Geoffrey C. Angel ANGEL LAW FIRM 125 West Mendenhall Bozeman, Montana 59715 (406) 586-1926

**Attorney for Petitioner** 

FILED

MAY - 9 2003

OFFICE OF WORKERS' COMPENSATION JUDUL HELENA, MONTANA

IN THE WORKERS' COMPENSATION COURT FOR THE STATE OF MONTANA

MARK MATHEWS,	) WCC Number 2001-0294
Petitioner,	) MOTION TO CONSOLIDATE
vs.	
LIBERTY NORTHWEST INSURANCE	)
CORPORATION,	)
	)
Respondent.	)

**COMES NOW** the petitioner Mark Mathews, by and through his counsel of record Geoffrey C. Angel, and moves the Court to consolidate this case and *Kelly Wild v. Montana State Compensation Insurance Fund, WCC 2001-0286* for the purposes of pursuing and administering a remedy on behalf of all others similarly situated as a Common Fund or Class Action as the Court deems appropriate under the circumstances.

Counsel for petitioner Mark Mathews has contacted counsel for respondent Liberty Northwest Insurance Corporation and he **does not object** to this motion to consolidate.

DATED this 7th day of May 2003.

ANGEL LAW HIRM

Geoffrey C. Angel

MOTION TO CONSOLIDATE; PAGE 1 OF 2.

## CERTIFICATE OF SERVICE

I hereby certify that on the  $7^{th}$  day of May 2003 I served a copy of the foregoing on Respondent by first class mail, postage prepaid, and addressed as follows:

Larry W. Jones, Senior Attorney Liberty Northwest Insurance Corporation 700 S.W. Higgins, Avenue 250 Missoula, Montana 59803-1429

Geoffrey C. Ang

ANGEL LAW FIRM

MOTION TO CONSOLIDATE; PAGE 2 OF 2.