

Jon G. Beal
Ian P. Gillespie
BEAL LAW FIRM, PLLC
121 Hickory St., Suite 4
P.O. Box 8898
Missoula, MT 59807
(406) 728-2911
jonbeal@beallawfirm.com
igillespie@beallawfirm.com

*Attorneys to Third-Party Defendant and Appellee Superior Hardwoods and
Millwork, Inc. d/b/a Grizzly Flooring Installation*

IN THE SUPREME COURT OF THE STATE OF MONTANA

Case No. DA 21-0532

DARRELL LEE CONSTRUCTION,
LLC,

Defendant, Third-Party Plaintiff,
and Appellant,

and

JON WILLIAMS; MADDUX REAL
ESTATE GROUP; INC.; DAWN
MADDUX; and RALEIGH WARD,

Defendants, Counterclaimants,
and Appellants,

**NOTICE OF SATISFACTION
OF AMENDED JUDGMENT**

and

WAGNER & LYONS ,PLLC, f/k/a
SULLIVAN, WAGNER & LYONS,
PLLC,

Appellants,

v.

SUPERIOR HARDWOODS AND
MILLWORK, INC. d/b/a GRIZZLY
FLOORING INSTALLATION,

Third-Party Defendant and Appellee.

COMES NOW Appellee Superior Hardwoods and Millwork, Inc. d/b/a Grizzly
Flooring Installation, by and through its counsel of record Jon G. Beal and Ian P.
Gillespie of Beal Law Firm, PLLC and respectfully submits this Notice of
Satisfaction of Amended Judgment in the underlying Montana Fourth Judicial District
Court, Missoula County Cause No. DV-18-109 (*James Kent Roberts, et. al v. Jon
Williams, et. al*) the Honorable John W. Larson presiding.

//

//

Notice is hereby given that the Appellants satisfied the Amended Judgment (Dkt. 399 in DV-18-109) as indicated on the attached Satisfaction of Amended Judgment (Dkt. 414 in DV-18-109) as **Exhibit 1**.

DATED this 21st day of December, 2022.

BEAL LAW FIRM, PLLC
Attorneys for Appellee Superior Hardwoods
and Millwork, Inc. d/b/a Grizzly Flooring
Installation

By: /s/ Jon G. Beal
Jon G. Beal

CERTIFICATE OF SERVICE

I, the undersigned, an employee of Beal Law Firm, PLLC, hereby certify that a true and correct copy of the foregoing was forwarded as set forth below, at Missoula, Montana this 21st day of December, 2022, to:

Jeffrey M. Roth
Jeffrey R. Kuchel
Crowley Fleck, PLLP
305 South 4th Street East, Suite 100
P.O. Box 7099
Missoula, MT 59807-7099
jroth@crowleyfleck.com
jkuchel@crowleyfleck.com

Attorneys for Defendants/Counterclaimants Maddux Real Estate, Dawn Maddux and Raleigh Ward

☒ **U.S. Mail**
☐ Hand Delivery
☐ Federal Express
☐ Facsimile
☐ Email
☒ **E-File**

Jesse Beaudette
Ryan Heuwinkel
Bohyer, Erickson, Beaudette & Tranel, PC
283 West Front Street, Suite 201
PO Box 7729
Missoula, MT 59807-7729
jbeaudette@bebtlaw.com
rheuwinkel@bebtlaw.com
jasbury@bebtlaw.com
lgibson@bebtlaw.com
mail@bebtlaw.com

Attorneys for Wagner & Lyons, PLLC f/k/a Sullivan, Wagner & Lyons, PLLC, Nathan Wagner, Zane Sullivan and Jenna Lyons

☒ **U.S. Mail**
☐ Hand Delivery
☐ Federal Express
☐ Facsimile
☒ **Email**
☒ **E-File**

Mark Williams
James Johnson
Williams, Law Firm, P.C.
235 E. Pine Street
PO Box 9940
Missoula, MT 59807-9440

mark@wmslaw.com

jjohnson@wmslaw.com

Attorneys for Datsopoulos, MacDonald, & Lind, P.C.

☒ **U.S. Mail**
☐ Hand Delivery
☐ Federal Express
☐ Facsimile
☒ **Email**
☒ **E-File**

Molly Howard
Datsopoulos, MacDonald & Lind, P.C.
Central Square Building
201 W. Main Street, Suite 201
Missoula, MT 59802

mhoward@dmlaw.com

Attorneys for Datsopoulos, MacDonald, & Lind, P.C.
Requested to Still be Copied by Mark Williams of
Williams, Law Firm, P.C.

