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FILED

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OFFICE OF
WORKERS' COMPENSATION JUDGE
HELENA, MONTANA

Attorneys for Petitioners

**IN THE WORKERS' COMPENSATION COURT
FOR THE STATE OF MONTANA
WC COURT NO. 2003-0840**

CATHERINE E. SATTERLEE, Petitioner, vs. LUMBERMAN'S MUTUAL CASUALTY COMPANY, Respondent/Insurer for BUTTREY FOOD & DRUG, Employer.	WC Claim No.: 788CU041791
JAMES ZENAHLIK, Petitioner, vs. MONTANA STATE FUND, Respondent/Insurer for EAGLE ELECTRIC, Employer.	WC Claim No.: 03-1997-06362-9
JOSEPH FOSTER, Petitioner, vs. MONTANA STATE FUND, Respondent/Insurer for ALLEN ELECTRIC, Employer.	WC Claim No.: 3-95-17425-3
DORIS BOWERS, Petitioner, vs. PUTMAN & ASSOCIATES, Adjusters for ROYAL & SUNALLIANCE, Respondent/Insurer for TIDYMANS, Employer.	WC Claim No.: 290044312000

DOCKET ITEM NO. 306

**SATTERLEE'S REPLY TO RESPONDENTS' BRIEFS IN
OPPOSITION TO SOUTHERLY'S MOTION FOR RECONSIDERATION**

INTRODUCTION

Simply stated, Southerly's argument for reconsideration is: Satterlee proposed uncontroverted facts. Respondents agreed with these facts thus giving this Court a basis for summary judgment in favor of Satterlee. Respondents proposed uncontroverted facts. Satterlee challenged these facts and should therefore be allowed discovery.

BACKGROUND

Petitioner Satterlee was age 57 at the time of her injury in 1992. She now receives Social Security retirement benefit ("SARI") at a monthly rate below the poverty level. Normally, a woman like Satterlee would be able to keep working to supplement her SARI benefit. However, with her work injury, Satterlee lost her ability to work after age 65. Therefore, Satterlee requested ongoing PTD benefits.

Applying §39-71-710, MCA, the State Fund refused to pay ongoing PTD because Satterlee is over the age of 65. Without that age limitation, however, Satterlee would be entitled to ongoing PTD. Therefore, Satterlee argues that but for her age alone, she would receive ongoing PTD.

Satterlee contended that the large disparity in benefit entitlement was a violation of her right to equal protection. She cites Montana's public policy, which requires PTD to "bear a reasonable relationship to the actual wages lost." She argued that the Legislature discarded that formula in §39-71-710, MCA. As such, Satterlee said that the Legislature contravened its own public policy for PTD.

The Insurers argued that a worker ends her wage earning years when she reaches retirement age, but that assumption is erroneous. Thousands of elderly people are living proof that many must continue to work to survive. In this action, Satterlee contended that she is entitled to PTD because she lost the ability to earn a future wage. Before her injury, Satterlee had the ability to earn a post-retirement wage, but she lost that to this injury. There is no other societal protection that pays for that loss except workers' compensation.

Finally, Satterlee reminded the Court that she was not seeking her "real" damages. As an injured worker, Satterlee surrendered her claim for common law damages in exchange for workers' compensation benefits. Therefore, this is SOUTHERLY's exclusive remedy under Montana law. Satterlee contends that denying a claimant full PTD (because she is old), undermines the "*quid pro quo*" premise that supports the exclusive remedy doctrine. The requisite "*quid pro quo*" is absent in the case at bar because §39-71-710, MCA, strips Satterlee of her PTD entitlement.

ARGUMENT

In Satterlee's Reply Brief In Support of Motion for Partial Summary Judgment, she strenuously disputed the Respondents' factual assertions and affidavits. Nevertheless, Satterlee submitted the case to the Court upon the belief that the Court could decide in her favor based upon undisputed facts that all Respondents conceded. Therefore, it is important to note that *only* Satterlee's facts were undisputed. This is important because Respondents argue that the parties agreed on all the facts. The record before this Court clearly shows Respondents' contention is erroneous.

