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IN THE SUPREME COURT OF THE STATE OF DELAWARE

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IN RE VERIZON INSURANCE COVERAGE APPEALS No. 558, 2018 No. 560, 2018 No. 561, 2018 Court below: Superior Court of the State of Delaware C.A. No. N14C-06-048 WCC (CCLD)

REPLY BRIEF OF APPELLANT U.S. SPECIALTY INSURANCE COMPANY

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April 5, 2019

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INTRODUCTION

Defendant-Appellant U.S. Specialty Insurance Company ("U.S. Specialty"), which is not a party to the Cross Appeal filed in the above-captioned consolidated appeals, files this Reply in support of its appeal of the Superior Court's ruling that the *U.S. Bank* Action is a Securities Claim as defined in the Idearc Runoff Policy.

U.S. Specialty adopts and incorporates by reference the Introduction from Appellants Illinois National Insurance Co. and National Union Fire Insurance Co. of Pittsburgh, Pa.'s Reply Brief on Appeal and Answering Brief on Cross-Appeal, filed on April 5, 2019 (the "Illinois National Reply Brief"), except to the extent it addresses the cross appeal, to which U.S. Specialty is not a party.

ARGUMENT

U.S. Specialty adopts and incorporates by reference Section I of the Argument from the Illinois National Reply Brief filed on April 5, 2019.

CONCLUSION

The Superior Court's ruling that the U.S. Bank Action is a Securities Claim

as defined in the Idearc Runoff Policy should be reversed.

Respectfully submitted,

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