

FILED

AUG 4 2005

OFFICE OF
WORKER'S COMPENSATION JUDGE
HELENA, MONTANA

Steven W. Jennings
Crowley, Haughey, Hanson,
Toole & Dietrich P.L.L.P.
P. O. Box 2529
Billings, MT 59103-2529
(406) 252-3441
Attorneys for GENERAL SECURITY
NATIONAL INSURANCE COMPANY and
GENERAL SECURITY NATIONAL
INSURANCE COMPANY as Attorney-in-Fact
for GENERAL SECURITY INSURANCE
COMPANY

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

DALE REESOR,)	
)	
Petitioner,)	WCC No. 2002-0676
)	
vs.)	
)	MOTION FOR LEAVE TO FILE
MONTANA STATE FUND,)	RESPONSE TO SUMMONS
)	
Respondent/Insurer.)	

COMES NOW General Security National Insurance Company ("GSNIC"), by and through counsel of record, Crowley, Haughey, Hanson, Toole & Dietrich P.L.L.P., and moves this Court for an order granting it leave to file a response to the *Summons and Notice of Attorneys Fee Lien* issued in this case. Counsel advises that on June 21, 2005, it filed a *Motion to Dismiss* on behalf of certain respondents, including General Security Insurance Company¹ and SCOR Reinsurance Company (Document # 237 on this Court's *Reesor Website*). In filing Document # 237, counsel intended to include GSNIC as a listed Movant, but inadvertently omitted it therefrom. Accordingly, GSNIC requests that this Court issue an order permitting it to file the attached *Motion to Dismiss*. Counsel for Petitioner, Tom Murphy, has been notified of this motion and does not object.

¹ Counsel further advises the Court that GSNIC is also the Attorney-in-Fact for respondent General Security Insurance Company.

Dated this 31 day of August, 2005.

CROWLEY, HAUGHEY, HANSON,
TOOLE & DIETRICH P.L.L.P.
Attorneys for GENERAL SECURITY
NATIONAL INSURANCE COMPANY

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 31 day of August, 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

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

ATTORNEYS AT LAW

500 TRANSWESTERN PLAZA II • 490 NORTH 31ST STREET • BILLINGS, MONTANA 59101
P.O. Box 2529 • BILLINGS, MONTANA 59103-2529
TEL (406) 252-3441 • FAX (406) 252-5292
www.crowleylaw.com

STEPHEN M. BARRETT
COLBY L. BRANCH * #
KATY A. BRANDIS
ALAN C. BRYAN #
ASHLEY BURLESON
DAVID L. CHARLES
PAUL C. COLLINS
GARY M. CONNELLEY
RENEE L. COPPOCK
MARCIA J. DAVENPORT
JASON A. DELMUE
MICHAEL S. DOCKERY
JOHN B. DUDIS, JR.
JON T. DYRE #
MARY SCRIM DYRE
SCOTT A. FISK
BRUCE A. FREDRICKSON *
MICHAEL W. GREEN

ROBERT C. GRIFFIN
PETER F. HABEIN
SCOTT D. HAGEL
NATHAN S. HANEY
KEVIN P. HEANEY
KENNETH G. HEDGE *
JAMES R. HINTZ
BRIAN HOLLAND
LARRY A. HOLLE
STEVEN W. JENNINGS
DANIEL D. JOHNS
DARIN W. JOHNSON
JOEL L. KALEVA
ALLAN L. KARELL
KIELY S. KEANE
PETER M. KIRWAN
WILLIAM D. LAM DIN III
MICHAEL J. LANSING #

KENNETH K. LAY
JOHN R. LEE *
JARED M. LE FEVRE
STEVEN J. LEHMAN
JULIE A. LICHTF
DENISE D. LINFORD #
JASON P. LOBLE
CHRIS MANGEN, JR.
WILLIAM J. MATTIX
JOE C. MAYNARD, JR.
JOHN H. MAYNARD
JOSEPH P. MAZUREK
IAN McINTOSH
DANIEL N. McLEAN
MATTHEW F. McLEAN #
ROBERT G. MICHELOTTI, JR.
STEVEN R. MILCH
KIMBERLY S. MORE

DONALD R. MURRAY, JR.
KRISTIN L. OMVIG
JEFFERY J. OVEN #
SHANE D. PETERSON *
HERBERT I. PIERCE III
FRED C. RATHERT *
STEVEN P. RUFFATTO
GINA S. SHERMAN
SCOTTI M. SHINGLETON
JAMES P. SITES
GARTH H. SJUE *
LEONARD H. SMITH
CHRISTOPHER C. VOIGT #
DAVID M. WAGNER
NEIL G. WESTESEN
BRYAN P. WILSON
RONALD E. YOUDE

RETIRED
JAMES M. HAUGHEY
BRUCE R. TOOLE

OF COUNSEL
GEORGE C. DALTHORP
JOHN M. DIETRICH
DAVID L. JOHNSON
GARELD F. KRIEG
ARTHUR F. LAMEY, JR.
LOUIS R. MOORE *
MYLES J. THOMAS
FRED E. WHISENAND *

OFFICES
100 NORTH PARK AVENUE
SUITE 300, P.O. BOX 797
HELENA, MT 59624-0797
PHONE (406) 449-4165

111 EAST BROADWAY
P.O. BOX 1206
WILLISTON, ND 58802-1206
PHONE (701) 572-2200

431 FIRST AVENUE WEST
P.O. BOX 759
KALISPELL, MT 59903-0759
PHONE (406) 752-6644

45 DISCOVERY DRIVE
SUITE 200, P.O. BOX 10969
BOZEMAN, MT 59719-0969
PHONE (406) 556-1430

700 S.W. HIGGINS
SUITE 200
MISSOULA, MT 59803
PHONE (406) 829-2732

Attorneys are licensed in Montana unless otherwise noted; * also licensed in North Dakota, # also licensed in Wyoming, + not licensed in Montana

August 3, 2005

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

RE: *Dale Reesor vs. Montana State Fund*
WCC No. 2002-0676

Dear Clerk:

On behalf of General Security National Insurance Company, please file the enclosed Motion for Leave to File Response to Summons and present the proposed Order to Judge McCarter. Once entered, please file the Motion to Dismiss and Supporting Brief in the above-referenced matter.

Thank you in advance for your assistance.

Sincerely yours,

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

Myrna Henschel, PLS

Myrna Henschel, Certified PLS
Legal Secretary to Steven W. Jennings

mlh
Enclosures