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FILED

JUN - 1 2006

OFFICE OF
WORKER'S COMPENSATION JUDGE
HELENA, MONTANA

ATTORNEYS FOR Trinity Universal Insurance Co. of Kansas, Trinity Universal Insurance Co., and Security National Insurance Co.

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

ROBERT FLYNN and CARL MILLER,)
Individually and on Behalf of Others)
Similarly Situated,)

Petitioners,)

v.)

MONTANA STATE FUND,)

Respondent/Insurer)

And)

LIBERTY NORTHWEST INSURANCE)
CORPORATION.)

WCC No. 2000-0222

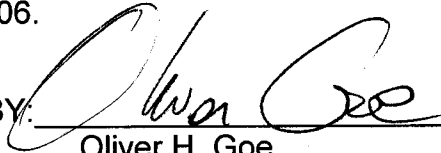
**MOTION FOR EXTENSION OF TIME
TO RESPOND TO DISCOVERY**

Trinity Universal Insurance Co. of Kansas, Trinity Universal Insurance Co. and Security National Insurance Co., have moved this Court to for an Order dismissing them from the proceedings. Following the filing of the Motion to Dismiss the Petitioners, file "Petitioner's First Discovery Request to Insurer Security National Insurance Co." Identical discovery was served on the other two Insurers referenced above. Additional time is needed to respond to the discovery request. Counsel for the Insurer contacted

DOCKET ITEM NO. 524

Mr. Palmer and he has no objection. On this basis, the Insurers are requesting an additional twenty (20) days to respond to discovery making discovery responses due on June 22, 2006.

DATED this 1 day of June, 2006.

BY: 

Oliver H. Goe

Attorneys for Respondent/Insurer

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of June, 2006, a true and correct copy of the foregoing was deposited in the United States mail, postage prepaid, and addressed as follows:

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June 1, 2006

Hand-Delivered

Workers' Compensation Court
Patricia Kessner
P.O. Box 537
Helena, MT 59624

**RE: Common Fund Workers' Compensation Cases: Flynn v. State Fund
Cause No. 2000-0222**

Dear Ms. Kessner,

Enclosed for filing in the above-referenced matter please find the original and one copy of **Motion for Extension of Time to Respond to Discovery**. Please advise me of the filing of this document by date-stamping the attached copy and returning it with our staff courier.

Should you have any questions regarding this filing, please do not hesitate to contact me. Thank you for your assistance.

Sincerely,

BROWNING, KALECZYC, BERRY & HOVEN, P.C.

By Deborah A. Anspach
Deborah Anspach
Legal Secretary to Oliver H. Goe

Enclosures



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