Respondents would have this Court believe that Satterlee's Motion for Partial Summary Judgment is unique and should be treated differently than other motions for summary judgment. There is nothing unique about the fact that Satterlee moved for summary judgment. The Court denied the motion; therefore, Satterlee should be allowed to undertake discovery.

If this Court denies Satterlee's motion seeking discovery, the Court will, as a practical effect, have granted Respondents' motion for summary judgment. Moreover, it will have done so without giving Satterlee the opportunity to discover the validity of the facts presented by Respondents, which Satterlee has consistently argued were exaggerated. Currently, for the purposes of the Court record, the cost of Satterlee is unknown.

On their face, Satterlee believes that the Respondents have offered exaggerated estimates. It is apparent from the Respondents' motions, particularly the State Fund's motion, that they do not want to reveal the actual cost of the Satterlee case. As detailed below, a cursory look at these facts explains why Respondents are afraid to have these facts scrutinized. Satterlee asks this Court for the opportunity to discover and prove that the actual costs of this case are much lower than the Respondents' estimate. Stated in procedural terms, this Court should not grant Respondents' Motions for Summary Judgment when Satterlee has challenged the Respondents' unsupported claim that this case disrupts the "financial viability of the workers' compensation system."

RESPONDENTS EXAGGERATE THE COST OF SATTERLEE

The Respondents, and particularly the State Fund, have presented huge cost figures in their affidavits. However, as explained below, Satterlee has consistently argued that the Respondents greatly exaggerated the costs of the case. Because of those exaggerations, Satterlee asked for her venerated right to conduct discovery to prove that the Respondents' figures are overstated. It is a fundamental premise of law that Satterlee should have the opportunity to challenge the Respondents' alleged costs.

An example of the liberties taken by Respondent State Fund is found in the "Second Affidavit of Daniel Gengler." In his second affidavit, Mr. Gengler purports to estimate the overall cost of Satterlee. Mr. Gengler did not use sound economic principles to reach his conclusions.

For example, Mr. Gengler used the payout amount when valuing the State Fund PTD claims. For the "Midpoint Estimate," Mr. Gengler asserted that a 50-year-old PTD claimant would cost \$365,821.00. Mr. Gengler multiplied the number of benefit years (15.6) by the weekly permanent total rate (\$450.41). Mr. Gengler claimed there would be 56.2 PTD claimants

in 2005, so he argued that the State Fund's cost would be \$20,600,000.00 (56.2 multiplied by \$365,821.00 = \$20,559,140.00).

Mr. Gengler's illusory amounts overstate the present value of the State Fund PTD claims. Mr. Gengler's affidavit assumes the Satterlee benefits will begin in 2005, but that is not true. In fact, Mr. Gengler should have calculated the present value of PTD payments, which do not begin for 16 years. With this one unacceptable calculation, Mr. Gengler more than doubled the present value of the 2005 PTD claims. (*See attached* Second Affidavit of David Johnson, CPA, ¶¶2,3, & 4 and Schedule 1). This is not the only exaggeration by the State Fund that is factually disputed by Satterlee.

There are other examples of the liberties taken by Respondent State Fund. For example, Gengler's affidavit uses the only the longer life expectancy for females when doing his calculations rather than including the shorter life expectancy for males. (*See* Second Affidavit of Johnson, ¶6). Gengler also generally uses the highest PTD rate for each calculation. Satterlee believes Gengler's calculations likely include settled claims in the estimate of future cost (which are not actionable pursuant to *Dempsey*).

This Court has observed the Respondents' documented tendency toward exaggeration. In *Stavenjord*, the Workers' Compensation Court found that the State Fund exposure estimate was a "worst case scenario," and "not a realistic estimate." *Stavenjord* 2004 MTWCC 62, ¶ 30.

Significantly, the Respondents' admit that the number of claims is unknown. As observed by Mr. Johnson in his affidavit attached to Satterlee's Reply brief:

Christine E. McCoy indicated that a Satterlee review will have to identify claimants who may be affected by the decision and may include the review of a claim file with information stored on all media types. According to Ms. McCoy, claimants can be substantially identified by using complex computer queries to search the CMS and DB02 systems and that manually reviewing each file may be the only way of identifying affected claims. It is my opinion that these admissions by Ms. McCoy probably show that some or all of the damages claimed by the State Fund are based solely on estimates without a sufficient factual basis.