☒ **U.S. Mail**
☐ Hand Delivery
☐ Federal Express
☐ Facsimile
☒ **Email**
☒ **E-File**

Cory R. Laird
Tyler Smith
Laird Cowley, PLLC
2315 McDonald Avenue, Ste 220
PO Box 4066
Missoula, MT 59806
claird@lairdcowley.com
tsmith@lairdcowley.com
dhanninen@lairdcowley.com

Personal Attorneys for Attorney Zane Sullivan

☒ **U.S. Mail**
☐ Hand Delivery
☐ Federal Express
☐ Facsimile
☒ **Email**
☒ **E-File**

Robert Erickson
Rhoades & Erickson, PLLC
430 Ryman Street
Missoula, MT 59802
erickson@montanalawyer.com

Attorneys for Defendant/Third-Party/Appellant Plaintiff
Darrell Lee Construction, LLC and Defendant Jon
Williams

☒ **U.S. Mail**
☐ Hand Delivery
☐ Federal Express
☐ Facsimile
☒ **Email**
☒ **E-File**

Shane MacIntyre
Brown Law Firm, P.C.
269 W. Front St., Suite A
Missoula, MT 59802

smacintyre@brownfirm.com

Attorneys for Aspen American Insurance Company

☒ **U.S. Mail**
☐ Hand Delivery
☐ Federal Express
☐ Facsimile
☒ **Email**
☒ **E-File**



Hope Moore
Paralegal to Jon G. Beal

2022-12-21 Notice of Satisfaction of Amended Judgment

Exhibit 1

BEAL LAW FIRM, PLLC

John W. Larson, District Judge
Fourth Judicial District, Dept. 3
Missoula County Courthouse
200 West Broadway
Missoula, MT 59802
(406) 258-4773

MONTANA FOURTH JUDICIAL DISTRICT COURT, MISSOULA COUNTY

JAMES KENT ROBERTS and
SUSAN ROBERTS,

Dept. 3
Cause No. DV-18-109

Plaintiffs/Counter-Defendants,
vs.

JON WILLIAMS; DARRELL LEE
CONSTRUCTION, LLC; MADDUX
REAL ESTATE GROUP, INC.;
DAWN MADDUX; and RALEIGH
WARD,

AMENDED JUDGMENT

Defendant/Counterclaimants.
DARRELL LEE CONSTRUCTION,
LLC,

Third-Party Plaintiff,
Vs.

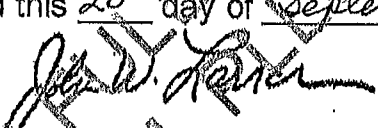
SUPERIOR HARDWOODS AND
MILLWORK, INC., d/b/a GRIZZLY
FLOORING INSTALLATION,

Third-Party Defendant.

In accordance with the Court's prior orders (Dkts. 261, 336, 378) and
Mont. Code Ann. § 35-8-1306 and Third-Party Defendant Superior
Hardwoods and Millwork, Inc. d/b/a Grizzly Flooring Installation's
("Superior") request that judgment be entered, and pursuant to Mont. R. Civ.

1 P. 58(d), judgment is hereby entered in favor of Superior. It is hereby
2 ORDERED, ADJUDGED, and DECREED that Superior recover from the
3 Defendants Jon Williams, Darrell Lee Construction, LLC, Dawn Maddux, and
4 Maddux Real Estate Group, Inc. and their former counsel, Wagner & Lyons,
5 PLLC fka Sullivan, Wagner & Lyons, PLLC, jointly and severally, the sum of
6 \$532,662.35 plus pre-judgment interest and post-judgment interest at a rate
7 of 8.5% as provided for by law.
8

