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Attorneys for the Liberty Mutual Insurance Group

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

CATHERINE E. SATTERLEE, et al.,

Petitioners,

VS.

LUMBERMAN'S MUTUAL CASUALTY
COMPANY, et al.,

Respondents.

WCC No. 2003-0840

MOTION TO DISMISS AMERICAN
AMBASSADOR CASUALTY CO. AND
NATIONAL INSURANCE ASSOC.

MOTION

COME NOW American Ambassador Casualty Company and National Insurance Association pursuant to ARM 24.5.329 and moves the Court for an order dismissing with prejudice American Ambassador Casualty Company and National Insurance Association as possible insurers for the reasons set forth below.

BRIEF

American Ambassador Casualty Company and National Insurance Association are member companies of the Liberty Mutual Insurance Group. Neither American Ambassador Casualty Company nor National Insurance Association have ever written workers' compensation coverage in the State of Montana and therefore request they be dismissed with prejudice from this proceeding.

DATED this 20th day of June, 2005.

Carrie L. Garber

Attorney for Liberty Mutual Ins. Group

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of June, 2005, I served the original of the foregoing MOTION TO DISMISS AMERICAN AMBASSADOR CASUALTY CO. AND NATIONAL INS. ASSOC. AND SUPPORTING BRIEF, first-class mail, postage prepaid, on the following:

Ms. Patricia J. Kessner Clerk of Court Workers' Compensation Court P. O. Box 537 Helena, MT 59624-0537

and a copy of the same to the following:

Jim Hunt Hunt Law Firm P.O. Box 1711 Helena, MT 59624

Tom Murphy Murphy Law Firm P.O. Box 3226 Great Falls, MT 59403-3226

Carrie L. Garber