

Daniel J. Whyte
KELLER, REYNOLDS, DRAKE,
JOHNSON & GILLESPIE, P.C.
50 South Last Chance Gulch
P.O. Box 598
Helena, MT 59624
406-442-0230 Tele.
406-449-2256 Fax

FILED

JAN 26 2006

OFFICE OF
WORKERS' COMPENSATION JUDGE
HELENA, MONTANA

Attorneys for Insurance Company:
Arch Insurance Company
Florists' Mutual Insurance Company
The Navigators Group, Inc.

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

CASSANDRA SCHMILL,)	WCC NO. 2001-0300
)	
Petitioner,)	
)	
v.)	UNOPPOSED MOTION FOR
)	EXTENSION OF TIME
LIBERTY NORTHWEST INSURANCE)	
CORPORATION,)	
)	
Respondent/Insurer,)	
)	
MONTANA STATE FUND,)	
)	
Intervenor.)	

COMES NOW, the above listed Respondents, and move this Court for an extension of time to respond to the Court's *Amended Summons and Notice of Attorney Fee Lien* issued December 7, 2005.

Counsel for the Respondents above has contacted each requesting that they investigate any Montana claims their company has and respond to the Court's Affidavit accordingly. The research required has taken more time than anticipated, past the deadline herein. Respondents respectfully request that the Court continue the deadline for Respondents to respond until February 13, 2006.

/ / /
/ / /

Counsel for the Respondents contacted Counsel for the Petitioner and she does not oppose this motion.

DATED this 26th Day of January, 2006.

KELLER, REYNOLDS, DRAKE,
JOHNSON & GILLESPIE, P.C.



Daniel J. Whyte
50 South Last Chance Gulch
P.O. Box 598
Helena, MT 59624
Attorney for Arch Insurance Company
Florists' Mutual Insurance
The Navigators Group

CERTIFICATE OF SERVICE

I, Daniel J. Whyte, hereby certify that I served a true and correct copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME**, to the following:

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

Dated this 26th Day of January, 2006.



Daniel J. Whyte

**KELLER, REYNOLDS, DRAKE
JOHNSON & GILLESPIE, P.C.**

*Guardian Building, Third Floor
50 South Last Chance Gulch*

P. O. Box 598
Helena, Montana 59624
Tele. 406/442-0230
Fax 406/449-2256
E-Mail: djwhyte@kellerlawmt.com

SPEED MEMO

June 10, 2005

RE: Arch Insurance Company
Robert Flynn and Carl Miller, v. Montana State Fund and Liberty Northwest Insurance Corporation
WCC No. 2000-0222

Enclosed for filing, please find a **UNOPPOSED MOTION FOR EXTENSION OF TIME** in the above-entitled matter.. Thank you.

Daniel J. Whyte

TO: PATRICIA KESSNER
CLERK OF COURT
P O BOX 537
HELENA MT 59624