9 Dated this 28th day of September, 2022.

10
11 
12 JOHN W. LARSON, DISTRICT JUDGE
13

14 Copies of the foregoing were EMAILED to:

15 Timothy D. Geiszler, Esq. - geiszler@lawmissoula.com

16 David J. Steele, Esq. - steele@lawmissoula.com

17 Layla Turman Esq. layla@kindredlegalpllc.com

18 Representing: James Kent and Susan Roberts

19 Robert Erickson, Esq. - erickson@montanalawyer.com

20 RHOADES & ERICKSON, PLLC

Representing: Darrell Lee Construction LLC, Jon Williams

21 Jon Beal, Esq. jonbeal@beallawfirm.com

22 Kristine J. Beal, Esq. - kbeal@beallawfirm.com

BEAL LAW FIRM

23 Representing: Superior Hardwoods and Millwork Inc.
24 d/b/a Grizzly Flooring Installation

25 Jeffrey M. Roth, Esq. - jroth@crowleyfleck.com

26 Jeffrey R. Kuchel, Esq. jkuchel@crowleyfleck.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CROWLEY FLECK PLLP

Representing: Maddux Real Estate Group Inc,
Dawn Maddux and Raleigh Ward

Jesse Beaudette, Esq. mall@bebtlaw.com jbeaudette@bebtlaw.com
Ryan T. Heuwinkel, Esq. rheuwinkel@bebtlaw.com
RYAN HEUWINKEL BOHYER, ERICKSON, BEAUDETTE & TRANEL, P.C.
Representing Wagner & Lyons, PLLC f/k/a
Sullivan, Wagner & Lyons, PLLC /s/ Robert Erickson

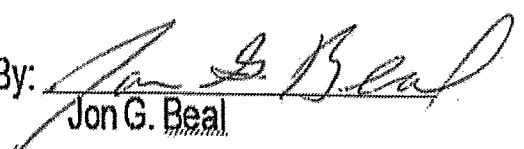
Cory R. Laird, Esq. claird@lairdcowley.com
Tyler Cole Smith, Esq. tsmith@lairdcowley.com
LAIRD COWLEY, PLLC
Personal Attorneys for Zane Sullivan

Mark S. Williams, Esq. mark@wmslaw.com
WILLIAMS LAW FIRM
Attorneys for Datsopoulos, MacDonald & Lind

Dennis Lind, Esq. dlind@dmllaw.com
Molly K. Howard, Esq. mhoward@dmllaw.com
DATSOPOULOAS, MACDONALD & LIND, P.C.
Attorneys for Datsopoulos, MacDonald & Lind
Requested to still be copied by Mark Williams

DATED this 20th day of December, 2022.

BEAL LAW FIRM, PLLC
Attorneys for Superior Hardwoods and
Millwork, Inc. d/b/a Grizzly Flooring
Installation

By: 
Jon G. Beal

CERTIFICATE OF SERVICE

I, the undersigned, an employee of Beal Law Firm, PLLC, hereby certify that a true and correct copy of the foregoing was forwarded as set forth below, at Missoula, Montana this 20th day of December, 2022, to:

Timothy D. Geiszler
David Steele II
Geiszler Steele, P.C.
Terrace West, Suite K
619 Southwest Higgins
Missoula, MT 59803

tgeiszler@gmail.com
steele@lawmissoula.com

Attorneys for Plaintiffs/Counterdefendants

[] U.S. Mail
[] Hand Delivery
[] Federal Express
[] Facsimile
[x] Email
[x] E-File

Jeffrey M. Roth
Jeffrey R. Kuchel
Crowley Fleck, PLLP
305 South 4th Street East, Suite 100
P.O. Box 7099
Missoula, MT 59807-7099

jroth@crowleyfleck.com
jkuchel@crowleyfleck.com
rdumont@crowleyfleck.com

*Attorneys for Defendants/Counterclaimants Maddux
Real Estate Group, Inc., Dawn Maddux and
Raleigh Ward*

[x] U.S. Mail
[] Hand Delivery
[] Federal Express
[] Facsimile
[x] Email
[x] E-File

Jesse Beaudette
Ryan Heuwinkel
Bohyer, Erickson, Beaudette & Tranel, PC
283 West Front Street, Suite 201
PO Box 7729

Missoula, MT 59807-7729
jbeaudette@bebtlaw.com
rheuwinkel@bebtlaw.com
jasbury@bebtlaw.com
lgibson@bebtlaw.com
mail@bebtlaw.com

*Attorneys for Wagner & Lyons, PLLC f/k/a Sullivan,
Wagner & Lyons, PLLC, Nathan Wagner, Zane
Sullivan and Jenna Lyons*

[x] U.S. Mail
[] Hand Delivery
[] Federal Express
[] Facsimile
[x] Email
[x] E-File

Mark Williams
James Johnson
Williams Law Firm, P.C.
235 E. Pine Street
PO Box 9940
Missoula, MT 59807-9440
mark@wmslaw.com
jjohnson@wmslaw.com

*Attorneys for Datsopoulos, MacDonald, & Lind,
P.C.*

☒ **U.S. Mail**
☐ Hand Delivery
☐ Federal Express
☐ Facsimile
☒ **Email**
☒ **E-File**

