

Rex Palmer  
 ATTORNEYS INC., P.C.  
 301 W Spruce  
 Missoula, MT 59802  
 (406) 728-4514  
 ATTORNEYS FOR PETITIONERS

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

|  |   |                                      |
|--|---|--------------------------------------|
| <i>Robert Flynn</i> and                  | ) | WCC No. 2000-0222                    |
|  | ) |                                      |
| <i>Carl Miller</i> , Individually and on | ) |                                      |
| Behalf of Others Similarly               | ) | <b>PETITIONERS' UNOPPOSED MOTION</b> |
| Situated,                                | ) | <b>FOR AN ORDER REQUIRING ERD TO</b> |
| Petitioners,                             | ) | <b>PROVIDE LIBERTY INFORMATION</b>   |
| v.                                       | ) |                                      |
|  | ) |                                      |
| <i>Montana State Fund</i> ,              | ) |                                      |
| Respondent/Insurer,                      | ) |                                      |
| and                                      | ) |                                      |
|  | ) |                                      |
| <i>Liberty Northwest Insurance</i>       | ) |                                      |
| <i>Company</i> ,                         | ) |                                      |
| Intervenor.                              | ) |                                      |

\* \* \* \* \*

COME NOW Petitioners, Robert Flynn and Carl Miller, by and through their attorney of record, Rex Palmer, and move the Court for an Order requiring ERD to provide information concerning workers' compensation claims where Liberty Northwest Insurance Company, or any of its affiliates, were the insurer. In substance, Petitioners request the same order only for additional Liberty Affiliates which the Court entered concerning a more limited group of Liberty affiliates on September 28,

2005. Docket #372. Counsel for Liberty and its affiliates, Larry Jones, has no objection to this Motion or the attached proposed Order.

DATED this 18<sup>th</sup> day of January, 2018.



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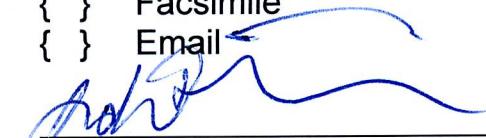
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 18<sup>th</sup> day of January, 2018, a true and correct copy of the foregoing was served upon the following by U.S. mail, hand-delivery, Federal Express, facsimile or email:

Larry Jones  
Wills Law Firm, P.C.  
323 West Pine  
Missoula, MT 59802

{ } CM/ECF  
{X} U.S. Mail  
{ } Hand Delivered  
{ } Federal Express  
{ } Facsimile  
{ } Email



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Judith Martin