



Brotherhood Mutual[™]
Insurance Company

6400 Brotherhood Way

P.O. Box 2227

Fort Wayne, IN 46801-2227

260.482.8668

Michael J. Allison, JD, CPCU
Chief Counsel and Corporate Secretary

May 16, 2005

FILED

MAY 19 2005

mallison@brotherhoodmutual.com

OFFICE OF
WORKERS' COMPENSATION JUDGE
HELENA, MONTANA www.brotherhoodmutual.com

Workers' Compensation Court
PO Box 537
Helena, MT 59624-0537

Subject: Robert Flynn v. Montana State Fund; WCC No. 2000-0222

To the Montana Workers' Compensation Court:

Our Company, Brotherhood Mutual Insurance Company, is licensed to write workers' compensation insurance in the state of Montana, but we have never issued any workers' compensation policies in the state. Accordingly, the Flynn v. Montana State Fund lawsuit would appear to have no application to our company, and we do not believe a formal response to the summons is necessary, and would propose that this letter serve as our company's response. Should the court require a response other than this letter, please advise our company. Unless we are notified otherwise, we will assume that, in light of the fact that our company has written no workers' compensation policies in the state, there will be no need for any formal response from our company.

Sincerely,

Michael J. Allison, JD, CPCU
Vice President and Chief Counsel
Brotherhood Mutual Insurance Company
PO Box 2227
Fort Wayne, IN 46801-2227