Molly Howard
Dennis Lind
Datsopoulos, MacDonald & Lind, P.C.
Central Square Building
201 W. Main Street, Suite 201
Missoula, MT 59802
mhoward@dmllaw.com
dlind@dmllaw.com

*Attorneys for Datsopoulos, MacDonald, & Lind,
P.C. Requested to Still be Copied by Mark
Williams of Williams, Law Firm, P.C.*

☒ **U.S. Mail**
☐ Hand Delivery
☐ Federal Express
☐ Facsimile
☒ **Email**
☒ **E-File**

Robert Erickson
Rhoades & Erickson, PLLC
430 Ryman Street
Missoula, MT 59802
erickson@montanalawyer.com

*Attorneys for Defendant/Third-Party Plaintiff Darrell
Lee Construction, LLC and Defendant Jon Williams.*

☒ **U.S. Mail**
☐ Hand Delivery
☐ Federal Express
☐ Facsimile
☒ **Email**
☒ **E-File**

Shane MacIntyre
Brown Law Firm, P.C.
269 W. Front St., Suite A
Missoula, MT 59802
smacintyre@brownfirm.com
*Attorneys for Aspen American Insurance
Company*

☒ **U.S. Mail**
☐ Hand Delivery
☐ Federal Express
☐ Facsimile
☒ **Email**
☒ **E-File**

Cory R. Laird
Tyler Smith
Riley Wavra
Laird Cowley, PLLC
2315 McDonald Avenue, Ste. 220
PO Box 4066

Missoula, MT 59806

claird@lairdcowley.com

tsmith@lairdcowley.com

rwavra@lairdcowley.com

dhanninen@lairdcowley.com

sdunwell@lairdcowley.com

Personal Attorneys for Attorney Zane Sullivan

☒ **U.S. Mail**
☐ Hand Delivery
☐ Federal Express
☐ Facsimile
☒ **Email**
☒ **E-File**

Jon Moyers

Moyers Law, PC

3936 Ave B, Suite D

Billings, MT 59102

jon@jmoyerslaw.com

Attorneys for Dawn Maddux

☒ **U.S. Mail**
☐ Hand Delivery
☐ Federal Express
☐ Facsimile
☒ **Email**
☒ **E-File**



Hope Moore
Paralegal to Jon G. Beal

CERTIFICATE OF SERVICE

I, Jon G Beal, hereby certify that I have served true and accurate copies of the foregoing Notice
- Satisfaction of Judgment to the following on 12-20-2022:

Layla Turman (Attorney)
PO Box 3493
Missoula MT 59806
Representing: James Kent Roberts, Susan Roberts
Service Method: eService

Timothy D. Geiszler (Attorney)
619 SW Higgins Avenue
Suite K
Missoula MT 59803-143
Representing: James Kent Roberts, Susan Roberts
Service Method: eService

David J. Steele (Attorney)
PO Box 369
Missoula MT 59806
Representing: James Kent Roberts, Susan Roberts
Service Method: eService

Kristine J. Beal (Attorney)
PO Box 8898
Missoula MT 59807
Representing: Superior Hardwoods and Millwork Inc
Service Method: eService

Robert Erickson (Attorney)
430 Ryman Street
Missoula MT 59802
Representing: Darrell Lee Construction LLC, Jon Williams
Service Method: eService

Jeffrey M. Roth (Attorney)
Crowley Fleck PLLP
305 South 4th Street, Suite 100
Missoula MT 59801
Representing: Maddux Real Estate Group Inc, Dawn Maddux, Raleigh Ward

Service Method: eService

Jeffrey R. Kuchel (Attorney)

Crowley Fleck PLLP

305 South 4th Street East

Suite 100

Missoula MT 59801

Representing: Maddux Real Estate Group Inc, Dawn Maddux, Raleigh Ward

Service Method: eService

Jesse Beaudette (Attorney)

283 W. Front St. Suite 201

PO Box 7729

Missoula MT 59807

Representing: Wagner and Lyons PLLC

Service Method: eService

Ryan T. Heuwinkel (Attorney)

283 W Front St, Suite 201

PO Box 7729

Missoula MT 59807

Representing: Wagner and Lyons PLLC

Service Method: eService

Mark S. Williams (Attorney)

235 East Pine

PO BOX 9440

Missoula MT 59807-9440

Service Method: eService

E-mail Address: mark@wmslaw.com

James David Johnson (Attorney)

PO Box 9440

Missoula MT 59807

Service Method: eService

E-mail Address: james@wmslaw.com

Dennis E. Lind (Attorney)

