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FILED

JUN - 3 2005

OFFICE OF
WORKERS' COMPENSATION JUDGE
HELENA, MONTANA

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

DALE REESOR,

Petitioner,

vs.

MONTANA STATE FUND,

Respondent/Insurer.

WCC No. 2002-0676

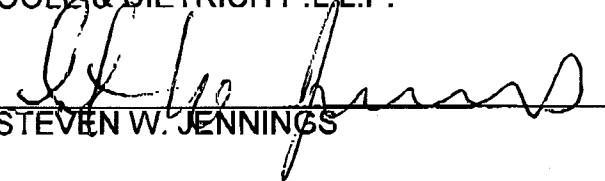
MOTION TO EXTEND DEADLINE
FOR RESPONSE

COMES NOW Respondents, Evanston Insurance Company, Everest National Ins. Co., General Security Insurance Company, General Security National Insurance Company, Markel Insurance Company, Safety National Casualty Corp., Scor Reinsurance Company, Safeco Insurance Company of Illinois, Safeco Insurance Company of America, XL Ins. Co. of New York, Inc., XL Insurance America, Inc., XL Reinsurance America, and XL Specialty Ins. Company ("*Respondents*") and move this Court for additional time to submit a response as ordered in this Court's *Summons and Notice of Attorneys' Fee Lien* dated April 22, 2005.

Respondent's national law firm, Lord, Bissell & Brook, L.L.P. has contacted Crowley, Haughey, Hanson, Toole & Dietrich, P.L.L.P. ("The Crowley Firm") to inquire as to the possibility of The Crowley Firm acting as local counsel for Respondents in the above captioned case. Lord, Bissell & Brook has advised that many of Respondents had not been served with this Court's *Summons and Notice of Attorneys' Fee Lien* and were unaware of their duty to respond and the June 6 deadline for such response. As of this date, Lord, Bissell & Brook has been unable to contact Respondents to ascertain whether they will agree to local representation by The Crowley Firm. However, anticipating that all Respondents will so agree, Lord, Bissell & Brook has requested The Crowley Firm to act as local counsel on its behalf and to move this court for an extension of the June 6 deadline. Accordingly, Respondents respectfully request that the June 6, 2005, deadline for the Response be extended until June 20, 2005. Counsel for Petitioner, Thomas Murphy, has been contacted and does not object to this motion.

Dated this 3rd day of June, 2005.


CROWLEY, HAUGHEY, HANSON,
TOOLE & DIETRICH P.L.L.P.

By: 
STEVEN W. JENNINGS

CERTIFICATE OF SERVICE

I, STEVEN W. JENNINGS, one of the attorneys for the law firm of Crowley, Haughey, Hanson, Toole & Dietrich P.L.L.P., hereby certify that on the 3rd day of June, 2005, I mailed a true and correct copy of the foregoing document, postage prepaid, to the following:

Mr. Thomas J. Murphy
Murphy Law Firm
PO Box 3226
Great Falls, MT 59403-3226


STEVEN W. JENNINGS