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JUN 2 0 2005

Attorneys for Berkley Regional Insurance Company
Continental Western Insurance Company
Union Insurance Company
American West Insurance Company
Midwest Employers Casualty Company
StarNet Insurance Company

WORKER'S COMPENSATION JUDGE HELENA, MONTANA

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

DALE REESOR,)
Petitioner,))) WCC No. 2002-0676
-VS-)
MONTANA STATE FUND,) MOTION FOR EXTENSION OF TIME
Respondent/Insurer.)
	1

COME NOW Respondents/Insurers Berkley Regional Insurance Company, Continental Western Insurance Company, Union Insurance Company, American West Insurance Company, Midwest Employers Casualty Company, and StarNet Insurance Company, by and through their counsel, and move this Court for an extension of time, to and including Friday, July 1, 2005, within which to serve their Answer or other response to the April 22, 2005, Summons and Notice of Attorney Fee Lien.

Respondents/Insurers have been unable to compile the information necessary to respond to the Notice within the time provided. They reasonably believe, based on their investigation to date, that only one of them has sold insurance that may be covered by the Summons. By July 1, 2005, they should be able to provide a substantive response to the Summons.

1. MOTION FOR EXTENSION OF TIME

Thomas J. Murphy, Esq., counsel for the Petitioners, has been contacted. He has no objection to this Motion.

By filing this Motion, Respondent/Insurers do not intend to waive, and they specifically reserve, all jurisdictional defenses.

DATED this 20th day of June, 2005.

POORE, ROTH & ROBINSON, P.C.

By

Thomas M. Welsch

Attorneys for Berkley Regional Insurance
Company, Continental Western
Insurance Company, Union Insurance
Company, American West Insurance
Company, Midwest Employers Casualty
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OF COUNSEL ROBERT A. POORE URBAN L. ROTH

JAMES A. POORE, JR. (1916-2002)

June 20, 2005

VIA FACSIMILE & U.S. MAIL

Patricia J. Kessner Montana Workers Compensation Court 1625 11th Avenue P. O. Box 537 Helena, Montana 59624

Re:

DONALD C. ROBINSON

ROBERT C. BROWN

J. RICHARD ORIZOTTI

BRENDON J. ROHAN JOHN P. DAVIS

THOMAS M. WELSCH

TINA L. MORIN LEE BRUNER LISA A. LEVERT

PATRICK M. SULLIVAN

Ressor v. Montana State Fund

WCC No. 2002-0676

Dear Ms. Kessner:

Enclosed for filing in the above-captioned matter is a MOTION FOR EXTENSION OF TIME. Please acknowledge receipt and filing of this document by signing and returning the enclosed postcard.

I am also enclosing a proposed order. Please present the same to the Judge for his consideration and signature.

Thank you.

Sincerely yours,

POORE, ROTH & ROBINSON, P.C.

Thomas M. Welsch

TMW:jrk Enclosure