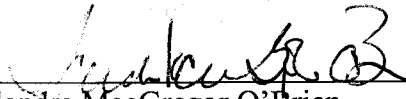


with a date of loss of November 16, 1988 however the liability for this claim and for all claims of American Mutual Liability Insurance Company with accident dates on and after January 1, 1988 were assumed by American Policyholders' Insurance Company (now American Policyholders' Liquidating Trust) pursuant to an intercompany reinsurance agreement.


5. I understand that the Montana Workers' Compensation Court may allow a period of up to 90 days from the date of the filing of this affidavit within which Petitioner's counsel may conduct discovery and investigation for the limited purpose of proving or disproving the foregoing statement made by me on behalf of American Mutual Liability Insurance Company. After such 90 days, if no objection is lodged by the Petitioner's counsel, the Court will dismiss American Mutual Liability Insurance Company from this action based on the sworn statements made by me in this affidavit.
6. I declare under penalty of perjury that the foregoing is correct.

DATED this 22 day of December, 2005.



Sandra MacGregor O'Brien
Counsel

Signed and sworn to before me this 22nd day of December, 2005.



Notary Public for the Commonwealth of
Massachusetts
Residing at: Melham
My commission expires: 1-20-06



INSURANCE COMPANIES
In Liquidation

100 UNICORN PARK DRIVE
WOBURN, MA 01801
VOICE: 781.937.0511
FAX: 781.937.0551

December 27, 2005

Ms. Jackie Bockman
Deputy Clerk
Workers' Compensation Court
P.O. Box 537
Helena, Montana 59624-0357

Re: Request for Dismissal from Common Fund Matters

Dear Ms. Bockman:

Enclosed please find affidavits that have been prepared on behalf of American Mutual Liability Insurance Company (in Liquidation) and AMI Liquidating Trust, the successor to the former operations of American Mutual Insurance Company of Boston.

Effective November 1, 2005 the Massachusetts Supreme Judicial Court for Suffolk County, the supervisory court for the liquidation of American Mutual Liability Insurance Company and American Mutual Insurance Company of Boston approved the sale of the charter, licenses and minimum surplus to Liberty Mutual Group Inc. The remainder of all other liabilities and assets were transferred to the AMI Liquidating Trust.

If you should have any questions regarding these affidavits please feel free to contact me.

Very truly yours,

Sandra MacGregor O'Brien
Counsel