

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

DALE REESOR,)	WCC No. 2002-0676
)	
Petitioner,)	
)	
vs.)	MOTION TO DISMISS
)	AMERICAN AMBASSADOR
MONTANA STATE FUND,)	CASUALTY CO. AND
)	NATIONAL INS. ASSOC.
Respondent/Insurer.)	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 Insurance Group

CERTIFICATE OF SERVICE

I hereby certify that on the 10th 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:

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

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