

X Caterpillar Insurance has never written workers' compensation insurance in the State of Montana;

_____ (NAME OF INSURER OR SELF-INSURER) does not have any Montana claims;

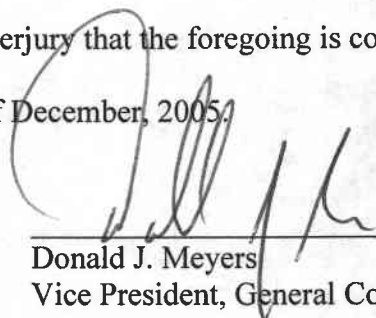
_____ (NAME OF INSURER OR SELF-INSURER) has no claimants meeting the Court's criteria in this matter as set forth in the summons;

_____ (NAME OF INSURER OR SELF-INSURER) was or is in liquidation during the period in question set forth in the amended summons served upon me.

I understand that the Montana Workers' Compensation Court may allow a period of up to 90 days from the date of filing this affidavit within which Petitioner's counsel may conduct discovery and investigation for the limited purpose of providing or disproving the foregoing statement(s) made by me on behalf of Caterpillar Insurance Company. After such 90 days, if no objection is lodged by the Petitioner's counsel, the Court will dismiss the insurer/self-insurer from this action based on the sworn statements made by me in this affidavit.

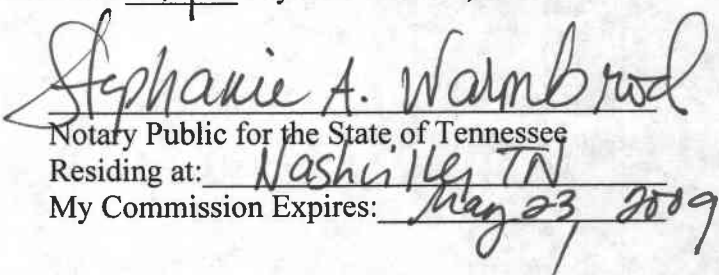
I declare under penalty of perjury that the foregoing is correct.

DATED this 14th day of December, 2005.



Donald J. Meyers
Vice President, General Counsel & Secretary

Signed and sworn to before me this 14 day of December, 2005.



Notary Public for the State of Tennessee
Residing at: Nashville, TN
My Commission Expires: May 23, 2009



My Commission Expires MAY 23, 2009



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**Caterpillar Financial
Services Corporation**

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P.O. Box 340001
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USA

December 15, 2005

VIA U.S. REGULAR MAIL

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

**Re: *Robert Flynn and Carl Miller v. Montana State Fund and Liberty
Northwest Insurance Corporation, et al.,
WCC No. 2000-0222***

***Catherine Satterlee v. Lumberman's Mutual Casualty Company, et
al., WCC No. 2003-0840***

Dale Reesor v. Montana State Fund, WCC No. 2002-0676

***Cassandra Schmill v. Liberty Northwest Insurance Corporation
and Montana State Fund, WCC No. 2001-0300***

Dear Ms. Kessner:

I am in receipt of the Workers' Compensation Court's Memorandum requesting insurance companies to complete a form affidavit for dismissal from the above referenced actions. Please find enclosed Affidavits of Donald J. Meyers supporting dismissal of Cat Insurance Company from:

1. Robert Flynn and Carl Miller v. Montana State Fund and Liberty Northwest Insurance Corporation, et al., WCC No. 2000-0222;
2. Catherine Satterlee v. Lumberman's Mutual Casualty Company, et al., WCC No. 2003-0840;
3. Dale Reesor v. Montana State Fund, WCC No. 2002-0676; and

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4. Cassandra Schmill v. Liberty Northwest Insurance Corporation and
Montana State Fund, WCC No. 2001-0300.

For the reasons set forth in the enclosed Affidavits of Donald J. Meyers, I respectfully request that Caterpillar Insurance Company be dismissed from each of the above referenced actions before the Workers' Compensation Court for Montana.

Yours truly,



Sandi L. Pack
Litigation Attorney
Caterpillar Financial Services Corporation
on behalf of Caterpillar Insurance Company

Enclosures

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