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Gregory B. Selbo, Retired

\*Also Licensed in Minnesota  
• Also Licensed in South Dakota

December 8, 2020

**VIA E-FILING**

Petra Mandigo Hulm  
Clerk of Supreme Court  
Judicial Wing, First Floor  
600 East Boulevard Avenue  
Bismarck, ND 58505-0530

RE: Oden v. Minot Builders Supply, et al.  
Supreme Court No. 20200187  
WSI Claim No. 2010 821,085  
Our File: 19400.016

Dear Ms. Hulm:

I write in response to Appellant's Post-Oral Argument Citation submitted pursuant to Rule 28(k) of the North Dakota Rules of Appellate Procedure. I provide the Court the following "significant authorities" pertinent to the statutory provisions provided by Appellant. These cases are pertinent to the issue of jurisdiction over an "insurer."

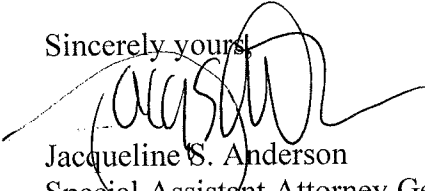
Valley Med Flight, Inc. v. Dwelle, 171 F. Supp. 3d 930 (D.N.D. 2016).

Beyer's Cement, Inc. v. North Dakota Insurance Guaranty Assoc., 417 N.W.2d 370 (N.D. 1987).

Henderson v. State, 10 N.W.2d 490 (N.D. 1943)

Watland v. North Dakota Workmen's Compensation Bureau, 59 N.D. 303 (N.D. 1929)

Sincerely yours,



Jacqueline S. Anderson  
Special Assistant Attorney General for  
Workforce Safety and Insurance

/jsa

cc: David C. Thompson (via e-filing)  
Jennifer Fender, NDWSI (via mail)

**IN THE SUPREME COURT  
STATE OF NORTH DAKOTA**

Chris Oden,  
Appellant,  
vs.  
Minot Builders Supply,  
Respondent,  
and  
North Dakota Workforce Safety and  
Insurance,  
Appellee.

Supreme Court No. 20200187  
Grand Forks Co. Civil No.: 18-2019-CV-  
02752

**AFFIDAVIT OF ELECTRONIC  
SERVICE**

STATE OF NORTH DAKOTA     )  
  )ss.  
COUNTY OF CASS             )

Melany J. Strendin, being first duly sworn on oath, deposes and says that she is of legal age, is a resident of Moorhead, Minnesota, not a party to nor interested in the action, and that she served the attached:

• **Response to Appellant's Post-Oral Argument Citations**

on the following:

**DeWayne Johnston**

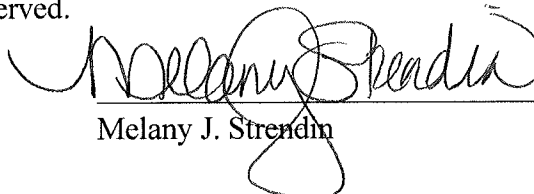
**dewayne@wedefendyou.net**

**David C. Thompson**

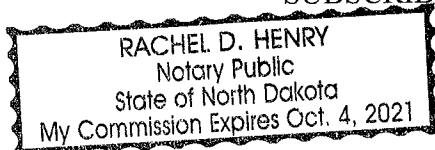
**dct@rrv.net**

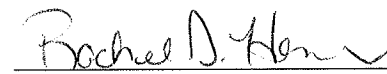
**VIA E-MAIL** to each person above named at the above e-mail address.

That the undersigned knows the person served to be the person named in the papers served and the person intended to be served.

  
\_\_\_\_\_  
Melany J. Strendin

SUBSCRIBED AND SWORN to before me on December 8, 2020.



  
\_\_\_\_\_  
Notary Public