Geoffrev R. Keller Shane P. McGovern Matovich & Keller, P.C. 2812 First Avenue North, Suite 225 P.O. Box 1098 Billings, Montana 59103-1098 Telephone: (406) 252-5500 Facsimile: (406) 252-4613 Attorneys for Respondent/Insurers Safeco Insurance Company of Illinois Safeco Insurance Company of America American Economy Insurance Company American States Insurance Company American Preferred Insurance Company First National Insurance Company of America General Insurance Company of America

FILED

AUG 2 2 2006

OFFICE OF WORKER'S COMPENSATION JUDGE HELENA, MONTANA

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

CATHERINE E. SATTERLEE, et al.,

Petitioners.

WCC No. 2003-0840

VS.

LUMBERMAN'S MUTUAL CASUALTY COMPANY, et al.

RESPONDENTS' NOTICE OF JOINDER OF MOTION FOR CROSS SUMMARY JUDGMENT

Respondents/Insurers.

The above referenced Respondent/Insurers hereby join in, and by this reference incorporate as if fully set forth herein, the arguments set forth by the State Fund in their Cross Motion for Partial Summary Judgment filed on August 8, 2005. The purpose of this notice is concurrent with the reasons set forth in Liberty Northwest Insurance Corporation's ("Liberty") July 28, 2006, motion. The above referenced Respondent/Insurers would respectfully request this Court include said Respondent/Insurers in the minute entry order requested by Liberty.

Dated this 22 of August 2006.

DOCKET ITEM NO. 344

MATOVICH & KELLER, P.C.

GEOFFREN R. KELT

2812 First Avenue North, Suite 225

P. O. Box 1098

Billings, MT 59103-1098

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served upon the following counsel of record, by the means designated below, this <u>ZZN</u> day of 2006:

U.S. Mail
FedEx
Hand-Delivery

Hand-Delivery Facsimile

] Email

M U.S. Mail FedEx

Hand-Delivery

Facsimile

Email

Mr. James G. Hunt Hunt & Molloy Law Firm 310 Broadway

310 Broadway Helena, MT 59601

Mr. Thomas J. Murphy Murphy Law Firm

PO Box 3226

Great Falls, MT 59403-3226

Geoffrey R Keller