

**From:** [Poole, Jackie](#)  
**To:** ["Attorneys Inc., P.C."](#)  
**Cc:** [Larry Jones](#)  
**Bcc:** [Poole, Jackie](#)  
**Subject:** Flynn v. Liberty Northwest; 2000-0222  
**Date:** Wednesday, November 15, 2017 2:03:00 PM

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Counsel,

Thank you for the status update.

We will wait to hear from the parties in mid-January for an updated status report.

Thank you!

***This email correspondence will be docketed in the Court's file.***

***Jackie Poole***  
***Clerk of Court***  
***Workers' Compensation Court***  
***406-444-4667***  
***japoole@mt.gov***

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**From:** Attorneys Inc., P.C. [mailto:attorneysinc@montana.com]  
**Sent:** Wednesday, November 15, 2017 12:13 PM  
**To:** Poole, Jackie <japoole@mt.gov>  
**Cc:** Larry Jones <lwjones@willslawpc.com>  
**Subject:** Flynn v. Liberty Northwest; 2000-0222

Jackie;

Larry and I agreed that I provide this status update. We are making some progress. You will recall that Liberty did a search to identify claimants for which Liberty and its affiliates took an SSDI offset. The goal of the initial search is to identify all claimants who may be eligible for *Flynn/Miller* benefits. We anticipate that the search results would be overbroad and we would later narrow the list of claimants who are actually eligible. I then undertook a crosscheck to verify the accuracy of the insurer's search. My crosscheck has raised questions as to the accuracy of the insurer's search. Larry and I are both pursuing a verifiable search process so we can identify all eligible claimants and move this forward. Larry will present our questions and concerns to the insurer's technical staff on the

East coast and will provide their response to me. We propose to provide the Court with another status update by mid January if this is acceptable.

Sincerely,

Rex Palmer

RP:jm

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Please confirm receipt of this email with our office.

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