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March 2, 2011

Via Hand Delivery

Clerk's Office
Supreme Judicial Court
John Adams Courthouse
One Pemberton Square, Suite 2500
Boston, MA 02108

Re: Marcia Rhodes, et al. v. AIG Domestic Claims, Inc., et al
Supreme Judicial Court No.: SJC-10911

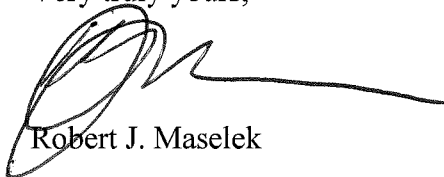
Dear Sir/Madam:

Enclosed for filing in the above-referenced matter please find:

- Application of the Defendant-Appellee AIG Domestic Claims, Inc. Pursuant to Mass. R. App. P. 27.1(f) for Permission to File New Brief.

Thank you for your assistance.

Very truly yours,



Robert J. Maselek

RJM/ml

Enc.

cc: All Counsel of Record (*via first class mail and email*)

SUPREME JUDICIAL COURT
FOR THE COMMONWEALTH OF MASSACHUSETTS

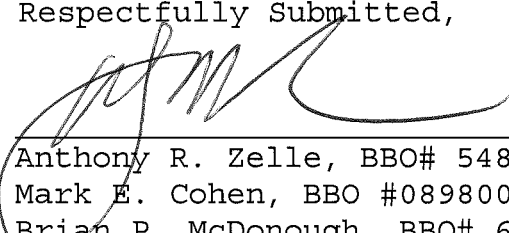
MARCIA RHODES, HAROLD RHODES,)	
and REBECCA RHODES,)	
Plaintiffs,)	
)	
v.)	No. SJC-10911
)	
AIG DOMESTIC CLAIMS, INC. f/k/a AIG)	
TECHNICAL SERVICES, INC., NATIONAL)	
UNION FIRE INSURANCE COMPANY OF)	
PITTSBURGH, PA., and ZURICH AMERICAN)	
INSURANCE COMPANY,)	
Defendants.)	

APPLICATION OF THE DEFENDANT-APPELLEE
AIG DOMESTIC CLAIMS, INC. PURSUANT TO MASS. R. APP. P. 27.1(f)
FOR PERMISSION TO FILE NEW BRIEF

Defendant-Appellee, AIG Domestic Claims, Inc. f/k/a AIG Technical Services, Inc., National Union Fire Insurance Company of Pittsburgh, PA ("AIG"), pursuant to Mass. R. App. P. 27.1(f), respectfully requests permission to file a new brief in this Court in lieu of the brief it filed in the Appeals Court. AIG submits that a new brief will permit AIG to include in its brief arguments that address the opinion issued by the Appeals Court. AIG therefore requests that this Court, pursuant to Mass. R. App. P. 27.1(f), permit it to file a fifty-page brief with this Court. If Appellants request, and this Court grants, permission to Appellants to file a new brief, AIG requests that this Court set a date for Appellants to file their brief, followed by a date for AIG to file its brief. If Appellants do not seek

permission to file a new brief, AIG requests that this Court set a date in May of 2011 for AIG to file its brief.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

I, Robert J. Maselek, certify that on this 2nd day of March, 2011, I caused a copy of the foregoing to be served by electronic and regular mail delivery upon the following:

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Robert J. Maselek