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NATIONAL INSURANCE COMPANY and
GENERAL SECURITY NATIONAL
INSURANCE COMPANY as Attorney-in-Fact
for GENERAL SECURITY INSURANCE
COMPANY

FILED

AUG 4 2005

OFFICE OF
WORKER'S COMPENSATION JUDGE
HELENA, MONTANA

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

DALE REESOR,

Petitioner,

-vs-

MONTANA STATE FUND,

Respondent/Insurer.

WCC No. 2000-0676

MOTION TO DISMISS AND
BRIEF IN SUPPORT

COMES NOW General Security National Insurance Company ("GSNIC"), responding through its attorneys CROWLEY, HAUGHEY, HANSON, TOOLE & DIETRICH P.L.L.P. to the *Summons and Notice of Attorney Fee Lien* dated April 22, 2005, respectfully moves to dismiss GSNIC from the above-entitled action for the reasons that follow.

1. GSNIC has not written any workers' compensation insurance policies for Montana employers on or after July 1, 1987.

2. In response to the *Summons and Notice of Attorney Fee Lien*, GSNIC conducted a diligent investigation and review of its reasonably available claim records. GSNIC has no record of receiving or covering a workers' compensation insurance claim against it or General Security Insurance Company¹ from a claimant in the State of Montana from July 1, 1987 to the present.

¹ GSNIC is the Attorney-in-Fact for General Security Insurance Company. General Security Insurance Company was included among those respondents that filed a motion to dismiss on June 21, 2005 (Document # 237 on the Court's *Reesor* Website).

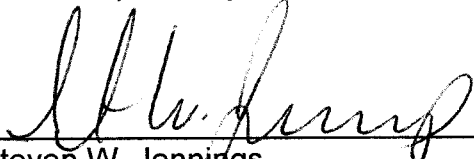
3. Because no claimants have any claim to recovery against GSNIC in this action, GSNIC should be dismissed with prejudice from this action.

4. Counsel for Petitioner Tom Murphy has been consulted regarding this motion and does not object.

WHEREFORE, GSNIC prays that this Court enter an order:

- (A) Dismissing GSNIC with prejudice; and
- (B) Awarding such other relief as the Court may deem just and proper.


Dated: August 3, 2005

By: 
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CERTIFICATE OF SERVICE

I, STEVEN W. JENNINGS, one of the attorneys for the law firm of Crowley, Haughey, Hanson, Toole & Dietrich P.L.L.P., hereby certify that on the 3rd day of August, 2005, I mailed a true and correct copy of the foregoing document, postage prepaid, to the following:

Mr. Thomas J. Murphy
Murphy Law Firm
PO Box 3226
Great Falls, MT 59403-3226


STEVEN W. JENNINGS