

Robert F. James  
 Mary K. Jaraczski  
 UGRIN, ALEXANDER, ZADICK & HIGGINS, P.C.  
 #2 Railroad Square, Suite B  
 P.O. Box 1746  
 Great Falls, MT 59403  
 Telephone: (406) 771-0007  
 Facsimile: (406) 452-9360

**FILED**

JAN 20 2006

OFFICE OF  
 WORKER'S COMPENSATION JUDGE  
 HELENA, MONTANA

Attorneys for American Summit Ins. Co.,  
 Fairmont Insurance Company, Fairmont Premier  
 Insurance Company, Fairmont Specialty Insurance  
 Company, Gray Insurance Company and  
 TIG Insurance Company

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

---

CASSANDRA SCHMILL,	)	
	)	
Petitioner,	)	WCC NO. 2001-0300
	)	
-vs-	)	
	)	
LIBERTY NORTHWEST INSURANCE	)	
CORPORATION,	)	<b>UNOPPOSED MOTION FOR</b>
	)	<b>EXTENSION OF TIME TO</b>
Respondent/Insurer,	)	<b>RESPOND TO SUMMONS</b>
	)	
and	)	
	)	
MONTANA STATE FUND,	)	
	)	
Intervenor.	)	
	)	

---

Respondent/Insurers American Summit Ins. Co., Fairmont Insurance Company, Fairmont Premier Insurance Company, Fairmont Specialty Insurance Company, Gray Insurance Company and TIG Insurance Company hereby move the Court for an

Unopposed Motion for Extension of Time to Respond to Summons

additional ten days' time, until February 6, 2006, to respond to the Summons. The additional time is needed to determine if a motion to dismiss is the appropriate response to the Summons.

Petitioner's counsel, Laurie Wallace, has no objection to this request. A proposed order is enclosed for the Court's convenience.

DATED this 20<sup>th</sup> day of January, 2006.

UGRIN, ALEXANDER, ZADICK & HIGGINS, P.C.

By: MK Jaraczewski

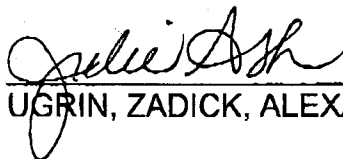
Mary K. Jaraczewski  
#2 Railroad Square, Suite B  
P.O. Box 1746  
Great Falls, Montana 59403  
Attorneys for American Summit Ins. Co.,  
Fairmont Insurance Company, Fairmont  
Premier Insurance Company, Fairmont  
Specialty Insurance Company, Gray Insurance  
Company and TIG Insurance Company

**CERTIFICATE OF MAILING**

I hereby certify that the foregoing was duly served upon the respective attorneys for each of the parties entitled to service by depositing a copy in the United States mails at Great Falls, Montana, enclosed in a sealed envelope with first class postage prepaid thereon and addressed as follows:

Laurie Wallace  
Bothe & Lauridsen, P.C.  
P.O. Box 2020  
Columbia Falls, Montana 59912

DATED this 20 day of January, 2006.



UGRIN, ZADICK, ALEXANDER & HIGGINS, P.C.

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

CASSANDRA SCHMILL,

Petitioner,

-vs-

LIBERTY NORTHWEST INSURANCE  
CORPORATION,

Respondent/Insurer,

and

MONTANA STATE FUND,

Intervenor.

WCC NO. 2001-0300

**ORDER GRANTING  
EXTENSION OF TIME TO  
RESPOND TO SUMMONS**

Pursuant to the request of Respondent/Insurers American Summit Ins. Co., Fairmont Insurance Company, Fairmont Premier Insurance Company, Fairmont Specialty Insurance Company, Gray Insurance Company and TIG Insurance Company, and Petitioner having no objection thereto,

IT IS HEREBY ORDERED that Respondent/Insurers American Summit Ins. Co., Fairmont Insurance Company, Fairmont Premier Insurance Company, Fairmont Specialty Insurance Company, Gray Insurance Company and TIG Insurance Company shall have up to and including February 6, 2006, to respond to the Summons.

Dated this \_\_\_\_ day of January, 2006.

JUDGE

## UGRIN, ALEXANDER, ZADICK &amp; HIGGINS, P.C.

JOHN D. ALEXANDER  
NANCY P. CORY  
MARK F. HIGGINS  
ROBERT F. JAMES  
Mary K. Jaraczski  
CATHY J. LEWIS  
MARK D. MEYER  
NEIL E. UGRIN  
ROGER T. WITT  
GARY M. ZADICK

ATTORNEYS AT LAW  
# 2 RAILROAD SQUARE, SUITE B  
P.O. BOX 1746  
GREAT FALLS, MONTANA 59403-1746

TELEPHONE  
(406)771-0007

FAX  
(406)452-9360

E-MAIL  
uazh@uazh.com

January 20, 2006

**BY FACSIMILE AND  
REGULAR MAIL**

Our File: T112-13 (Schmill)

Montana Workers Compensation Court  
Jackie Bockman  
Deputy Clerk of Court  
P.O. Box 537  
1625 11<sup>th</sup> Avenue  
Helena, MT 59624

**Re: WCC No. 2001-0300  
Schmill v. Liberty Northwest Ins. Co.**

Dear Ms. Bockman:

Enclosed for filing please find the Unopposed Motion for Extension of Time to Respond to Summons for Respondent/Insurers American Summit Ins. Co., Fairmont Insurance Company, Fairmont Premier Insurance Company, Fairmont Specialty Insurance Company, Gray Insurance Company and TIG Insurance Company. Please conform the copy and return to me in the self-addressed, stamped envelope provided. A proposed order is also enclosed for the Court's convenience.

Sincerely yours,

Ugrin, Alexander, Zadick & Higgins, P.C.

By:   
Mary K. Jaraczski