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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

**COMBINED BENEFITS
INSURANCE COMPANY'S
RESPONSE TO PLAINTIFF'S
MOTION FOR ORDER TO SHOW
CAUSE**

Counsel for Respondent Combined Benefits Insurance Company ("CBIC") advises the Court CBIC's stock was sold and transferred to Coastal Management Holdings, LLC in 2007 pursuant to a Letter of Intent. Prior to that time, CBIC was a wholly owned subsidiary of Combined Benefits Management, Inc., which in turned was wholly owned by the company know at that time as Blue Cross and Blue Shield of Montana, Inc. In 2013, that company's health insurance assets (and name) were sold to Health Care Service Corporation. The parent company that owned CBIC is now known as Caring For Montanans, Inc. ("CFM"). CFM is attempting to wind down its affairs so its assets may inure to the Montana Healthcare Foundation, a Charitable Trust.

FILED: 06/14/16

Docket Item No. 640

The undersigned sought to contact CBIC previously but due to the transitions previously identified such communications were unsuccessful. The undersigned has now been in contact with the attorneys for CFM, which has agreed to attempt to recover the data necessary to respond substantively in the form of an affidavit, in order to conclusively end any potential connection to the litigation there maybe. In doing so, CFM does not waive any meritorious defenses it may have.

ST. PAUL/TRAVELERS INSURERS

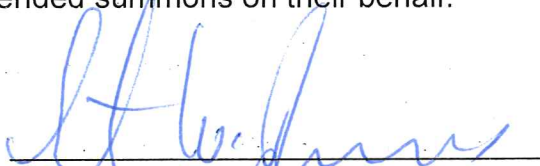
Regarding the listed insurers for St Paul/Travelers, Plaintiff is mistaken in identifying Crowley Fleck PLLP, and Steven W. Jennings, as representing these insurers. At no time has Crowley Fleck PLLP or Steven W. Jennings appeared on behalf of these insurer entities.

On January 23, 2006, Crowley Fleck PLLP through Steven W. Jennings filed a response to the *Schmill* summons (Docket 153) listing various insurers, and filed another response to the summons on February 13, 2006 (Docket 223) listing additional insurers, none of which are St. Paul or Travelers Insurance companies.

In fact, a quick search of the Montana Workers' Compensation docket for *Schmill* reveals Thomas A. Marra of the law firm of Marra, Sexe, Evenson & Bell, PC as responding to the amended summons on June 25, 2008 (Docket 436) on behalf of Economy Fire and Casualty Company, Economy Preferred Insurance Company, an Economy Premier Insurance Company with their caption identifying them as "Attorneys for Travelers Property and Casualty Insurance Company". Mr. Marra also filed an accompanying affidavit (Docket 437) wherein he identifies himself as the attorney for Travelers Property and Casualty Insurance Company. The listed entities (Economy)

were dismissed from *Schmill* on June 27, 2008 (Docket 439). The court record does not show any appearance for St. Paul/Travelers by any other person. In any case, Crowley Fleck PLLP and Steven W. Jennings have never appeared on behalf of these entities and therefore cannot respond to the amended summons on their behalf.

Dated this 14th day of June 2016.



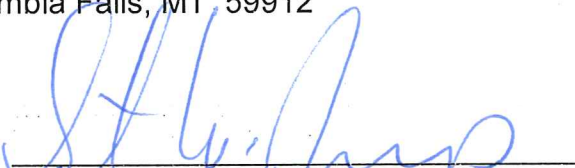
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Attorneys for Stillwater Mining Company and
General Reinsurance Corp.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served upon the following counsel of record, by the means designated below, this 14th day of June 2016:

- U.S. Mail
- FedEx
- Hand-Delivery
- Facsimile
- Email

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



STEVEN W. JENNINGS