Geoffrey R. Keller
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 Respondents:
American Economy Insurance Company
American States Insurance Company of America
American States Preferred Insurance Company
First National Insurance Company of America
General Insurance Company of America
Safeco Insurance Company of Illinois

FILED

JUN 1 6 2008

OFFICE OF WORKERS COMPENSATION JUDGE HELENA, MONTANA

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

CASSANDRA SCHMILL,	)
Petitioner,	) WCC No.: 2001-0300
vs.  LIBERTY NORTHWEST INSURANCE CORPORATION,  Respondent/Insurer,	RESPONDENT SAFECO COMPANIES' NOTICE OF JOINDER IN REPLY BRIEF REGARDING MOTION TO DISMISS ON "GATEWAY LEGAL ISSUES" )
and	)
MONTANA STATE FUND	) )
Intervenor.	) ) )
	•

COME NOW the above listed Respondent/Insurers, and hereby join in, and by this reference incorporate as if fully set forth herein, the arguments set forth by the Respondent/Insurers represented by Steven W. Jennings, Crowley Law Firm, in their Reply in Support of Their Motion to Dismiss on "Gateway Legal Issues" filed in this matter.

DATED this 16th day of June, 2008.

MATOVICH & KELLER, P.C.

By

GEOFFREY R. KELLER

Attorneys for Respondent/Insurers Safeco

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was mailed postage prepaid, to the following:

Ms. Laurie Wallace Bothe & Lauridsen, P.C. PO Box 2020 Columbia Falls, MT 59912

This 16th day of June, 2008.

Kelli M. Roberts

For MATOVICH & KELLER, P.C.



## MATOVICH & KELLER, P.C. Attorneys at Law

Carey E. Matouich Geoffrey R. Keller Brooke B. Murphy Benjamin O. Rechtfertig Eric E. Hohn

June 16, 2008

Via Facsimile (406) 444-7798 and U.S. Mail Clara Wilson Clerk of Court Workers' Compensation Court P.O. Box 537 1625 11<sup>th</sup> Avenue Helena, Montana 59624-0537

Re:

Schmill v. Liberty Northwest Insurance Corporation, et al

WWC No.: 2001-0300

Dear Ms. Wilson:

Enclosed for filing is the Respondent Safeco Companies' Notice of Joinder in Reply Brief Regarding Motion to Dismiss on "Gateway Legal Issues" and Respondent Safeco Companies' Concurrence in Responding Insurers' Statement on Implementation Issues. The originals will follow by U.S. Mail, with a copy of the same that we would request be date stamped and returned to our office.

Thank you for your assistance, and should you have any questions regarding the foregoing, please feel free to contact me directly.

Best regards.

Kelli M. Roberts

Legal Assistant

Enclosures