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**FILED**

**JUL 13 2005**

OFFICE OF  
WORKERS' COMPENSATION JUDGE  
HELENA, MONTANA

IN THE WORKERS' COMPENSATION COURT  
FOR THE STATE OF MONTANA

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CATHERINE E. SATTERLEE, et al.,	)	WCC No. 2003-0840
	)	
Petitioners,	)	
	)	
- vs. -	)	
	)	
LUMBERMAN'S MUTUAL CASUALTY	)	
COMPANY, et al.,	)	
	)	
Respondents/Insurers.	)	
	)	

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**MOTION OF MONTANA CHAMBER OF COMMERCE PURSUANT TO A.R.M.  
24.5.309 TO INTERVENE FOR PURPOSE OF FILING AMICUS BRIEF**

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The Montana Chamber of Commerce, through counsel, hereby moves this Court to exercise its discretion and enter an order allowing the Chamber to intervene in this case for the sole purpose of providing the Court with an *amicus curiae* brief on the legal issues presented by the motion for partial summary judgment filed by Petitioner Satterlee. This motion is made pursuant to the Court's administrative rules, and in particular, A.R.M. 24.5.309.

DOCKET ITEM NO. 211

The intervention is sought for the purpose of allowing the Chamber to provide its voice on behalf of its membership on the important legal questions raised by Petitioner Satterlee's motion, including the constitutionality of Mont. Code Ann. § 39-71-710. The issues presented by Satterlee's motion could have tremendous financial impact upon all employers, employees, and taxpayers of this State. Therefore, the Court should benefit from having wide input from those who will potentially be affected by the Court's ultimate decision.

DATED this 12th day of July, 2005.

PHILLIPS & BOHYER, P.C.  
Attorneys for Montana Chamber of  
Commerce

By   
John E. Bohyer

CERTIFICATE OF SERVICE

I, the undersigned, a representative of the law firm of Phillips & Bohyer, P.C., hereby certify that on this 12<sup>th</sup> day of July, 2005, I served the original "**Motion of Montana Chamber of Commerce Pursuant to A.R.M. 24.5.309 to Intervene for Purpose of Filing Amicus Brief**" by depositing the same in the United States Mail, postage prepaid thereon, addressed as follows:

Ms. Patricia J. Kessner  
Clerk of Court  
Workers' Compensation Court  
PO Box 537  
Helena, MT 59624-0537

and a true and complete copy of the same to the following:

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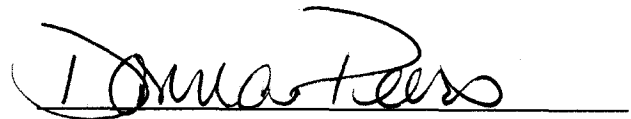
- and -

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A handwritten signature in cursive script, appearing to read "Donna Fess", is written over a horizontal line.