout the United States and testified over forty times either in deposition or trial for both Insurers and Policyholders in the past four years.

EXPERIENCE

12-05 TO PRESENT: PETER HILDEBRAND, LLC – ATLANTA, GA

- Insurance and reinsurance consultant providing expert opinions on industry custom and practice for handling insurance claims for nearly all lines of business, insurance coverage, good faith claim handling, unfair claim settlement practice violations, claims administration and procedures, reinsurance contract interpretation and claims handling, insurance industry employment practices, fee bill review and other related insurance issues.
- Mediator and Arbitrator of disputes involving coverage, claim handling, reinsurance, employment, fee mediation and all sorts of tort litigation.
- Claims evaluation in cases of significant complexity or severity for nearly all lines of business including environmental and construction defect matters.
- Auditor of insurance or reinsurance claims, claims handling practices, claims administration, attorney fee bills and financial transactions.

- Drafting and implementing specialized claim handling programs and procedures for insurers, claim handling companies and self insured corporations
- Review and consultation on insurance agency, broker and underwriting issues and projects.

6-99 TO 12-05: AMERICAN SAFETY INSURANCE SERVICES (ASIS) – ATLANTA, GA

VICE PRESIDENT – CLAIMS LEGAL DEPT (02-04 TO 12-05)

- Established a new department that specialized in addressing the largest most complicated Environmental and E&S claims within the company.
- Directly managed all multi-million dollar cases with numerous defense verdicts and favorable settlements.
- Managed or directed all claims in litigation involving allegations of a breach of the duty of good faith and fair dealing or similar allegations.
- Handled all reinsurance reporting, audits and dispute resolution.
- Supervised all ceded reinsurance claims and saved the company several million dollars through my coverage analysis and interpretation.
- Drafted complex coverage opinions and letters based upon interpretation of commercial lines policies, manuscript policies and endorsements.
- Managed outside panel counsel including the implementation of our Outside Counsel Monitoring and Litigation Management Programs.
- Spearheaded the identification of a state of the art automated litigation management program and directed the implementation team.
- Provided claims and coverage training to company personnel and TPA claims personnel and provided legal advice to units outside of Claims.

VICE PRESIDENT – CLAIMS DEPT (06-99 TO 02-04)

- Built the ASIS Claims area to a full service Claims Department as the company grew from \$30MM to \$250MM in premium.
- Managed all aspects of the claims function for ASIS including supervision of the Claims Department and the claims quality and contract compliance of outsourced claims being handled by Third Party Administrators (TPA's).
- Led multiple teams to complete revision of our Environmental and E&S coverage forms and endorsements including the drafting of manuscript exclusionary endorsements relating to Y2K, mold, total prior works, and Montrose continuing occurrence language.
- Made presentations at the Environmental Institute on state-of-the art issues related environmental claims handling such as mold related claims and litigation.
- Guided the Claims Dept implementation of Genius, Heron (Surety System) and Apollo (WC System).
- Managed the audit and control of our Program partners and their TPA's, including such lines of business as legal professional, construction; taxi cab liability; pest control; various WC Programs including PEO business, and NY General Liability and Labor Law programs.

- Assumed and personally resolved book transfers on claims involving personal auto, AD&D, construction defect and environmental claims.
- Completed claims due diligence on several corporate acquisitions including evaluation of claims handling and reserves.
- Selected by the Executive Board to head the Technical Services team which accomplished implementation of the following: Corporate Disaster Recovery Plan; New Employee Orientation Program; Performance Management Program; Streamlining corporate methods and procedures; and Corporate Training Program.
- Originated and led the Claims-Underwriting-Loss Control monthly meetings to review claims and loss control issues and assess renewals.
- Personally handled or supervised all claims of major exposure or complexity, both primary and excess, as well as claims involving alleged bad faith.

6-96 TO 6-99 VESTA-SHELBY INSURANCE COMPANIES – BIRMINGHAM, AL

VICE-PRESIDENT OF CLAIMS/REGULATORY & COMPLIANCE

- Managed two departments for a company that grew from \$350MM to nearly \$900MM in premium before it experienced financial problems.
- Personally handled or supervised all claims of major exposure or complexity, both personal lines and commercial lines.
- Managed all claims in litigation involving allegations of a breach of the duty of good faith and fair dealing or similar allegations.
- Cost effectively reengineered the Vesta Claims Department
- Implemented quality control standards and performed audits for MGA's handling non-standard auto claims through Vesta's County Mutual in Texas.
- Consolidated the Shelby Claims Department of 256 employees into Vesta Claims achieving efficiencies of scale.
- Personally directed the consolidation of Shelby WC claims into Vesta claims and supervised the newly WC claims unit.
- Implemented significant Cost Savings Measures to the combined operations maintaining claims quality while eliminating six offices
- Redesigned the entire Regulatory Department and brought company into compliance in both personal and commercial lines filings.
- Handled resolution of numerous reinsurance claims and participated in the commutation of several treaties with economically troubled reinsurers.

12-86 to 6-96 GREAT AMERICAN INSURANCE COMPANY- Cincinnati, OH

10-90 to 6-96 Regional Claims Vice President – Raleigh, NC

- Managed all the offices in the Mid-Atlantic, Southeast & Texas regions.
- Realigned claims personnel resulting in exceptional goal performance in all offices.
- Spearheaded the reorganization of offices after the company divisionalized.

