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June 9, 2005

Workers' Compensation Court
of the State of Montana
P.O. Box 537
Helena, MT 59624-0537

FILED

JUN 13 2005

OFFICE OF
WORKERS' COMPENSATION JUDGE
HELENA, MONTANA

Re: Robert Flynn vs. Montana State Fund
WCC No. 2002-067
Our file: 26762.00A103

Dear Sir/Madam:

We are attorneys for Allianz Global Risk US Insurance Co. which has been named in a Summons and Notice of Attorney Fee Lien in the referenced matter. The Petitioner's request for certification of a common fund and enforcement of his attorney's lien requires an answer, which is set forth below.

After full inquiry, the workers' compensation claim department of Allianz has found no record that it has ever paid a workers' compensation claim to a petitioner in Montana. Therefore, it asks the court to make a determination that no attorneys' fees are due from it, and that no further participation in the matter is required of it.

If further response to the petition is required, please advise the undersigned of what is required.

Very truly yours,

WILLIAMS MONTGOMERY & JOHN LTD.

By:  Lloyd E. Williams, Jr.

cc Mr. Mike Davies
Allianz Global Risks US Insurance Co.
2350 Empire Ave.
Burbank, CA 91504-3350

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