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

WCC No. 2003-0840

CATHERINE E. SATTERLEE, et al.

Petitioner

vs.

LIBERTY NORTHWEST INSURANCE CORPORATION

Respondent/Insurer.

LIBERTY'S CROSS MOTION FOR PARTIAL SUMMARY JUDGMENT

On April 19, 2005 this Court filed its Notice of Opportunity to Appear and Intervene. On or about June 20, 2005 Liberty Mutual filed its Notice of Appearance and Intent to Intervene listing the Liberty Mutual Insurance Group Companies that were intervening.

On or about February 28, 2005 Petitioners filed their Petitioners' Motion for Partial Summary Judgment. On or about August 28, 2005 Liberty filed its Brief in Opposition to the Motion for Partial Summary Judgment. The State Fund filed its Brief in Opposition to Petitioner's Motion for Partial Summary Judgment and Brief in Support of Cross Motion for Partial Summary Judgment on or about August 8, 2005.

In this pleading Liberty incorporates by reference the State Fund's arguments in support of its Cross Motion for Partial Summary Judgment and moves for Partial Summary Judgment for the reasons set forth in the State's Motion and for the reasons Liberty set forth in its Brief in Opposition to Motion for Partial Summary Judgment filed August 8, 2005.

DOCKET ITEM NO. 324

The intent of this Motion is to bring the Liberty Mutual Insurance Group Companies expressly within the ambit of this Court's Order Denying Motion for Partial Summary Judgment filed on December 12, 2005.

If Liberty Mutual Insurance Group Companies are already within its ambit under the reference to "et al" in the caption, then the intent of this Motion is to ask for a Minute Entry so stating.

DATED this 28 day of July, 2006.



Larry W. Jones
Attorney for Respondent/Insurer

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day July, 2006, I served the original of the foregoing LIBERTY'S CROSS MOTION FOR PARTIAL SUMMARY JUDGMENT, first-class mail, postage prepaid, on the following:

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

and a copy of the same to the following:

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