

FILED

JAN 23 2006

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

OFFICE OF
WORKERS' COMPENSATION JUDGE
HELENA, MONTANA

WCC No. 2001-0300

CASSANDRA SCHMILL

Petitioner

vs.

LIBERTY NORTHWEST INSURANCE CORPORATION

Respondent/Insurer

MONTANA STATE FUND

Intervenor.

AFFIDAVIT

STATE OF Illinois)
County of Cook) : ss.

¶1 I, John B. Euwema (NAME), being first duly sworn upon oath, depose and say:

¶2 I, John B. Euwema (NAME), am the Attorney-in-Fact (POSITION) of AIG Premier Insurance Company (NAME OF INSURER OR SELF-INSURER).

¶3 In my capacity as Attorney-in-Fact (POSITION) of AIG Premier Insurance Company (NAME OF INSURER OR SELF-INSURER), I am authorized to make the statements set forth in this affidavit on behalf of AIG Premier Insurance Company (NAME OF INSURER OR SELF-INSURER) and to bind AIG Premier Insurance Company (NAME OF INSURER OR SELF-INSURER) by these statements.

¶4 After a review of our records, I swear under oath that AIG Premier Insurance Company (NAME OF INSURER OR SELF-INSURER) should be dismissed from the above-entitled action for any or all of the following reasons (check any or all that apply):

- AIG Premier Insurance Company (NAME OF INSURER OR SELF-INSURER) has never written workers' compensation insurance in the state of Montana;
- AIG Premier Insurance Company (NAME OF INSURER OR SELF-INSURER) does not have any Montana claims;
- AIG Premier Insurance Company (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.

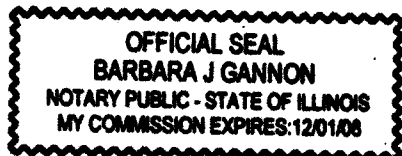
¶5 I understand that the Montana Workers' Compensation Court may allow a period of up to 90 days from the date of filing this affidavit within which Petitioner's counsel may conduct discovery and investigation for the limited purpose of proving or disproving the foregoing statement(s) made by me on behalf of AIG Premier Insurance Company (NAME OF INSURER OR SELF-INSURER). 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.

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

DATED this 23rd day of January, 2006.

John B. Euwema
 John B. Euwema (Name)
 Sr. VP of Heritage Casualty Insurance Company
 Attorney-In-Fact for AIG Premier Insurance
 Company (Title)

Signed and sworn to before me this 23rd day of January, 2006.



(SEAL)

Barbara J Gannon
 Notary Public for the State of Illinois
 Residing at: 200 N. Martingale Road, Schaumburg
 My Commission Expires: 12/1/08



GE Consumer Finance
Partnership Marketing
Group

Via Federal Express

January 23, 2006

Ms. Patricia J. Kessner
Clerk of Worker's Compensation Court
1625 11th Avenue
Helena, Montana 59624-0537

**RE: AIG Premier Insurance Company
 Heritage Casualty Insurance Company**

Dear Ms. Kessner:

Enclosed please find executed Affidavits for the above-referenced companies that have also been e-mailed and faxed to your attention on this date.

Should you have any questions regarding these Affidavits, please do not hesitate to contact John Euwema of our offices at (847) 605-7390.

Sincerely,

A handwritten signature in cursive script that reads 'Barbara J. Gannon'.

Barbara J. Gannon
Sr. Administrative Assistant

/bjg

Enclosures

John B. Euwema
Sr. VP, Secretary &
General Counsel

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