



August 15, 2016

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**VIA HAND-DELIVERY AND E-MAIL**

Ms. Susan Richter  
Public Service Commission  
600 East Boulevard Avenue, Dept. 480  
Bismarck, ND 58505-0480

In re: PSC- Grand Forks Bean Co. (GE-15-36)

Dear Ms. Richter:

Enclosed is a correspondence from counsel for Auto-Owners Insurance Company with a check in the amount of \$100,000 for deposit of the bond proceeds in this matter. Please deposit the funds in the trust account and provide me with a copy of the deposit slip. Also, please provide me with a copy of the next bank statement reflecting that the funds have been deposited so I can provide it to counsel for Auto-Owners.

If you have any questions, please feel free to contact me.

Very truly yours,

  
MITCHELL D. ARMSTRONG

Sheldon A. Smith\*  
Randall J. Bakke\*\*\*  
Scott K. Porsborg\*\*\*  
Suzanne M. Schweigert\*  
Mitchell D. Armstrong\*\*  
Stacy M. Moldenhauer\*\*  
David J. Smith\*\*  
Shawn A. Grinolds\*\*  
Bradley N. Wiederholt\*\*  
Brian D. Schmidt\*  
Tyler J. Malm\*  
Preston J. Wise\*  
Sarah E. Kuntz\*

tmk  
enclosures  
cc: Illona Jeffcoat-Sacco (w/ enc.) (via e-mail only)

Richter.2

\* Licensed in North Dakota

\*\* Licensed in Minnesota

\*\*\* Licensed in South Dakota

\* Board Certified Civil Trial  
Specialist by National Board  
of Trial Advocacy

# MORLEY LAW FIRM, LTD.

AUG 15 2016

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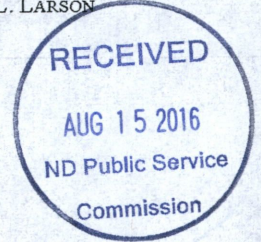
Office Manager

MERIDITH L. LARSON

August 11, 2016

Via Certified Mail – Return Requested

Mitchell D. Armstrong, Esq.  
Smith Bakke Law Office  
122 East Broadway Ave ~ P.O. Box 460  
Bismarck, ND 58502-0460



Re: *Public Service Commission v. Grand Forks Bean Company, Inc., et. al.*  
Case No.: 18-2015-cv-00240

Dear Mr. Armstrong:

Following up on an e-mail message I sent you earlier today, I enclose check number 355511530, payable by the Auto-Owners Insurance Company to the Public Service Commission as Trustee of the Grand Forks Bean Company Trust Fund involved in this proceeding, pursuant to the Order and Judgment of the Court requiring the deposit of this check into the Grand Forks Bean Trust Fund.

Also enclosed find a Receipt for this check that I would ask you to sign on behalf of the PSC and return to me as soon as you can.

Moreover, as the receipt language provides, I would ask that you send me a bank deposit receipt for this check deposit and an account statement of the Grand Forks Bean Trust Fund, on deposit with the Bank of North Dakota, which would include the amount of the enclosed Auto-Owners' check.

I am sending this check to you so that we will be in compliance with the Court's Order and Judgment for this deposit and to ensure that we are not in contempt of any Orders or Judgments of the Court. However, by sending this check to you for this deposit, we are not waiving, relinquishing or abandoning any right of Auto-Owners to pursue any available post judgment relief by motion to the District Court, or an appeal to the North Dakota Supreme Court, if necessary.

Thank you very much for your attention to this matter and please let me know if you have any questions or concerns. I look forward to the return of the signed receipt and the deposit receipt and updated Trust Fund account information as requested.

Sincerely,

Michael J. Morley  
[mmorley@morleylawfirm.com](mailto:mmorley@morleylawfirm.com)

MJM:tln

Enclosure

pc: Counsel of Record via Odyssey (w/enc.)

STATE OF NORTH DAKOTA  
COUNTY OF GRAND FORKS

IN DISTRICT COURT

NORTHEAST CENTRAL JUDICIAL DISTRICT

Public Service Commission, )  
)  
Petitioner, )  
)  
vs. )  
)  
Grand Forks Bean Company, Inc., and )  
Auto-Owners Insurance Company, )  
)  
Respondents. )

Civil No.: 18-2015-cv-00240



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**RECEIPT**

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The Public Service Commission of North Dakota, petitioner, by its authorized legal representative, hereby acknowledges the receipt from and delivery by respondent Auto-Owners Insurance Company of check number 355511530, in the sum of \$100,000.00, payable to the order of "Public Service Commission – Trustee of the Grand Forks Bean Company Trust Fund", for deposit by the petitioner into the Grand Forks Bean Company Trust Fund at issue in this action, pursuant to Paragraph 14 of the Judgment entered in this action on July 22, 2016.

The undersigned legal representative of the Public Service Commission of North Dakota shall, upon deposit of the aforementioned check of Auto-Owners Insurance Company into the Grand Forks Bean Company Trust Fund in accordance with the Order and Judgment of the Court, forthwith provide Auto-Owners' legal counsel with documentation verifying the deposit of the said check into the said Trust Fund, as well as documentation showing the current account balance of the Grand Forks Bean Company Trust Fund in this action, on deposit at the Bank of North Dakota, Bismarck, North Dakota, after the said check of Auto-Owners is deposited into the Trust Fund account.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Mitchell D. Armstrong, Esq.  
Smith Bakke Law Office  
122 East Broadway Avenue  
P.O. Box 460  
Bismarck, ND 58502-0460  
1 (701) 258-0630  
[marmstrong@smithbakke.com](mailto:marmstrong@smithbakke.com)  
Attorneys for Petitioner -  
Public Service Commission