(Petitioner's Reply Brief, p. 13).

These tactics bring into question all of the "facts" set forth by Respondents, including the number of PTD claimants per year, a number which is critical to the real cost of Satterlee. This Court should allow Satterlee to prove that the Respondents have exaggerated the real cost of the case. Discovery would force the Respondents to identify the truth instead of allowing them to make unrealistic estimates.

Satterlee still believes cost is irrelevant when determining an equal protection violation; however, this Court's reasoning suggests that cost is important. Therefore, Satterlee asks the Court to allow her to present the true costs after discovery. In reality, cost is the only distinguishing factor between *Reesor* and *Satterlee*. In *Reesor*, the Montana Supreme Court held

that it was a denial of equal protection to deny PPD benefits after age 65. Other than cost, there is no difference between PPD and PTD for equal protection purposes.

Prior to *Reesor*, the Legislature decided that injured workers were not eligible for PPD benefits after age 65. *Reesor* held this denied equal protection and was unconstitutional. There is no equal protection difference in the Legislature's determination that injured workers are not eligible for PPD after age 65 than eligibility for PTD benefits after age 65. The only difference is cost.

Given the Respondents' overstated estimates, this Court should allow Satterlee to conduct discovery. Respondents argue that a favorable decision to Satterlee would be too expensive for the State of Montana. However, an unfavorable decision to Satterlee would likely leave injured elderly workers below the poverty level. This case is too important to Montana's injured workers to allow the Respondents to hide behind inflated numbers.

SATTERLEE COMPLIED WITH WORKERS' COMPENSATION COURT RULES

Respondents claim that Satterlee did not comply with MWCCR prior to the Court's decision. However, Respondents ignore Petitioners' Reply to Motion for Summary Judgment. Generally, with a motion for summary judgment, the moving party sets forth facts that she believes are undisputed. The responding party has the opportunity to dispute or agree with those facts. Here, Respondents agreed with the facts presented by Satterlee. Thus, because Satterlee's facts were undisputed, this Court had the opportunity to decide whether they were sufficient to grant summary judgment. If not, the Court should have simply denied Satterlee's motion for summary judgment and let discovery proceed as requested by Satterlee in her Reply Brief.

In the Montana State Fund's Answer Brief in Opposition to Satterlee's Motion for Partial Summary Judgment and Brief in Support of Cross-Motion for Partial Summary Judgment, the State Fund made a cross-motion for summary judgment. Although the State Fund attempted to fashion the facts it chose as "undisputed," Satterlee would not agree because they were clearly overstated. Instead, Satterlee disputed the facts as presented by the State Fund and other Respondents. (See pages 11-15 of Satterlee's Reply Brief and incorporated by reference herein). Because these facts were and remain disputed, the Court should allow discovery so Satterlee has the opportunity to determine whether Respondents' claims about the cost of Satterlee are accurate.

In Petitioners' Reply Brief, Satterlee challenged the costs presented by Respondents. For example, Satterlee stated as follows:

Although couched in different language, all of Respondents arguments are about money and cost. There are three reasons these economic arguments should not be adopted.

1. First, the Montana Supreme Court has held that cost alone cannot justify violation of equal protection.
2. Second, none of the affidavits provided by Respondents provides legally sufficient facts that this Court can consider.
3. Third, although Respondents have not provided sufficient facts to determine cost, the costs presented by Respondents are not supported by

the evidence and appear significantly overstated and are therefore not “uncontroverted.”

(Petitioner's Reply Brief In Support of Motion for Partial Summary Judgment, p. 10).

