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Fairmont Premier Insurance Company and  
TIG Insurance Company

**FILED**

FEB 7 2006

OFFICE OF  
WORKERS' COMPENSATION JUDGE  
HELENA, MONTANA

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

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO  
RESPOND TO SUMMONS**

Respondents/Insurers Fairmont Insurance Company, Fairmont Premier Insurance Company and TIG Insurance Company hereby move the Court for an extension of time, until March 13, 2006, to respond to the Summons.

Unopposed Motion for Extension of Time to Respond to Summons

DUCKET ITEM NO. 217

Respondents/Insurers have previously been granted a ten day extension of time, until February 6, 2006, to respond to the Summons. The additional month's time, until March 13, 2006, is needed in order to determine if Respondents/Insurers have any claimants who meet the criteria as set forth in the Summons.

Respondents/Insurers have been working diligently in order to comply with the Summons. However, the person working on this project, who had extensive historical knowledge about the companies, has taken ill with a serious medical condition. In addition, it appears that a manual search of as many as five hundred files may be necessary in order to respond to the Summons.

For these reasons, Respondents/Insurers request until March 13, 2006, to respond 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 10th day of February, 2006.

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

By: Mary K. Jaraczski

Mary K. Jaraczski  
#2 Railroad Square, Suite B  
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Attorneys for Fairmont Insurance Company,  
Fairmont Premier 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 6 day of February, 2006.

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

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February 6, 2006

**BY FACSIMILE AND  
REGULAR MAIL**

Our File: TI12-13 (Schmill)

Montana Workers Compensation Court  
Jackie Bockman  
Deputy Clerk of Court  
P.O. Box 537  
Helena, MT 59624-0537

**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 Respondents/Insurers Fairmont Insurance Company, Fairmont Premier 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. Jaraczeski

cc: L. MacDonald (w/enclose)