

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA
WCC No. 2001-0300

FILED

CASSANDRA SCHMILL

NOV 21 2006

Petitioner

OFFICE OF
WORKERS' COMPENSATION JUDGE
HELENA, MONTANA

vs.

LIBERTY NORTHWEST INSURANCE CORPORATION

Respondent/Insurer

MONTANA STATE FUND

Intervenor.

AFFIDAVIT OF DAVID A. SEISER
FOR CHURCH MUTUAL INSURANCE COMPANY

STATE OF WISCONSIN)
: ss.
County of LINCOLN)

I, DAVID A. SEISER, being first duly sworn upon oath, deposes, and says:

1. I, DAVID A. SEISER, am the Claims Manager of Workers' Compensation for Church Mutual Insurance Company.

2. In my capacity as Claims Manager of Workers' Compensation for Church Mutual Insurance Company, I am authorized to make the statements set forth in this affidavit on behalf of Church Mutual Insurance Company and to bind Church Mutual Insurance Company by these statements.

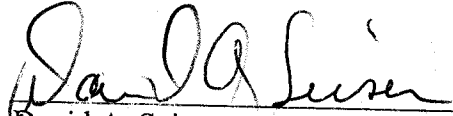
3. After a review of our records, I swear under oath that Church Mutual Insurance Company should be dismissed from the above-entitled action for any or all of the following reasons:

**CHURCH MUTUAL INSURANCE COMPANY HAS NO CLAIMANTS
MEETING THE COURT'S CRITERIA IN THIS MATTER AS SET
FORTH IN THE SUMMONS.**

4. 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 Church Mutual 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.

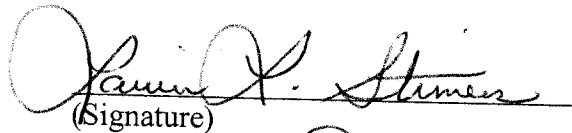
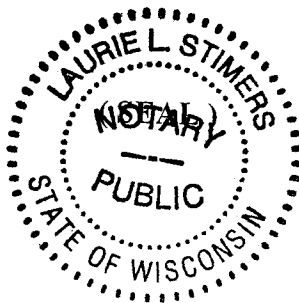
5. I declare under penalty of perjury that the foregoing is correct.

DATED this 14th day of November, 2006.



David A. Seiser,
Claims Manager of Workers'
Compensation for Church Mutual
Insurance Company

Signed and sworn to before me this 14th day of NOVEMBER, 2006.



(Signature)

LAURIE L. STIMERS
(Printed Name)

Notary Public for the State of Wisconsin
Residing at MERRILL, Wisconsin
My Commission Expires: 1/11/2009



CURT DRAKE

~Selected to the American Board of Trial Advocates~
curt@drakemt.com

JULIA W. SWINGLEY

julia@drakemt.com

111 North Last Chance Gulch
Suite 3J, Arcade Building
P.O. Box 1181 • Helena, MT 59624-1181

PHONE: 406/495-8080

FAX: 406/495-1616

November 20, 2006

Ms. Pat Kessner
Clerk of Court
WORKERS' COMPENSATION COURT
P. O. Box 537
Helena, MT 59624-0357

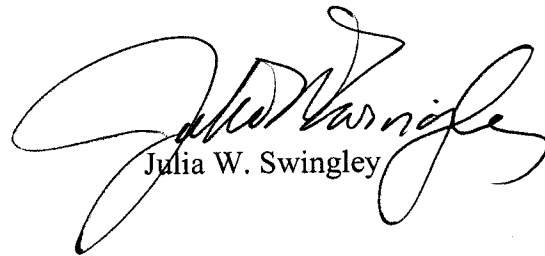
Re: Cassandra Schmill v. Liberty Northwest Insurance Corporation; No. 2001-0300

Dear Pat:

Enclosed for filing please find an original Affidavit from David A. Seiser, the Claims Manager of Workers' Compensation for Church Mutual Insurance Company, requesting that Church Mutual's insurers be dismissed from the above-referenced cause.

Please feel free to contact me with any questions. Thank you.

Sincerely,



Julia W. Swingley

JWS/vc
Enclosure

cc: Laurie Wallace, Esq.
Mr. David A. Seiser