

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

WCC No. 2001 - 0300

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CASSANDRA SCHMILL

Petitioner

vs.

LIBERTY NORTHWEST INSURANCE CORPORATION

Respondent/Insurer,

MONTANA STATE FUND

Intervenor.

**FILED**

JUN 22 2012

OFFICE OF  
WORKER'S COMPENSATION JUDGE  
HELENA, MONTANA

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AFFIDAVIT

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STATE OF CALIFORNIA)

: ss.

County of ORANGE)

1. I, Victoria Sheldon, being first duly sworn upon oath, depose and say:
2. I, Victoria Sheldon, am an Account Manager for the Third Party Workers Compensation Claims Administrator of Chubb Indemnity Ins. Co.
3. In my capacity as the Account Manager for the Third Party Workers Compensation Claims Administrator of Chubb Indemnity Ins. Co., I am authorized to make the statements set forth in this affidavit on behalf of Chubb Indemnity Ins. Co. and to bind Chubb Indemnity Ins. Co. by these statements.
4. After a review of our records, I swear under oath that the following Chubb companies:  
  
*Chubb Indemnity Ins. Co., Chubb National Ins. Co., Executive Risk Indemnity Inc., Federal Ins. Co., Great Northern Ins. Co., Pacific Indemnity CO., and Quadrant Indemnity Co.*

DOCKET ITEM NO. 549

should be dismissed from the above-entitled action for any or all of the following reasons (check any or all that apply):

- Chubb Indemnity Ins. Co., Chubb National Ins. Co., Executive Risk Indemnity Inc., Federal Ins. Co., Great Northern Ins. Co., Pacific Indemnity CO., and Quadrant Indemnity Co. has never written workers' compensation insurance in the State of Montana;*
- Chubb Indemnity Ins. Co., Chubb National Ins. Co., Executive Risk Indemnity Inc., Federal Ins. Co., Great Northern Ins. Co., Pacific Indemnity CO., and Quadrant Indemnity Co. does not have any Montana claims;*
- Chubb Indemnity Ins. Co., Chubb National Ins. Co., Executive Risk Indemnity Inc., Federal Ins. Co., Great Northern Ins. Co., Pacific Indemnity CO., and Quadrant Indemnity Co. has no claimants meeting the Court's criteria in this matter as set forth in the summons;*
- Chubb Indemnity Ins. Co., Chubb National Ins. Co., Executive Risk Indemnity Inc., Federal Ins. Co., Great Northern Ins. Co., Pacific Indemnity CO., and Quadrant Indemnity Co. 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 Chubb Indemnity Ins. Co. 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.

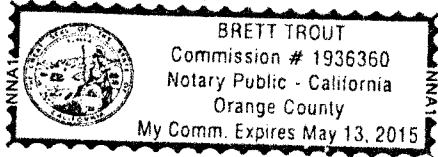
¶6 I declare under penalty of perjury that the foregoing is correct.

DATED this 18<sup>th</sup> day of June 2012.

*Victoria F. Sheldon*  
(Name)

*Senior Account Manager*  
(Title)

Signed and sworn to before me this 18<sup>th</sup> day of June 2012.



(NOTARIAL SEAL)

*Brett Trout*

[Signature of Notary]

*Brett Trout*

[Typed, stamped, or printed Name of Notary]

Notary Public for the State of CA

Residing at Aliso Viejo, Orange County

My commission expires: 05/13/2015

CROWLEY | FLECK PLLP  
ATTORNEYS

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[jbaewer@crowleyfleck.com](mailto:jbaewer@crowleyfleck.com)

June 21, 2012

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

RE: *Schmill v. Liberty NW Ins. Co. & MT State Fund*  
WCC No.: 2001-0300

Dear Clerk of Court:

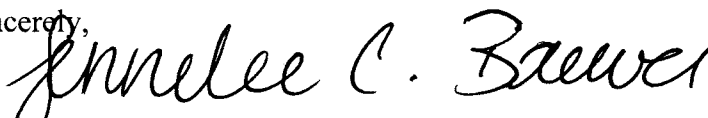
Enclosed please find the original and one copy of an affidavit for CHUBB Insurance Companies, which include:

- *Chubb Indemnity Ins. Co.*
- *Chubb National Ins. Co.*
- *Executive Risk Indemnity Inc.*
- *Federal Ins. Co.*
- *Great Northern Ins. Co.*
- *Pacific Indemnity CO.*
- *Quadrant Indemnity Co.*

After filing the original, please time-stamp the copy and return it to our office in the enclosed postage prepaid envelope.

If you have any questions, please call.

Sincerely,



JENNILEE C. BAEWER, Certified PLS

Enclosures

c: clients, w/o enc.