

JUN 18 2018

Jorge Navarrete Clerk

Deputy

Case No. S244737

**IN THE SUPREME COURT
OF THE STATE OF CALIFORNIA**

MONTROSE CHEMICAL CORPORATION OF CALIFORNIA,

Petitioner,

v.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA,
COUNTY OF LOS ANGELES,**

Respondent.

and

CANADIAN UNIVERSAL INSURANCE COMPANY, INC. ET AL.,

Real Parties in Interest.

After a Decision by the Court of Appeal
Second Appellate District, Division Three, Civil Case No. B272387
Los Angeles County Superior Court Case No. BC 005158
Honorable Elihu Berle, Judge Presiding

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CERTIFICATE OF INTERESTED ENTITIES OR PERSONS

Pursuant to California Rules of Court, Rule 8.488, the undersigned counsel for Real Parties in Interest, AIU INSURANCE COMPANY, AMERICAN HOME ASSURANCE COMPANY, GRANITE STATE INSURANCE COMPANY, LANDMARK INSURANCE COMPANY, LEXINGTON INSURANCE COMPANY, NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, and NEW HAMPSHIRE INSURANCE COMPANY (the “AIG COMPANIES”) certify as follows:

AIU INSURANCE COMPANY is a direct, wholly-owned (100%) subsidiary of AIG Property Casualty U.S., Inc., which is a wholly-owned (100%) subsidiary of AIG Property Casualty Inc., which is a wholly-owned (100%) subsidiary of AIUH LLC, which is a wholly-owned (100%) subsidiary of American International Group, Inc., which is a publicly-held corporation. No parent entity or publicly held entity owns 10% or more of the stock of American International Group, Inc.

AMERICAN HOME ASSURANCE COMPANY is a direct, wholly-owned (100%) subsidiary of AIG Property Casualty U.S., Inc., which is a wholly-owned (100%) subsidiary of AIG Property Casualty Inc., which is a wholly-owned (100%) subsidiary of AIUH LLC, which is a wholly-owned (100%) subsidiary of American International Group, Inc., which is a publicly-held corporation. No parent entity or publicly held entity owns 10% or more of the stock of American International Group, Inc.

GRANITE STATE INSURANCE COMPANY is a direct, wholly-owned (100%) subsidiary of AIG Property Casualty U.S., Inc., which is a wholly-owned (100%) subsidiary of AIG Property Casualty Inc., which is a wholly-owned (100%) subsidiary of AIUH LLC, which is a wholly-owned (100%) subsidiary of American International Group, Inc., which is a publicly-held corporation. No parent entity or publicly held entity owns 10% or more of the stock of American International Group, Inc.

LANDMARK INSURANCE COMPANY is the predecessor-in-interest to National Union Fire Insurance Company of Pittsburgh, PA, which is a direct, wholly-owned (100%) subsidiary of AIG Property Casualty U.S., Inc., which is a wholly-owned (100%) subsidiary of AIG Property Casualty Inc., which is a wholly-owned (100%) subsidiary of AIUH LLC, which is a wholly-owned (100%) subsidiary of American International Group, Inc., which is a publicly-held corporation. No parent entity or publicly held entity owns 10% or more of the stock of American International Group, Inc.

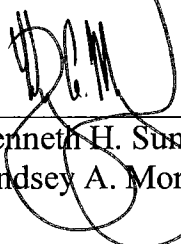
LXINGTON INSURANCE COMPANY is a direct, wholly-owned (100%) subsidiary of AIG Property Casualty U.S., Inc., which is a wholly-owned (100%) subsidiary of AIG Property Casualty Inc., which is a wholly-owned (100%) subsidiary of AIUH LLC, which is a wholly-owned (100%) subsidiary of American International Group, Inc., which is a publicly-held corporation. No parent entity or publicly held entity owns 10% or more of the stock of American International Group, Inc.

NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA is a direct, wholly-owned (100%) subsidiary of AIG Property Casualty U.S., Inc., which is a wholly-owned (100%) subsidiary of AIG Property Casualty Inc., which is a wholly-owned (100%) subsidiary of AIUH LLC, which is a wholly-owned (100%) subsidiary of American International Group, Inc., which is a publicly-held corporation. No parent entity or publicly held entity owns 10% or more of the stock of American International Group, Inc.

NEW HAMPSHIRE INSURANCE COMPANY is a direct, wholly-owned (100%) subsidiary of AIG Property Casualty U.S., Inc., which is a wholly-owned (100%) subsidiary of AIG Property Casualty Inc., which is a wholly-owned (100%) subsidiary of AIUH LLC, which is a wholly-owned (100%) subsidiary of American International Group, Inc., which is a publicly-held corporation. No parent entity or publicly held entity owns 10% or more of the stock of American International Group, Inc.

The AIG COMPANIES know of no other entity or person who has a financial interest or other interest in the outcome of this matter.

Executed this 18th day of June, 2018 in Emeryville, California.



Kenneth H. Sumner
Lindsey A. Morgan

JOINDER IN ANSWERING BRIEF ON THE MERITS BY AIG INSURERS

Real Parties in Interest AIU Insurance Company, American Home Assurance Company, Granite State Insurance Company, Landmark Insurance Company, Lexington Insurance Company, National Union Fire Insurance Company of Pittsburgh, PA, and New Hampshire Insurance Company (the “AIG Insurers”) join in the Answering Brief on the Merits (“Brief”) filed by the Real Party in Interest excess insurers, but specifically decline to join in the Brief’s characterization of individual contracts of insurance as an “uber-policy,” a characterization which occurs through the Brief and in section III(B).

DATED: June 18, 2018

SINNOTT, PUEBLA, CAMPAGNE &
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CERTIFICATE OF WORD COUNT

(Cal. Rules of Court, Rule 8.204(c)(1), 8.486(a)(6))

The text of this joinder consists of 93 words as counted by the Microsoft Word word-processing program used to generate the joinder.

DATED: June 18, 2018

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Alameda, State of California. My business address is 2000 Powell Street, Suite 830, Emeryville, CA 94608.

On June 18, 2018, I served true copies of the following document described as **JOINDER TO ANSWERING BRIEF ON THE MERITS** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY ELECTRONIC SERVICE: I caused the document or documents to be electronically transmitted to TrueFiling, an electronic filing service provider, pursuant to the order authorizing electronic service and the instructions on that website.

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BY OVERNIGHT DELIVERY: On the above-mentioned date, I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses shown above. I placed the envelope or package for collection and overnight

delivery at an office or a regularly utilized drop box of the overnight delivery carrier with delivery fees paid or provided for.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 18, 2018, at Los Angeles, California.

Denise C. Brown
Denise Brown

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