

1 WILLIAMS LAW FIRM, P.C.
2 WILLIAM R. BIELER, ESQ.
3 235 E. PINE, P.O. BOX 9440
4 MISSOULA, MONTANA 59807-9440
5 Tel: (406) 721-4350 Fax: (406) 721-6037
6 *Attorneys for Respondent/Insurer*

FILED

JUN - 6 2005

OFFICE OF
WORKERS' COMPENSATION JUDGE
HELENA, MONTANA

7 **IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA**

8 DALE REESOR,

9 Petitioner,

10 -vs-

11 MONTANA STATE FUND,

12 Respondent/Insurer.

WCC NO. 2002-0676

**ANSWER OF FEDERATED RURAL
ELECTRIC INSURANCE EXCHANGE
AND MONTANA ELECTRIC & TELEPHONE
POOL TO COURT'S APRIL 22, 2005 ORDER**

13 Federated Rural Electric Insurance Exchange ("Federated") and Montana
14 Electric & Telephone Pool ("METSPool") submit the following response to the Court's
15 April 22, 2005 Order.

16
17 1. Federated Rural Electric Insurance Exchange wrote workers' compensation
18 coverage in Montana from April 1, 1980 through approximately 1993. During that time
19 period, its only insured in Montana was Glacier Electric.

20 2. In 1994 Glacier Electric pooled with various other electric and telephone
21 entities and became self-insured. That organization is known as Montana Electric &
22 Telephone Pool or "METSPool." Federated is the claims administrator for METSPool.

23 3. METSPool is still writing workers' compensation coverage in Montana.

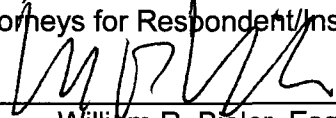
24 4. In answer to paragraph 4 of the Court's Order, Federated and METSPool
25 hereby incorporate and rely upon any defense raised by any other insurer or self-insurer

9/6

1 named in this action.

2 DATED this 3rd day of JUNE, 2005.

3 WILLIAMS LAW FIRM, P.C.
4 235 E. Pine, P.O. Box 9440
5 Missoula, Montana 59807-9440
6 (406) 721-4350 fax 721-6037
7 Attorneys for Respondent/Insurer


8 By 
9 William R. Bieler, Esq.

10 **CERTIFICATE OF SERVICE**

11 I hereby certify that on the 3rd day of JUNE, 2005, a copy of the foregoing was served
12 upon the following by Mail, Express Mail, Hand-Delivery, Fax, or Federal Express:

13 THOMAS J. MURPHY, ESQ.
14 MURPHY LAW FIRM
15 P.O. BOX 3226
16 GREAT FALLS, MT 594043-3226
17 (406) 452-2345 FAX: 406-452-2999
18 *Attorney for Plaintiff*

- 19 U.S. MAIL
- 20 EXPRESS MAIL
- 21 HAND-DELIVERY
- 22 FAX
- 23 FEDERAL EXPRESS

24 
25 Gwen Berard, Secretary

WILLIAMS LAW FIRM, P.C.

235 East Pine, P.O. Box 9440
Missoula, Montana 59807-9440
Tel: 406/721-4350
Fax: 406/721-6037

Shelton C. Williams
Mark S. Williams
Susan Moriarity Miltko
William R. Bieler
Stefan W. Farr
Amanda M. Zitzka
James D. Johnson

June 3, 2005

Patricia J. Kessner, Clerk of Court
Montana Workers Compensation Court
1625 11th Avenue
P.O. Box 537
Helena, MT 59624-0537

RE: WCC No. 2002-0676
Reesor v. Montana State Fund
WLF FILE: 7188 FUND (wrb)

Dear Ms. Kessner:

Enclosed for filing is the *Answer of Federated Rural Electric Insurance Exchange and Montana Electric & Telephone Pool to Court's April 22, 2005 Order*.

Yours truly,

WILLIAMS LAW FIRM, P.C.



William R. Bieler

BB:gb
bill@wmslaw.com
721-4350 x169

Enclosure

cc Thomas J. Murphy, Esq.