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



AUG 1 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,

VS.

LUMBERMAN'S MUTUAL CASUALTY COMPANY, et al.

Respondent/Insurer.

WCC No. 2003-0840

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO SATTERLEE'S MOTION AND BRIEF FOR AN ORDER ALLOWING DISCOVERY

COME NOW the above listed insurers ("Respondents") and move this Court for an Order extending the deadline for responding to Satterlee's Motion and Brief for an Order Allowing Discovery. This motion is supported by the following brief. Counsel for Petitioners has been contacted and does not oppose this motion.

BRIEF

On August 7, 2006, this Court granted the State Fund's motion for extension of time to respond to Petitioners' request for discovery. The Court's Order extended the time for State Fund's response to August 22, 2006.

Respondents note that they have been in consultation with the State Fund and are

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considering deferring to State Fund's briefing and simply joining therein. Thus, in order to further consult and coordinate with State Fund, and determine if Respondent will join its brief, Respondents respectfully request that the extension granted to State Fund be applied to Respondents as well.

WHEREFORE, Respondents respectfully request this Court to issue an order extending the time to respond to Satterlee's Motion and Brief for an Order Allowing Discovery to August 22, 2006.

DATED this 10th day of August, 2006.

MATOVICH & KELLER, P.C.

By

Shane P/McGovern

Attorneys for Respondents/Insurers listed above

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO SATTERLEE'S MOTION AND BRIEF FOR AN ORDER ALLOWING DISCOVERY, was mailed, postage prepaid upon the following:

James G. Hunt Hunt & Molloy Law Firm 310 Broadway Helena, MT 59601

Thomas J. Murphy P O Box 3226 Great Falls, MT 59403-3226

Steven W. Jennings Crowley Law Firm P O Box 2529 Billings, MT 59103-2529

Bryce R. Floch 100 Financial Center Suite 100 P O Box 7310 Kalispell, MT 59904-7310

Respondents Unopposed Motion for Extension of Time - Page 2

Michael P. Heringer Brown Law Firm 315 North 24th Street P O Box Drawer 849 Billings, MT 59103-0849

Larry W. Jones 700 SW Higgins Avenue Suite 108 Missoula, MT 59803-1489

Bradley J. Luck Garlington, Lohn 199 West Pine P O Box 7909 Missoula, MT 59807

DATED this 10th day of August, 2006.

Billie J. Voldseth

For MATOVICH & KELLER, P.C.

MATOVICH & KELLER, P.C. Attorneys at Law

Carey E. Matovich Geoffrey R. Keller Brooke B. Murphy Shane P. McGovern Benjamin O. Rechtfertig Jacquelyn M. Hugbes

August 10, 2006

Patricia Kessner Clerk of Court Workers' Compensation Court P.O. Box 537 1625 11th Avenue Helena, Montana 59624-0537

Re:

Satterlee, et al. v. Lumberman's Mutual Casualty Company, et al.

WWC No.: 2003-0840

Dear Ms. Kessner:

Enclosed you will find the original, plus one copy, of Respondent's Unopposed Motion for Extension of Time to Respond to Satterlee's Motion and Brief for an Order Allowing Discovery, and proposed Order. The foregoing was sent, via facsimile, to the clerk's office earlier today for filing. Please return the date stamped copies to this office in the enclosed, postage prepaid envelope.

Should you have any questions regarding the foregoing, please contact me directly.

Sincerely,

Billie J. Voldseth

/bjv

Enclosures





Carey E. Matovich Geoffrey R. Keller Brooke B. Murphy Shane P. McGovern Benjamin O. Rechtfertig Jacquelyn M. Hughes

August 10, 2006

VIA FACSIMILE

Patricia Kessner Clerk of Court Workers' Compensation Court P.O. Box 537 1625 11th Avenue Helena, Montana 59624-0537

Re:

Satterlee, et al. v. Lumberman's Mutual Casualty Company, et al.

WWC No.: 2003-0840

Dear Ms. Kessner:

Attached please find a copy of Respondent's Unopposed Motion for Extension of Time to Respond to Satterlee's Motion and Brief for an Order Allowing Discovery, and proposed Order. The originals will be forwarded under separate cover today.

Should you have any questions regarding the foregoing, please feel free to contact me directly.

Sincerely,

Billie J. Voldseth

/bjv

Attachments