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FILED

DEC - 1 2005

OFFICE OF
 WORKERS' COMPENSATION JUDGE
 HELENA, MONTANA

Attorneys for Midwest Employers Casualty Company

IN THE WORKERS' COMPENSATION COURT
 STATE OF MONTANA

DALE REESOR,)	
)	
Petitioner,)	
)	WCC No. 2002-0676
-vs-)	
)	
MONTANA STATE FUND,)	AFFIDAVIT OF LEO WINSTEAD
)	
Respondent/Insurer.)	

STATE OF MISSOURI)
 : ss.
 County of St. Louis)

I, Leo Winstead, being first duly sworn, depose and sayeth as follows:

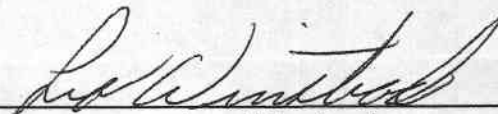
1. That I am the Vice President, Claims of Midwest Employers Casualty Company.
2. That I am authorized to make this Affidavit on behalf of Midwest Employers Casualty Company.
3. That I have personal knowledge of the matters set forth in this Affidavit.

1. AFFIDAVIT OF LEO WINSTEAD

4. That Midwest Employers Casualty Company had opened a total of 60 claim files for workers' compensation claims in Montana. That all but one of those 60 claim files were closed without any payment by Midwest Employers Casualty Company. That the one claim file that involved payment was not covered by the terms of the Summons and Amended Notice of Attorney Lien filed April 22, 2005.

Further Affiant sayeth not.

DATED this 18 day of November, 2005.



Leo Winstead

Subscribed and sworn to before me this 18 day of November, 2005.

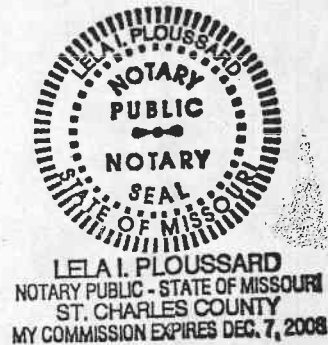


(signature)

Lela I. Ploussard

(print name)

Notary Public for the State of MO
Residing at St Charles, MO
My Commission Expires: 12-7-08



LAW OFFICES OF
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MATTHEW D. NEILL

OF COUNSEL
ROBERT A. POORE
URBAN L. ROTH

JAMES A. POORE, JR.
(1916-2002)

November 30, 2005

Patricia J. Kessner
Montana Workers Compensation Court
1625 11th Avenue
P. O. Box 537
Helena, Montana 59624

Re: *Robert Flynn, et al. v. Continental Western Insurance, et al.*
WCC No. 2000-0222

Dale Reesor v. Montana State Fund
WCC No. 2002-0676

Dear Ms. Kessner:

Enclosed for filing in the above-captioned matters are the following:

Flynn v. Continental Western Insurance, et al.

1. Affidavit of John F. Thelen (Union Insurance Company);
2. Affidavit of John F. Thelen (Continental Western Insurance Company);
3. Affidavit of John F. Thelen (Berkley Regional Insurance Company);
4. Affidavit of John F. Thelen (American West Insurance Company);
5. Affidavit of Carol J. LaPunzina (StarNet Insurance Company); and
6. Affidavit of Leo Winstead (Midwest Employers Casualty Company).

Reesor v. Montana State Fund

1. Affidavit of John F. Thelen (Union Insurance Company);
2. Affidavit of John F. Thelen (Continental Western Insurance Company);
3. Affidavit of John F. Thelen (Berkley Regional Insurance Company);
4. Affidavit of John F. Thelen (American West Insurance Company);
5. Affidavit of Carol J. LaPunzina (StarNet Insurance Company); and
6. Affidavit of Leo Winstead (Midwest Employers Casualty Company).

November 30, 2005

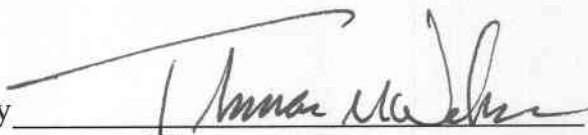
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Please file the Affidavits in support of our Responses to Summons and Notice of Attorney Fee Lien, both of which were filed June 29, 2005.

Thank you for your cooperation.

Very truly yours,

POORE, ROTH & ROBINSON, P.C.

By 
Thomas M. Welsch

TMW:pl
Enclosures