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 Attorneys for Respondents:
 American Economy Insurance Company
 American States Insurance Company of America
 American States Preferred Insurance Company
 First National Insurance Company of America
 General Insurance Company of America
 Safeco Insurance Company of America
 Safeco Insurance Company of Illinois

FILED

SEP 19 2007

OFFICE OF
 WORKERS' COMPENSATION JUDGE
 HELENA, MONTANA

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

CASSANDRA SCHMILL,)	
)	
Petitioner,)	WCC No.: 2001-0300
)	
Vs.)	RESPONDENT SAFECO COMPANIES
)	UNOPPOSED MOTION FOR EXTENSION TO
LIBERTY NORTHWEST)	FILE REPLY BRIEF REGARDING ITS
INSURANCE CORPORATION,)	MOTION TO STAY PROCEEDINGS
)	
Respondent/Insurer,)	
)	
And)	
)	
MONTANA STATE FUND)	
)	
Intervenor.)	
_____)	

COMES NOW the above listed Respondent/Insurers, and move this court for an extension of the deadline to file their reply brief to the Motion to Stay Proceedings filed on August 30, 2007, (document No. 387) and Notice of Joinder in Motion to Stay filed on August 31, 2007 (documents No. 388 on this Court's *Schmill* website). This motion is supported by the following brief. Counsel for Petitioner has been contacted and does not oppose this motion.

BRIEF

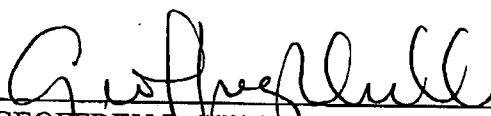
Counsel is working on its reply brief to the Motion to Stay Proceedings; however, due to the fact that counsel represents a large number of Respondents in this action who must be consulted with respect to the arguments presented in that reply, and due to the fact that it is quite time consuming to obtain their input and concerns, it is unlikely that counsel can effect such contract by Thursday, September 20, 2007, the date the reply brief is currently due.

WHEREFORE, the moving Respondents respectfully request this Court to issue an order continuing the deadline for its reply brief to the Motion to Stay Proceedings, until September 28, 2007.

DATED this 19th day of September, 2007.

MATOVICH & KELLER, P.C.

By



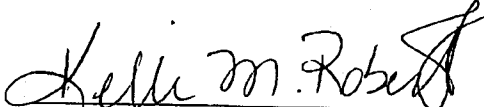
GEOFFREY R. KELLER
Attorneys for Respondent/Insurers Safeco

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was mailed postage prepaid, to the following:

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

This 19th day of September, 2007.



Kelli M. Roberts
For MATOVICH & KELLER, P.C.

**MATOVICH
& KELLER, P.C.**
Attorneys at Law

*Carey E. Matovich
Geoffrey R. Keller
Brooke B. Murphy
Benjamin O. Rechtfertig*

September 19, 2007

**Via Facsimile (406) 444-7798
and U.S. Mail**

Clara Wilson
Clerk of Court
Workers' Compensation Court
P.O. Box 537
1625 11th Avenue
Helena, Montana 59624-0537

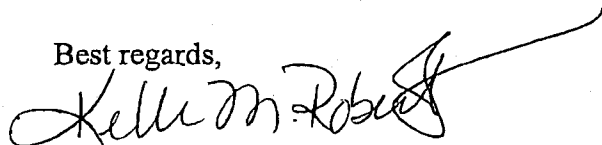
Re: Schmill v. Liberty Northwest Insurance Corporation, et al
WWC No.: 2001-0300

Dear Ms. Wilson:

Enclosed please find the original Respondent Safeco Companies Unopposed Motion for Extension to File Reply Brief Regarding Its Motion to Stay Proceedings, as well as a proposed Order granting the same..

Should you have any questions regarding the foregoing, please feel free to contact me directly.

Best regards,



Kelli M. Roberts
Legal Assistant

Enclosures