

CONFIDENTIAL

November 29, 2018

HAND DELIVERED

Amy Malm, Director
Bureau of Financial Analysis and Examinations
Office of Commissioner of Insurance
P O Box 7873
Madison WI 53707-7873

- Re: Request for Approval of the:
1. Merger of Wilmington Insurance Company into National Insurance Company of Wisconsin
 2. Name Change of Merged Entity
 3. Redomestication of Merged Entity to Delaware
 4. Amendment of NICW's Wisconsin License

Dear Ms. Malm:

We have filed with the Wisconsin Office of the Commissioner of Insurance ("OCI") under separate cover a paper and an electronic copy of a Form A Statement Regarding the Acquisition of Control of a Domestic Insurer in connection with the proposed merger of Wilmington Insurance Company ("WIC") into National Insurance Company of Wisconsin ("NICW") including a pre-merger \$5.5 million dividend from NICW to National Services, Inc., the name change of the resulting merged entity from National Insurance Company of Wisconsin to Wilmington Insurance Company, the redomestication of the merged entity to Delaware and the issuance of a Wisconsin Certificate of Authority to the merged entity as a foreign property and casualty insurance company in Wisconsin. The Form A filing included all exhibits and information for which WIC is not seeking confidential treatment. Enclosed and listed below are the exhibits and information for which WIC is seeking confidential treatment pursuant to authority set forth in the cover letter which accompanied the Form A filing:

1. Biographical Affidavits for certain proposed directors and officers.
2. Plan of Operations for the combined company.

3. Financial Pro Forma.
4. Gearson Partners Holdings, LP financial statements and Agreement of Limited Partnership. Gearson Partners Holdings, LP is a privately held entity whose financial statements and agreements are not public record.

The above exhibits and information should be maintained as confidential and not be made available for public inspection or copying. We request that the OCI provide written notification of any request for access to the exhibits or information and advance written notification of release of any exhibit or information due to a determination by the OCI that it should not be accorded confidential treatment. Any communications relating to such a request or determination should be directed to David N. Gearhart, Wilmington Holdings Corporation, 1403 Silverside Road, Suite 3B, Wilmington, DE 19810, david@wilmingtonholdings.com, telephone number (404) 558-1192.

Thank you for your consideration of this Form A filing and WIC's request for confidentiality.

Please contact me should you have any questions or require additional information.

Sincerely,

PARRETT & O'CONNELL, LLP



Noreen J. Parrett

Enclosures

cc: David Gearhart, Wilmington Insurance Company (w/encls.)
David Norton, National Services, Inc. (w/encls.)