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**FEDERAL INSURANCE COMPANY'S REQUEST FOR ORAL ARGUMENT**

Appellee Federal Insurance Company respectfully requests that this Court grant oral argument pursuant to S. Ct. Prac. R. 9.2 on the merits of its motion for reconsideration. Oral argument is appropriate and may be ordered, for example, where a decision of this Court appears to set a new standard of law and confusion and misunderstanding ensues. *State ex rel. Gross v. Indus. Comm.* 115 Ohio St.3d 249, 2007-Ohio-4916, ¶2.

The instant case involves this Court's deciding a significant issue which has gained national attention and apparently changed the applicable standard of contract interpretation to favor third-parties over the intentions of the parties to the contract, i.e., the policyholder. As a result, confusion and misunderstanding are likely.

The specific reasons supporting reconsideration and oral argument are set forth in more detail in Appellee Federal Insurance Company's Memorandum in Support of Reconsideration, filed contemporaneously with this Motion and incorporated herein.

Respectfully submitted,



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CERTIFICATE OF SERVICE

On this 6 day of January, 2011 copies of the foregoing were sent by regular U.S. Mail,

postage prepaid, to:

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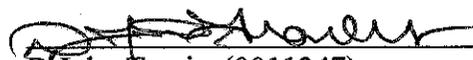
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