Respondents' claim that Satterlee did not follow the MWCCR, particularly Rule 24.5.328, and therefore cannot now bring a Motion for Reconsideration and request discovery. However, Satterlee cited this rule three times, including in her Reply brief arguing that the costs presented in Respondents' affidavits are inaccurate. (See pages 11-15 of Satterlee's Reply brief). In concluding this argument in her Reply brief, Satterlee clearly challenges Respondents' affidavits and requests discovery in the event Satterlee's Motion for Partial Summary Judgment is denied:

However, if this Court is going to consider the “sky is falling” economic argument set forth by the Respondents, then Petitioners request this Court allow them to discover the basis of Respondents' claims about the financial impact of Satterlee. See Rule 56(d), M.R.Civ.P., and Rule, 24.5.328(8), MWCCR. Petitioners moved for summary judgment without discovery because Petitioners' facts cannot be reasonably controverted, and Reesor is clear that PTD benefits and rehabilitation benefits cannot be distinguished from PPD benefits in §39-71-710, MCA. However, if the Court intends to consider the economic impact of this case, Petitioners' will challenge the “uncontroverted facts” because Petitioners cannot agree they are accurate. Therefore, the State Fund's Cross-Motion for Partial Summary Judgment should not be granted without discovery being undertaken.

(*Id.*, p. 15).

As her Reply brief shows, Satterlee challenged all of Respondents' “uncontroverted” facts and requested discovery on those facts prior to the Court's decision.

CONCLUSION

Although Satterlee argued to the Court that undisputed facts existed on which this Court could decide summary judgment, the undisputed facts were limited to those proposed by Satterlee and undisputed by Respondents. Satterlee believes the Respondents' costs are exaggerated and seeks the opportunity to prove this through discovery. Therefore, Satterlee requests that this Court set aside the part of its order certifying this case for appeal and issue a scheduling order, including discovery deadlines.

DATED this 1 day of February, 2006.

HUNT LAW FIRM

BY: 

JAMES G. HUNT

Attorney for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of February, 2006, I served a copy of the foregoing **SATTERLEE'S REPLY TO RESPONDENTS' BRIEFS IN OPPOSITION TO SATTERLEE'S MOTION FOR RECONSIDERATION**, on the following:

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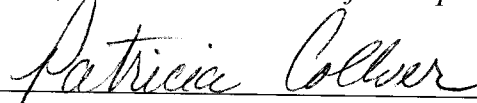
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**IN THE WORKERS' COMPENSATION COURT
FOR THE STATE OF MONTANA
WC COURT NO. 2003-0840**

<p>CATHERINE E. SATTERLEE, Petitioner, vs. LUMBERMAN'S MUTUAL CASUALTY COMPANY, Respondent/Insurer for BUTTREY FOOD & DRUG, Employer.</p>	<p>WC Claim No.: 788CU041791</p>
<p>JAMES ZENAHLIK, Petitioner, vs. MONTANA STATE FUND, Respondent/Insurer for EAGLE ELECTRIC, Employer.</p>	<p>WC Claim No.: 03-1997-06362-9</p>
<p>JOSEPH FOSTER, Petitioner, vs. MONTANA STATE FUND, Respondent/Insurer for ALLEN ELECTRIC, Employer.</p>	<p>WC Claim No.: 3-95-17425-3</p>
<p>DORIS BOWERS, Petitioner, vs. PUTMAN & ASSOCIATES, Adjusters for ROYAL & SUNALLIANCE, Respondent/Insurer for TIDYMANS, Employer.</p>	<p>WC Claim No.: 290044312000</p>

SECOND AFFIDAVIT OF DAVID JOHNSON, CPA

STATE OF MONTANA)
): ss.
County of Lewis & Clark)

DAVID JOHNSON, being first duly sworn upon his oath, deposes and says:

1. I have read the Second Affidavit of Mr. Daniel Gengler dated October 5, 2005. Included in the Affidavit were schedules that computed a low estimate, a midpoint estimate and high estimate results. At the request of Mr. James Hunt, I was asked to conduct an analysis of Daniel Gengler's midpoint estimate which showed the cost to the Old and New Funds to be \$266 million.

2. To test Mr. Gengler's computation, I selected the 2005 group cost, shown in the amount of \$20,600,000. This is the rounded result of multiplying 56.2 PT claims by a weighted average post-retirement PT rate of \$450.41 times 52.14 weeks times 15.6 years (\$20,589,223). This computation is shown at the top of Schedule 1 and results in a per individual cost of \$366,023, which approximates Mr. Gengler's per individual cost of \$365,821.

