

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

2006 JAN 19 P 2 01

LUCRETIA MOONEY,)
)
 Plaintiff,)

vs.)

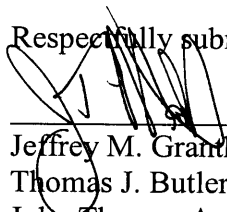
CIVIL ACTION NO.: 3:06 CV 55-DRB

AMERICAN INTERNATIONAL GROUP,)
 INC.; AMERICAN GENERAL)
 CORPORATION; AMERICAN GENERAL)
 FINANCE, INC.; AMERICAN GENERAL)
 FINANCIAL SERVICES OF ALABAMA,)
 INC.; AMERICAN GENERAL FINANCE)
 CORPORATION; MERIT LIFE)
 INSURANCE COMPANY; YOSEMITE)
 INSURANCE COMPANY; ROY EVANS;)
 MELODEE WYATT; and Fictitious)
 Defendants "A", "B", and "C", whether)
 singular or plural, those other persons,)
 corporations, firms, or other entities whose)
 wrongful conduct caused the injuries and)
 damages to the Plaintiff, all of whose true and)
 correct names are unknown to Plaintiff at)
 this time, but will be substituted by)
 amendment when ascertained,)
)
 Defendants.)

SPECIAL APPEARANCE - JOINDER AND CONSENT TO REMOVAL

Defendants American International Group, Inc. ("AIG") and American General Corporation ("AGC"), making a special appearance by and through their counsel of record, appear solely for the purpose of joining in and consenting to the removal of this action to the United States District Court for the Middle District of Alabama, Eastern Division. In so doing, AIG and AGC do not waive and specifically preserve their defense of lack of personal jurisdiction, as well as other defenses pursuant to Rule 12 of the Federal Rules of Civil Procedure.

Respectfully submitted,



Jeffrey M. Grantham (ASB-4866-M66J)
Thomas J. Butler (ASB-7790-T75T)
John Thomas A. Malatesta, III (ASB-4646-O70M)
Attorneys for Defendants American International
Group, Inc. and American General Corporation

OF COUNSEL:

MAYNARD, COOPER & GALE, P.C.
2400 AmSouth/Harbert Plaza
1901 Sixth Avenue North
Birmingham, Alabama 35203-2618
205-254-1000
205-254-1999 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person, by U. S. Mail, postage prepaid, on this the 19th day of January, 2006:

C. Lance Gould, Esq.
BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C.
272 Commerce Street
Montgomery, AL 36103

David Alan Elliott, Esq.
BURR & FORMAN LLP
SouthTrust Tower, Suite 3100
420 – 20th Street, North
Birmingham, AL 35203



OF COUNSEL