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FILED

FFR 2 4 2017

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,

VS.

MONTANA STATE FUND,

Intervenor.

RESPONSE TO ORDER TO SHOW CAUSE OF RESPONDENTS PLUM CREEK MANAGEMENT CO., L.P., PLUM CREEK TIMBER COMPANY, INC. AND PLUM CREEK TIMBER COMPANY L.P.

Come now Plum Creek Mgmt. Co., LP, Plum Creek Timber Co. Inc. Plum Creek Timber Co. LP, and respond to the Court's Order to Show Cause as follows:

DISCUSSION

Plum Creek Respondents through their new adjuster, Sedgwick & Company, report to Court the adjuster has reviewed over 300 claims that are possibly subject to Schmill. The adjuster is presently unable to confirm if any of the claimants meet the Schmill requirements. The adjuster is 90% complete in its research and should have this completed by March 3, 2017. A copy of the adjuster's e-mail to counsel is attached to this Response.

Dated this 22nd day of February, 2017.

HAMMER, OUNN & SHAW, PLLC

Todd A. Hammer 100 Financial Drive, Suite 100

PO Box 7310

Kalispell, MT 59901

Attorneys for Respondent/Insurer

DOCKET ITEM NO. 728

CERTIFICATE OF SERVICE

I do hereby certify that on the 22nd day of February, 2017, I served a copy of the foregoing in the above matter by mailing a copy thereof, first class postage prepaid to:

Laurie Wallace Bothe & Lauridsen, PC Attorney at Law P.O. Box 2020 Columbia Falls, MT 59912

Cold A Hammon