3. I next attempted to duplicate Mr. Gengler's results using present value/time value of money theory which is the generally accepted method for valuing future cash flows. This computation is made at Schedule 2. To approximate Mr. Gengler's results, I had to assume that payments would commence immediately (rather than in 2022). I also had to assume a 0% interest rate even though long-term US Treasury are yielding approximately 4.6%. By making these assumptions, I computed the present value to be approximately that computed by Mr. Gengler (\$365,023).

4. To correctly compute the present value of the 2005 group of PTs, I assumed a benefit growth rate of 3% as did Mr. Gengler in his midpoint scenario. I also assumed that payments would start when the recipient reached age 66.1. This was based on Mr. Gengler's assumption that the average life expectancy of a recipient was 81.7 years and the recipient would receive 15.6 years of payments (age 81.7 less 15.6 years equals age 66.1). I assumed a risk-free interest rate of 5.5%. I used this assumption because interest rates are currently at a forty-year low and the fact that Mr. Gengler used a generous 3% COLA rate. The present value of per PT recipient was computed to be \$161,475 at Schedule 3. We compared our results to Mr. Gengler's results at Schedule 1.

5. We computed the present value of the 2005 group to be \$9,075,000 (56.2 times \$161,475, rounded) versus the \$20,600,000 computed by Mr. Gengler, an overstatement of cost of \$11,525,000 for this one group. Mr. Gengler's computation included 24 groups.

6. Mr. Gengler's computations assume an average life expectancy of 81.7 years for persons aged 50 years in 2005. This life expectancy is for females. Males have a lower life expectancy. If the number of male and female PTs for 2005 are identified and used in the 2005 calculation, this would reduce Mr. Gengler's cost estimate further.

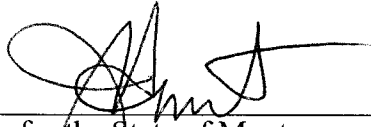
I declare under the penalty of perjury that the foregoing is a true and correct statement to the best of my knowledge.

DATED this 1st day of February, 2006.

ANDERSON ZURMUEHLEN & CO., P.C.

BY: 
DAVID JOHNSON, CPA

SUBSCRIBED AND SWORN TO before me this 1 day of February, 2006.



Notary Public for the State of Montana
Residing at Helena, Montana
My Commission Expires: 11/16/07

(NOTARIAL SEAL)

Satterlee, et al. v. Montana State FundPer Daniel Gengler Affidavit:

	<u>Entire Field</u>	<u>One 50 Year-Old PT</u>
Non-settled PT cases per year	56.2	1
Accident years	<u>1</u>	<u>1</u>
	56.2	1.0
Average annual PT benefits	<u>\$23,463</u>	<u>\$23,463</u>
	\$1,318,621	\$23,463
Average lifespan after SS retirement benefit	<u>15.6</u>	<u>15.6</u>
Total	<u><u>\$20,570,481</u></u>	<u><u>\$366,023</u></u>

Comparison of Results:

Present value per Mr. Gengler	\$ 365,821
Actual present value, 44% of Mr. Gengler's results (Schedule 3)	<u>161,475</u>
Overstatement of present value dollars by Mr. Gengler	<u><u>\$ 204,346</u></u>
Percent overstatement by Mr. Gengler	<u><u>227%</u></u>

Satterlee, et al. v. Montana State FundComputation of Present Value of 50 Year-Old PT Benefits in 2005, MSF Method:

