



\_\_\_\_\_ (NAME OF INSURER OR SELF-INSURER) has never written workers' compensation insurance in the State of Montana;

\_\_\_\_\_ (NAME OF INSURER OR SELF-INSURER) does not have any Montana claims;

Metropolitan Property and Casualty Insurance Company 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 Metropolitan Property and Casualty Insurance Company. 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 28<sup>th</sup> day of September, 2006.



\_\_\_\_\_  
Maura C. Travers

Secretary  
(Title)

Signed and sworn to before me this 28<sup>th</sup> day of September, 2006.

  
\_\_\_\_\_  
Notary Public for the State of Rhode Island  
Residing at: Coventry, Rhode Island  
My Commission Expires: 6/29/09

(SEAL)

700 Quaker Lane, PO Box 350, Warwick, RI 02887  
Tel 401 827-3841 Fax 401 827-2674  
mmccabe@metlife.com

**MetLife**® Auto & Home

**Michael J. McCabe**  
Counsel

September 28, 2006

Workers' Compensation Court  
P.O. Box 537  
Helena, Montana 59624-0537

RE: *Schmill vs. Liberty Northwest Insurance Corporation, et al.*  
WCC No. 2001-0300  
Amended Summons and Notice of Attorney Fee Lien

Dear Sir/Madam:

Please accept this letter as our formal response to the above referenced matter, specifically, we are enclosing fully executed Affidavits on behalf of

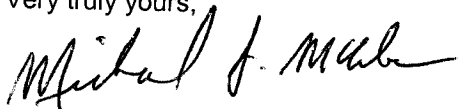
Metropolitan Property and Casualty Insurance Company  
Metropolitan Direct Property and Casualty Insurance Company  
Metropolitan General Insurance Company  
Economy Fire & Casualty Company  
Economy Preferred Insurance Company  
Economy Premier Assurance Company

for purposes of dismissing these companies from the *Schmill* case.

We understand that, if after 90 days, no objection is lodged by Petitioner's counsel, the Court will dismiss the above referenced companies from this action.

Thank you for your attention to this matter.

Very truly yours,



Michael J. McCabe  
Counsel

MJM/soc

cc: Laurie Wallace, Esq.  
Bothe & Lauridsen, P.C.  
P. O. Box 2020  
Columbia Falls, Montana 59912

Enclosures (6 Affidavits)