

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

WCC No. 2001-0300

Cassandra M. Schmill

Petitioner

vs.

Liberty Northwest Insurance Company

Respondent/Insurer.

FILED

OCT - 2 2006

OFFICE OF
WORKERS' COMPENSATION JUDGE
HELENA, MONTANA

AFFIDAVIT

STATE OF ILLINOIS)
 : ss.
County of McLean)

¶1 I, Jeffrey Gendron, being first duly sworn upon oath, depose and say:

¶2 I, Jeffrey Gendron, am the Senior Vice-President, Property/Casualty Operations of **COUNTRY Preferred Insurance Company**.

¶3 In my capacity as the Senior Vice-President, Property/Casualty Operations of **COUNTRY Preferred Insurance Company**, I am authorized to make the statements set forth in this affidavit on behalf of **COUNTRY Preferred Insurance Company** and to bind **COUNTRY Preferred Insurance Company** by these statements.

¶4 After a review of our records, I swear under oath that **COUNTRY Preferred Insurance Company** 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. 301

- COUNTRY Preferred Insurance Company** has never written workers' compensation insurance in the state of Montana;
- COUNTRY Preferred Insurance Company** does not have any Montana claims;
- COUNTRY Preferred Insurance Company** has no claimants meeting the Court's criteria in this matter as set forth in the summons;
- COUNTRY Preferred Insurance Company** 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 counsel for Petitioner[s] may conduct discovery and investigation for the limited purpose of proving or disproving the foregoing statement(s) made by me on behalf of **COUNTRY Preferred Insurance Company**. After such 90 days, if no objection is lodged by counsel for Petitioner[s], the Court will dismiss the insurer/self-insurer from this action based on the sworn statements made by me in this affidavit.

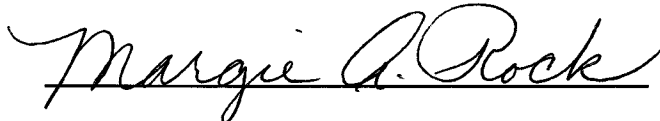
¶6 I declare under penalty of perjury that the foregoing is correct.

DATED this 26th day of September, 2006.



Jeffrey C. Gendron
Senior Vice-President
Property/Casualty Operations
COUNTRY Preferred Insurance Company

Signed and sworn to before me this 26th day of September, 2006.



Notary Public for the State of Illinois
Residing at: Roberts, Illinois
My Commission Expires: 6-11-07

(SEAL)