Interest rate	0.0%
Benefit growth rate	3.0%
Net discount rate	<u>-3.0%</u>

<u>Year</u>	<u>Age</u>	<u>Cumulative Time</u>	<u>Annual Benefit Amount</u>	<u>Annual Benefit</u>	<u>Present Value Factor</u>	<u>Present Value</u>
2005	50	0	\$ 18,476	18,476	1.0000	18,476
2006	51	1	19,031	19,031	1.0000	19,031
2007	52	2	19,602	19,602	1.0000	19,602
2008	53	3	20,190	20,190	1.0000	20,190
2009	54	4	20,795	20,795	1.0000	20,795
2010	55	5	21,419	21,419	1.0000	21,419
2011	56	6	22,062	22,062	1.0000	22,062
2012	57	7	22,724	22,724	1.0000	22,724
2013	58	8	23,405	23,405	1.0000	23,405
2014	59	9	24,107	24,107	1.0000	24,107
2015	60	10	24,831	24,831	1.0000	24,831
2016	61	11	25,576	25,576	1.0000	25,576
2017	62	12	26,343	26,343	1.0000	26,343
2018	63	13	27,133	27,133	1.0000	27,133
2019	64	14	27,947	27,947	1.0000	27,947
2020	65	15	28,786	17,271	1.0000	17,271
2021	66	16	29,649	-	1.0000	-
2022	67	17	30,539	-	1.0000	-
2023	68	18	31,455	-	1.0000	-
2024	69	19	32,398	-	1.0000	-
2025	70	20	33,370	-	1.0000	-
2026	71	21	34,371	-	1.0000	-
2027	72	22	35,403	-	1.0000	-
2028	73	23	36,465	-	1.0000	-
2029	74	24	37,559	-	1.0000	-
2030	75	25	38,685	-	1.0000	-
2031	76	26	39,846	-	1.0000	-
2032	77	27	41,041	-	1.0000	-
2033	78	28	42,273	-	1.0000	-
2034	79	29	43,541	-	1.0000	-
2035	80	30	44,847	-	1.0000	-
2036	81	31	46,192	-	1.0000	-
2037	82	32	47,578	-	1.0000	-
Total				<u>\$ 360,911</u>		<u>\$ 360,911</u>
Total per above				\$ 360,911		-
Average annual PT benefit				23,135.32		-
Divide by 52.14 weeks, weekly benefit				443.72		-
Per Mr. Gengler's Affidavit				450.41		365,821
Difference, immaterial (1.5%)				<u>\$ 6.69</u>		<u>\$ 4,910</u>

Satterlee, et al. v. Montana State FundComputation of Present Value of 50 Year-Old PT Benefits in 2005 Using Generally Accepted Method:

Interest rate	5.5%
Benefit growth rate	3.0%
Net discount rate	<u>2.5%</u>

<u>Year</u>	<u>Age</u>	<u>Cumulative Time</u>	<u>Annual Benefit Amount</u>	<u>Annual Benefit</u>	<u>Present Value Factor</u>	<u>Present Value</u>
2005	50	0	\$ 18,476	-	1.0000	\$ -
2006	51	1	19,031	-	0.9479	-
2007	52	2	19,602	-	0.8985	-
2008	53	3	20,190	-	0.8516	-
2009	54	4	20,795	-	0.8072	-
2010	55	5	21,419	-	0.7651	-
2011	56	6	22,062	-	0.7252	-
2012	57	7	22,724	-	0.6874	-
2013	58	8	23,405	-	0.6516	-
2014	59	9	24,107	-	0.6176	-
2015	60	10	24,831	-	0.5854	-
2016	61	11	25,576	-	0.5549	-
2017	62	12	26,343	-	0.5260	-
2018	63	13	27,133	-	0.4986	-
2019	64	14	27,947	-	0.4726	-
2020	65	15	28,786	-	0.4479	-
2021	66	16	29,649	-	0.4246	-
2022	67	17	30,539	27,484.70	0.4024	\$ 11,061
2023	68	18	31,455	31,454.72	0.3815	11,999
2024	69	19	32,398	32,398.36	0.3616	11,715
2025	70	20	33,370	33,370.31	0.3427	11,437
2026	71	21	34,371	34,371.42	0.3249	11,166
2027	72	22	35,403	35,402.56	0.3079	10,901
2028	73	23	36,465	36,464.64	0.2919	10,643
2029	74	24	37,559	37,558.58	0.2767	10,391
2030	75	25	38,685	38,685.33	0.2622	10,145
2031	76	26	39,846	39,845.89	0.2486	9,904
2032	77	27	41,041	41,041.27	0.2356	9,670
2033	78	28	42,273	42,272.51	0.2233	9,440
2034	79	29	43,541	43,540.68	0.2117	9,217
2035	80	30	44,847	44,846.90	0.2006	8,998
2036	81	31	46,192	46,192.31	0.1902	8,785
2037	82	32	47,578	33,304.66	0.1803	6,004
				<u>\$ 598,235</u>		<u>\$ 161,475</u>
Total						