

APPENDIX

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Hyatt Legal Plans

A MetLife Company

Andrew Kohn
General Counsel
Vice President Operations

RECEIVED

MAR 18 2004

BOARD OF PROFESSIONAL RESPONSIBILITY
SUPREME COURT OF TENNESSEE

March 16, 2004

Lance B. Bracy
Chief Disciplinary Counsel
Board of Professional Responsibility of the Supreme Court of Tennessee
110 Kermit Drive, Suite 730
Nashville, TN 37217

Dear Mr. Bracy:

This is in response to your letter of February 26, 2004 and our conversation of March 15, 2004.

As we discussed, group and individual prepaid legal products are regulated as insurance in Tennessee. Metropolitan Property and Casualty Insurance Company ("Metropolitan") underwrites and offers this product in Tennessee. Hyatt Legal Plans, Inc. ("Hyatt") acts as the administrator of the plans underwritten by Metropolitan. Metropolitan bears the ultimate responsibility for the legal matters covered under the legal plans it issues. This means if a legal plan member has a covered legal service in Tennessee, Metropolitan is responsible for paying a lawyer to provide the covered services and is therefore ultimately responsible for the coverage.

Based on the above and from the terms of Rule 44 and the definition of Intermediary Organizations in Rule 7.6, the new regulations would not apply to Metropolitan Property and Casualty Insurance Company or Hyatt Legal Plans.

Thank you again for your inquiry and let me know if you any additional questions.

Very truly yours,



Andrew Kohn