Steven W. Jennings Crowley, Haughey, Hanson, Toole & Dietrich P.L.L.P. P. O. Box 2529 Billings, MT 59103-2529 (406) 252-3441

FILED

JUN - 3 2005

OFFICE OF WORKERS' COMPENSATION JUDGE HELENA, MONTANA

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

DALE REESOR,	}
Petitioner,	WCC No. 2002-0676
VS.	MOTION TO EXTEND DEADLINE FOR RESPONSE
MONTANA STATE FUND,	
Respondent/Insurer.	

COMES NOW Respondents, American Guarantee & Liability Ins. Co., American Zurich Ins. Co., Assurance Company of America, Centre Insurance Company, Clarendon National Ins. Co., Colonial American Casualty & Surety, Fairfield Ins. Co., Fidelity & Deposit Co. of Maryland, General Reinsurance Corp., Genesis Insurance Company, Maryland Casualty Co., Northern Ins. Co. of New York, North Star Reinsurance Corporation, Valiant Insurance Company, Zurich American Ins. Co., and Zurich American Ins. Co. of Illinois ("Respondents") and move this Court for additional time to submit a response as ordered in this Court's Summons and Notice of Attorneys' Fee Lien dated April 22, 2005.

Crowley, Haughey, Hanson, Toole & Dietrich, P.L.L.P. ("The Crowley Firm") has on this date been engaged by Respondents to represent them as local counsel in the above entitled case. The Crowley Firm was referred to Respondents by their national counsel, Lord, Bissell & Brook, L.L.P. Lord, Bissell & Brook has advised that many of Respondents had not been served with this Court's *Summons and Notice of Attorneys' Fee Lien* and were unaware of their duty to respond and the June 6 deadline for such response. Accordingly, Respondents respectfully request that the June 6, 2005, deadline for the Response be extended until June 20, 2005. Counsel for Petitioner, Thomas Murphy, has been contacted and does not object to this motion.

Dated this <u>Jul</u> day of June, 2005.

CROWLEY, HAUGHEY, HANSON,

TOOME & DIETRICH P/L.L.P.

By:

STEVEN W. JENNING

## **CERTIFICATE OF SERVICE**

I, STEVEN W. JENNINGS, one of the attorneys for the law firm of Crowley, Haughey, Hanson, Toole & Dietrich P.L.L.P., hereby certify that on the 30 day of June, 2005, I mailed a true and correct copy of the foregoing document, postage prepaid, to the following:

Mr. Thomas J. Murphy Murphy Law Firm PO Box 3226 Great Falls, MT 59403-3226

STEVEN W. JENNINGS