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FILED

JAN 26 2006

OFFICE OF
WORKERS' COMPENSATION JUDGE
HELENA, MONTANA

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

WCC No. 2001-0300

CASSANDRA SCHMILL

Petitioner

vs.

LIBERTY NORTHWEST INSURANCE CORPORATION

Respondent/Insurer.

MOTION FOR EXTENSION OF TIME AND SUPPORTING BRIEF

MOTION

COMES NOW the above-named insurer pursuant to the rules of the Montana Workers' Compensation Court and moves for an extension of time to respond to the AMENDED SUMMONS AND NOTICE OF ATTORNEY FEE LIEN for the reasons set forth with particularity in the Brief that appears immediately below.

BRIEF

A grant of extension of time is within the discretion of the Court. The Court in its AMENDED SUMMONS AND NOTICE OF ATTORNEY FEE LIEN set the date of January 23, 2006 as the deadline for responding to the AMENDED NOTICE. The press of other matters as well as the need to identify those insurers this office would be representing has prevented the Liberty Northwest, Liberty Mutual and other insurers this office will be representing from responding by the deadline.

DOCKET ITEM NO. 194

The undersigned has contacted the attorney for the Petitioner as she has no objection to extending the time for Liberty Northwest, Liberty Mutual and other insurers this office will represent up to and including January 27, 2006 within which to respond to the Amended Notice.

For the reasons set forth above, Liberty requests this Motion be granted.

DATED this 27 day of January, 2006.



Larry W. Jones
Attorney for Respondent/Insurer


CERTIFICATE OF SERVICE

I hereby certify that on the ~~25~~²⁷ day January, 2006, I served the original of the foregoing MOTION FOR EXTENSION OF TIME AND SUPPORTING BRIEF and draft Order, by facsimile transmission and first-class mail, postage prepaid, on the following:

Ms. Patricia J. Kessner (406) 444-7798
Clerk of Court
Workers' Compensation Court
PO Box 537
Helena, MT 59624-0537

and a copy of the same to the following:

Laurie Wallace (406) 892-0207
Bothe & Lauridsen, P.C.
P.O Box 2020
Columbia Falls, MT 59912


Sharon S. Delaney

**LAW OFFICE OF
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Employees of the Liberty Mutual Group

January 24, 2006

Patricia J. Kessner
Clerk of Court
Workers' Compensation Court
P. O. Box 537
Helena, MT 59624-7794

RE: Cassandra Schmill – WCC No. 2001-0300

Dear Ms. Kessner:

Enclosed are original Motion for Extension of Time and Supporting Brief and a proposed Order Granting Liberty's Motion for Extension of Time. Please file the Motion and present the Order to Judge Shea for his approval and signature.

If you have any questions concerning this filing, please do not hesitate to contact me.

Very truly yours,



Larry W. Jones

LWJ/ssd

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