

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

WCC No. 2001-0300

FILED

CASSANDRA SCHMILL

JAN 24 2006

Petitioner

OFFICE OF
WORKERS' COMPENSATION JUDGE
HELENA, MONTANA

vs.

LIBERTY NORTHWEST INSURANCE CORPORATION

Respondent/Insurer

MONTANA STATE FUND

Intervenor.

AFFIDAVIT

STATE OF New York)
) : ss.
County of New York)

¶1 I, Corcoran H. Byrne (NAME), being first duly sworn upon oath, depose and say:

¶2 I, Corcoran H. Byrne (NAME), am the General Counsel (POSITION) of Converium Reinsurance (North America) Inc. (NAME OF INSURER OR SELF-INSURER).

¶3 In my capacity as General Counsel (POSITION) of Converium Reinsurance (North America) Inc. (NAME OF INSURER OR SELF-INSURER), I am authorized to make the statements set forth in this affidavit on behalf of Converium Reinsurance (North America) Inc. (NAME OF INSURER OR SELF-INSURER) and to bind Converium Reinsurance (North America) Inc. (NAME OF INSURER OR SELF-INSURER) by these statements.

¶4 After a review of our records, I swear under oath that Converium Reinsurance (North America) Inc. (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):

DOCKET ITEM NO. 186



Paul R. Brady
Senior Compliance Analyst

January 18, 2006

**Via: Certified Mail/Return Receipt Requested
7001 2510 0006 0337 8517**

Workers' Compensation Court
1625 11th Avenue
Helena, Montana 59624-0537

**Re: In Response To: Cassandra Schmill vs. Liberty
Northwest Insurance Corporation
WCC No. 2001-0300
Response From: Converium Reinsurance (North America) Inc. and
Converium Insurance (North America) Inc.**

To Whom It May Concern:

**Converium Reinsurance
(North America) Inc.
F/K/A ZC Insurance Company**

One Canterbury Green
Stamford, CT
06901

Phone 212 898 5000
Fax 212 898 5052
<http://www.converium.com>

Direct Phone 212 898 5241
Direct Fax 212 898 5212
paul.brady@converium.com

In response to the attached Amended Summons and Notice of Attorney Fee Lien referenced above, enclosed are the officially signed and notarized responses for both Converium Insurance (North America) Inc. and its parent Converium Reinsurance (North America) Inc.

Neither company has ever committed any of the following actions in the State of Montana: written primary workers' compensation insurance, had any primary workers compensation claims, nor has either company met any of the court's criteria in this matter as set forth in the attached summons.

Do not hesitate to contact me in writing if further information or clarifications are requested.

Sincerely,

Paul R. Brady
Senior Compliance Analyst
(212) 898-5241

cc: Ms. Laurie Wallace
Bothe & Lauridsen, P.C.
P.O. Box 2020
Columbia Falls, Montana 59912
Via: Federal Express
8499 2306 0872 0215