

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

WCC No. 2000-0222

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

FILED

Vs.

JUN 20 2005

MONTANA STATE FUND
Respondent/Insurer
And
LIBERTY NORTHWEST INSURANCE CORPORATION
Intervenor.

OFFICE OF
WORKER'S COMPENSATION JUDGE
HELENA, MONTANA

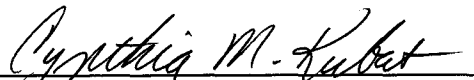
RESPONSE TO SUMMONS

COMES NOW The Protective National Insurance Company of Omaha, and herewith states the following:

1. The Protective National Insurance Company of Omaha has not written any workers' compensation insurance business in Montana on or after July 1, 1974.
2. The Protective National Insurance Company of Omaha does not have any workers' compensation claimants insured by it who would be entitled to additional benefits under the *Flynn* decision.

Based upon the above-stated facts, The Protective National Insurance Company of Omaha requests that its name be removed from the Lien Notice and from any further correspondence regarding this matter.

DATED in Omaha, Nebraska, this 16th day of June, 2005.


Cynthia M. Kubat, Secretary
THE PROTECTIVE NATIONAL
INSURANCE COMPANY OF OMAHA
11128 John Galt Blvd., Ste. 450
Omaha, NE 68137
(402) 970-8600

DOCKET ITEM NO. 227