

Larry W. Jones
 Law Office of Jones & Garber
 An Insurance Company Law Division
 700 SW Higgins Avenue, Suite 108
 Missoula, MT 59803-1489
 (406) 543-2420
 (406) 829-3436 (FAX)
 Attorney for the Liberty Mutual Insurance Group

FILED

JUN 13 2005

OFFICE OF
 WORKERS' COMPENSATION JUDGE
 HELENA, MONTANA

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

ROBERT FLYNN,)
)
 and)
)
 CARL MILLER, Individually and on Behalf of)
 Others Similarly Situated)
)
 Petitioners)
)
 vs.)
)
 MONTANA STATE FUND,)
)
 Respondent/Insurer.)
)
 and)
)
 LIBERTY NORTHWEST INS. CORPORATION,)
)
 Intervenor.)

WCC No. 2000-0222

**MOTION TO DISMISS
 AMERICAN AMBASSADOR
 CASUALTY CO. AND
 NATIONAL INS. ASSOC.
 AND SUPPORTING BRIEF**

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 10th day of June, 2005.



Larry W. Jones

Attorney for Liberty Mutual Ins. Group

CERTIFICATE OF SERVICE

I hereby certify that on the 12 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:

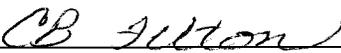
Ms. Patricia J. Kessner
Clerk of Court
Workers' Compensation Court
P. O. Box 537
Helena, MT 59624-0537

and a copy of the same to the following:

Rex Palmer
Attorneys, Inc., P.C.
301 West Spruce
Missoula, MT 59802

Bradley J. Luck
Garlington, Lohn & Robinson, PLLP
P. O. Box 7909
Missoula, MT 59807-7909

Thomas E. Martello
Legal Counsel
Montana State Fund
P. O. Box 4759
Helena, MT 59604-4759



Cindy Brown Felton