- Personally handled or supervised all claims of major exposure or complexity, both primary and excess.
- The Raleigh claims operation was twice recognized as the best claims office in the Division.
- Recognized personally with the highest claims management award in the Commercial Division - The Claims MVP
- Developed technical materials for the handling of claims generated by our Optometry Professional Liability Program

12-86 to 10-90 Assistant Vice President – Home Office Liability Claims

- Directed the CAO Liability Staff with responsibility for all major claims litigation and reinsurance reporting.
- Managed the supervision of all umbrella and excess claims at GAI, as well as all claims involving alleged bad faith and unfair claim practice violations.
- Personally handled or supervised all claims of major exposure or complexity, both primary and excess.
- Handled and resolved all major reinsurance disputes with our over 100 reinsurers.
- Organized the consolidation of environmental claims into a specialized home office unit.
- Designed and implemented the programs for litigation management, structured settlements and ADR on a companywide basis.
- Developed and implemented an audit program for House Counsel Office operations.
- Implemented the Outside Counsel Monitoring Program and the Fee Bill Review Program.

9-76 to 12-86 Milwaukee Insurance Company – Milwaukee, WI

1/82 to 12/86 Vice President and General Counsel

- Responsible for all claims litigation and claim legal matters, as well as reporting to our reinsurers.
- Supervised staff attorneys responsible for claims litigation, workers compensation hearings, and arbitrations.
- Established and managed MIC's house counsel operation.
- Personally supervised or handled extra-contractual matters involving alleged violation of the duty of good faith and fair dealing.
- Managed all subrogation and collection matters for the company.
- Implemented claim standards and procedures for Milwaukee Safeguard, the non-standard auto subsidiary.
- Advised human resources department on employee matters and ultimately assumed responsibility for all corporate legal matters.
- Participated on the life insurance committee, investment committee and pension committee and provided advice to same.
- Provided advice to Milwaukee Life on contract and coverage matters and participated in handling claims under their life products.

- Corporate representative to the Wisconsin Insurance Alliance and the Conference of Mutual Casualty Companies.

9/76 to 1/82 Assistant General Counsel/Associate Counsel

- Responsible for the supervision of litigation on cases pending nationwide, including coverage analysis, investigation, defense, settlement evaluation and ultimate resolution of all assigned matters.
- Responsible for the assignment of defense and working with defense counsel on litigated claims.
- Performed defense work including discovery and trial work on cases in Southeastern Wisconsin.
- Performed defense work on workers compensation claims and attended hearings throughout the State of Wisconsin.
- Prepared filings and responses for Inter-company Arbitration and served on the local arbitration panels.
- Handled collection of subrogation against other insurance companies and uninsured drivers including filing collection suits.
- Provided coverage advice and/or legal opinions to claim handlers on non-litigated claims.

1/75 to 9/76 Trial Attorney – Private Practice of Law

EDUCATION;

UNIVERSITY OF WISCONSIN – MADISON

B.A. Degree – Economics (Honors Program)

Phi Beta Kappa, Phi Kappa Phi, Phi Eta Sigma, Evans Scholar, Rhodes Scholar Nominee

UNIVERSITY OF WISCONSIN LAW SCHOOL – MADISON

J.D. Degree – Admitted to Wisconsin State Bar; Eastern/Western Federal District Courts, Appellate Advocacy, Legal Aid Society, Evans Law Scholarship, Law Clerk

INSURANCE COURSES/ ACTIVITIES:

State of Georgia – Licensed Insurance Counselor for Property and Casualty Insurance.

CPCU – Chartered Property & Casualty Underwriter - Designation in 1988; CIC Property; Taught Insurance Law – CPCU 6; North Carolina Claims Adjuster License (Early 1990's)

Current Memberships: The Society of Risk Management Consultants(SRMC); Defense Research Institute (DRI); DRI Lawyers Professionalism & Ethics Committee; American Bar Association (ABA); ABA Torts, Trial and Insurance Section; ABA Dispute Resolution Section; American

Association of Justice (AAJ); AIDA Reinsurance and Insurance Arbitration Society (ARIAS); Chartered Property & Casualty Underwriters Society (CPCU); Atlanta Claims Association (ACA); Phi Beta Kappa Society

Activities: SRMC Professional Practices Committee Chairman; NAIC & IRES Meetings; NC Defense Counsel Arbitration Panelist; Wisconsin Insurance Alliance (Delegate); National Association of Mutual Insurance Companies (NAMIC); Conference of Mutual Casualty Insurance Companies; West Coast Casualty Construction Defect Seminars; Insurance Summit; Environmental Institute (Insurance Instructor); Southeast Claims Executives Association (Board of Directors); Crawford University (Guest Instructor); Cooper & Scully Bad Faith Seminar (presenter); ABA Surety Meeting (NYC); American Optometric Association Annual Conference (Presenter); ARIAS Arbitration Workshops; DRI Insurance Bad Faith Seminar; SRMC 2008 - 2012 Spring and/or Fall Meetings; CPCU – Central Chapter of Indiana – 2010 Annual Ethics Presentation (Presenter); Leitner Williams Insurance Seminar (Presenter) and a multitude of DRI, ACA & other continuing claims and legal education presentations.

Publications: REINSURANCE BASICS FOR THE CLAIMS PROFESSIONAL RELATIVE TO BAD FAITH CLAIMS (2006)