

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BLACKWATER SECURITY CONSULTING, LLC, a
Delaware Limited Liability Company; and
BLACKWATER LODGE AND TRAINING
CENTER, INC., a Delaware Corporation

Plaintiffs,

vs.

WESTCHESTER SURPLUS LINES INSURANCE
COMPANY, a Georgia Corporation

and

EVANSTON INSURANCE COMPANY, an Illinois
Corporation

and

FIDELITY AND CASUALTY COMPANY OF NEW
YORK, a South Carolina Corporation

and

LIBERTY INSURANCE UNDERWRITERS, a
Massachusetts Corporation

Defendants.

CIVIL ACTION NO. 05-6020

**DEFENDANT, WESTCHESTER SURPLUS LINES INSURANCE
COMPANY'S RESPONSE TO DEFENDANTS' MOTION
TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

Defendant, Westchester Surplus Lines Insurance Company (hereinafter "Westchester") by and through its undersigned counsel hereby responds, in part, to Defendants' Motion to Transfer Venue as follows:

1. It is admitted that Westchester does business and has contacts in North Carolina.
2. It is admitted that Westchester is incorporated in Georgia and has a principal place of business in Roswell, Georgia.
8. It is admitted that Westchester is aware of no relationship between Pennsylvania and the issues in dispute in this action, none of the events related to the issuance of Westchester's policy took place in Pennsylvania and there are no witnesses or documents relating to the issuance of Westchester's policy located in Pennsylvania.

WHEREFORE, Answering Defendant, Westchester Surplus Lines Insurance Company
consents to Defendants' Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a).

BY: /s/ Francis J. Deasey (Valid Code FD1214)

/s/ James W. Daly (Valid Code JD1216)

FRANCIS J. DEASEY, ESQUIRE (Atty. ID 25699)

JAMES W. DALY, ESQUIRE (Atty. ID 37660)

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DATED: May 1, 2006

CERTIFICATE OF SERVICE

I, FRANCIS J. DEASEY, ESQUIRE, hereby certify that a true and correct copy of the Defendant, Westchester Surplus Lines Insurance Company's Response to Defendants' Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a), was served this date, via United States First Class Mail, postage prepaid, to all counsel of record addressed as follows:

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