LAW OFFICES OF SIEWART, BELDEN, SENSENICH AND HERRINGTON 100 NORTH MAIN STREET OLD A. STEWART GREENSBURG, PENNSYLVANIA REGINALD DELDEN OUIS E. SENSTNICH EDGAR P. HERRINGTON DANIEL R. EDWARDS AREA CODE 412 834-0300 GEORGE M. LYNCH Brode Bort Class EGINALD BELDEN; JR September 1, 1971 BEF. MARSH III Liberty Matual Insurance Company IVED 717 Li Bert' Avenu Pittyburgh, Pennsyl ania 15222 41971 R.B. SPERLING Attention: R. B. W1113 Your File No. P831-55884 Re: Thomas Brown vs: Montgomery Ward & Co. Dear Mr. Wills:

I acknowledge receipt of your letter of August 26 authorizing us to continue our representation of Montgomery Ward on behalf of Liberty Mutual Insurance Company.

We felt that Montgomery Ward should join Charles Kuncher as an additional defendant, and since Mr. Kuncher is already a party to the action, it was necessary to prepare an Answer and New Matter to effect the joinder. I contacted the Greengate store of Montgomery Ward and had the Office Manager, Edward LaRocque, execute the pleading, and it has been filed in the prothonotary's office. I enclose a copy for your file.

You will be advised of all developments.

Very truly yours,

had been

H. Reginald Belden

HRB:RM CC: G. Fletcher Ward, Jr.