201 W Main, Suite 201

Missoula, MT 59802

Missoula MT 59802

Service Method: eService

E-mail Address: dlind@dmllaw.com

Molly K. Howard (Attorney)

201 W Main, Ste 201

Missoula MT 59802

Service Method: eService

E-mail Address: mhoward@dmllaw.com

Shane Alexander MacIntyre (Attorney)
269 W. Front St, Ste A
Missoula MT 59802
Service Method: eService
E-mail Address: smacintyre@brownfirm.com

Cory R. Laird (Attorney)
Laird Cowley, PLLC
P.O. Box 4066
Missoula MT 59806-4066
Service Method: eService
E-mail Address: claird@lairdcowley.com

Tyler Cole Smith (Attorney)
Laird Cowley, PLLC
P.O. Box 4066
Missoula
Missoula MT 59806-4066
Service Method: eService
E-mail Address: tsmith@lairdcowley.com

Riley M. Wavra (Attorney)
2315 McDonald Ave, Suite 220
Missoula MT 59801
Service Method: eService
E-mail Address: rwavra@lairdcowley.com

Jon Mark Moyers (Attorney)
490 N. 31st Street
Suite 101
Billings MT 59101
Service Method: eService
E-mail Address: jon@jmoyerslaw.com

Electronically Signed By: Jon G Beal
Dated: 12-20-2022

CERTIFICATE OF SERVICE

I, Jon G Beal, hereby certify that I have served true and accurate copies of the foregoing Notice
- Other to the following on 12-21-2022:

Kristine J. Beal (Attorney)
PO Box 8898
Missoula MT 59807
Representing: Superior Hardwoods and Millwork, Inc.
Service Method: eService

Ian Philip Gillespie (Attorney)
PO Box 8898
Missoula MT 59807
Representing: Superior Hardwoods and Millwork, Inc.
Service Method: eService

Jesse Beaudette (Attorney)
283 W. Front St. Suite 201
PO Box 7729
Missoula MT 59807
Representing: Wagner & Lyons, PLLC, f/k/a Sullivan, Wagner & Lyons PLLC
Service Method: eService

Ryan T. Heuwinkel (Attorney)
283 W Front St, Suite 201
PO Box 7729
Missoula MT 59807
Representing: Wagner & Lyons, PLLC, f/k/a Sullivan, Wagner & Lyons PLLC
Service Method: eService

Robert Erickson (Attorney)
430 Ryman Street
Missoula MT 59802
Representing: Darrell Lee Construction, LLC
Service Method: eService

Jeffrey M. Roth (Attorney)
Crowley Fleck PLLP
305 South 4th Street, Suite 100
Missoula MT 59801

Service Method: eService
E-mail Address: jroth@crowleyfleck.com

Jeffrey R. Kuchel (Attorney)
Crowley Fleck PLLP
305 South 4th Street East
Suite 100
Missoula MT 59801
Service Method: eService
E-mail Address: jkuchel@crowleyfleck.com

Mark S. Williams (Attorney)
235 East Pine
PO BOX 9440
Missoula MT 59807-9440
Service Method: eService
E-mail Address: mark@wmslaw.com

James David Johnson (Attorney)
PO Box 9440
Missoula MT 59807
Service Method: eService
E-mail Address: james@wmslaw.com

Molly K. Howard (Attorney)
201 W Main, Ste 201
Missoula MT 59802
Service Method: eService
E-mail Address: mhoward@dmllaw.com

Dennis E. Lind (Attorney)
201 W Main, Suite 201
Missoula, MT 59802
Missoula MT 59802
Service Method: eService
E-mail Address: dlind@dmllaw.com

Cory R. Laird (Attorney)
Laird Cowley, PLLC
P.O. Box 4066
Missoula MT 59806-4066
Service Method: eService
E-mail Address: claird@lairdcowley.com

Tyler Cole Smith (Attorney)
Laird Cowley, PLLC
P.O. Box 4066
Missoula
Missoula MT 59806-4066

Service Method: eService
E-mail Address: tsmith@lairdcowley.com

Riley M. Wavra (Attorney)
2315 McDonald Ave, Suite 220
Missoula MT 59801
Service Method: eService
E-mail Address: rwavra@lairdcowley.com

Shane Alexander MacIntyre (Attorney)
269 W. Front St, Ste A
Missoula MT 59802
Service Method: eService
E-mail Address: smacintyre@brownfirm.com

Electronically Signed By: Jon G Beal
Dated: 12-21-2022