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Attorneys for the Liberty Mutual Insurance Group

## IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

CATHERINE E. SATTERLEE, et al.,

WCC No. 2003-0840

Petitioners,

VS.

NOTICE OF APPEARANCE AND INTENT TO INTERVENE

LUMBERMAN'S MUTUAL CASUALTY COMPANY, et al.,

Respondents.

COME NOW the Liberty Mutual Insurance Group (LMIG) companies, as listed below, pursuant to the Notice of Opportunity to Appear and Intervene dated April 18, 2005, and give notice that the listed companies hereby exercise their right to intervene and participate in the briefing and argument of Petitioners' constitutional challenge to § 39-71-710, MCA, Petitioners' request for class action or common fund certification, and any other issues raised therein.

To the best of above-listed counsel's knowledge, the LMIG companies listed in the Notice of Opportunity to Appear and Intervene are:

\* CUMIS Ins. Society Inc.

Employers Ins. of Wausau Mutual Co.

First Liberty Ins. Corp.

Liberty Ins. Corp.

Liberty Ins. Underwriters Inc.

Liberty Mutual Fire Ins. Co.

Liberty Mutual Ins. Co.

Liberty Northwest Ins. Corp.

LM General Ins. Co.

LM Ins. Corp.

LM Personal Ins. Co.

LM Property & Casualty Ins. Co.

\*\* One Beacon America Ins. Co.

\*\* One Beacon Ins. Co.

Wausau Business Ins. Co.

Wausau Underwriters Ins. Co.

(\* CUMIS Ins. Society Inc. is not presently a member of LMIG but may have been in the past.

\* \* The listed One Beacon entities are not members of LMIG but may have been acquired in whole or in part by Liberty Northwest Ins. Corp. in the past. Counsel will continue its investigation into the relationship between LMIG and these entities and report to the Court accordingly.)

DATED this 20<sup>th</sup> day of June, 2005.

Carrie L. Garber

## CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of June, 2005, I served a copy of the foregoing Motion to Extend Deadline for Response, first-class mail, postage prepaid, on the following:

Ms. Patricia J. Kessner Clerk of Court Workers' Compensation Court P. O. Box 537 Helena, MT 59624-0537

and a copy of the same to the following:

Jim Hunt Hunt Law Firm P.O. Box 1711 Helena, MT 59624

Tom Murphy Murphy Law Firm P.O. Box 3226 Great Falls, MT 59403-3226

Carrie L. Garber