

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

THE SOCIETY OF LLOYD’S,)
)
)
)
Plaintiff,)
)
)
v.)
)
ROBERT W. FUERST, HORD HARDIN,)
HAROLD F. ILG, WALTER A. KLEIN,)
MEADE M. McCAIN, JOHN J.)
SHILLINGTON, CYNTHIA J.)
TODOROVICH and MICHAEL B.)
TODOROVICH)
)
)
Defendants.)
)

Case No. 4:03CV1113 HEA
(Judge Autrey)

**MEMORANDUM IN SUPPORT OF PLAINTIFF’S MOTION FOR LEAVE TO FILE A
MEMORANDUM OF TWENTY PAGES IN SUPPORT OF
ITS MOTION FOR SUMMARY JUDGMENT**

Rule 7-4.01(D) of the Local Rules of Court for the Eastern District of Missouri, states that no motion, memorandum or brief, exclusive or signature pages and attachments, may exceed 15 pages in length without leave of court. Therefore, the Court may grant Lloyd’s leave to file a brief in excess of 15 pages. Plaintiff Lloyd’s has contemporaneously filed its motion for summary judgment against each of the eight defendants in this matter. In the interest of judicial economy and efficiency, Lloyd’s has filed a single motion for summary judgment, a single statement of undisputed facts and a single memorandum in support of its motion in accordance with Local Rule 7-4.01(E). However, because Lloyd’s is moving for summary judgment against all eight defendants in one motion and one brief in support, it requires an additional 5 pages in which to present its brief in support of its motion for summary judgment.

Respectfully submitted,

Dated: January 22, 2004

/s/ Blake T. Hannafan
BLAKE T. HANNAFAN
One of Plaintiff's Attorneys

Michael T. Hannafan & Assocs., Ltd.
Michael T. Hannafan
Blake T. Hannafan
Nicholas A. Pavich
One East Wacker Drive
Suite 1208
Chicago, IL 60601
312-527-0055

Noce & Buckley, L.L.C.
Martin Buckley
1139 Olive Street
Suite 800
St. Louis, MO. 63101
314-621-3434

CERTIFICATE OF SERVICE

I certify that on the 22nd day of January, 2004, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following: Ted F. Frapolli, Esq., 275 North Lindbergh, Suite F, St. Louis, MO 63141, Attorney for Certain Defendants; Alan C. Kohn, Esq., One US Bank Plaza, Suite 2410, St. Louis MO 63101, Attorney for Defendant Shillington and Harold F. Ilg, 100 L'Ambiance Circle, Unit 202, Naples, FL 34108 and 16401 Ranchester Drive, Chesterfield, MO 63005.

/s/ Blake T. Hannafan
Blake T. Hannafan