

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

THE SOCIETY OF LLOYD'S,)
Plaintiff,)
v.) Case No: 4:03CVOl113HEA
ROBERT W. FUERST, et al.,)
Defendants.)

THE SOCIETY OF LLOYD'S ANSWERS TO DEFENDANTS'
ROBERT W. FUERST, W ALTER A. KLEIN, MEADE M. McCAIN,
CYNTHIA J. TODOROVICH and MICHAEL B. TODOROVICH'S
FIRST SET OF INTERROGATORIES TO PLAINTIFF

Plaintiff, The Society of Lloyd's, in answer to certain defendants' interrogatories, states:

GENERAL OBJECTIONS

- a. Lloyd's objects to the interrogatories to the extent they seek information that is protected from disclosure by applicable privileges, including the attorney-client privilege and the work-product privilege.
- b. Lloyd's objects to the interrogatories to the extent they seek to impose any duties upon Lloyd's beyond the requirements set forth in the *Federal Rules of Civil Procedure*, the Rules for the United States District Court for the Eastern District of Missouri, and the applicable case law thereunder.
- c. Lloyd's objects to the interrogatories to the extent they seek information from persons or entities other than Lloyd's. Lloyd's responds to the interrogatories based on the information it has as of the date of this response. Lloyd's investigation information relevant to this suit continues and it reserves the right to supplement these answers.

ANSWERS TO INTERROGATORIES

- 1. Nicholas P. Demery, Solicitor, The Society of Lloyd's, One Lime Street, London, United Kingdom EC3M 7 HA
- 2. Lloyd's objects to this request as overly broad, burdensome and irrelevant, nor is it reasonably calculated to lead to the discovery of relevant or admissible evidence. Subject to all objections, see Lloyd's initial Rule 26(a) disclosures.
- 3. Lloyd's objects to this request as overly broad, burdensome and irrelevant, nor is it reasonably calculated to lead to the discovery of relevant or admissible evidence.
 - 4. See answer to Interrogatory No.3.
 - 5. See answer to Interrogatory No.3.
 - 6. See answer to Interrogatory No.3.
 - 7. See answer to Interrogatory No.3.
- 8. See answer to Interrogatory No.3. In addition, Lloyd's objects because this information is equally available to Defendants.
 - 9. See answer to Interrogatory No.3.
 - 10. See answer to Interrogatory No.3.
 - 11. See answer to Interrogatory No.3.
 - 12. See answer to Interrogatory No.3.
 - 13. See answer to Interrogatory No.3.

/s/

Blake T. Hannafan One of the Attorneys for Society of Lloyd's

Dated: November 24, 2003

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

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AFFIDAVIT OF NICHOLAS P. DEMERY

I, Nicholas p, Demery, being duly sworn state that the foregoing responses to Defendants' ROBERT W. FUERST, WALTER A. KLEIN, MEADE M. McCAIN, CYNTHIA J. TODOROVICH and MICHAEL B. TODOROVICH'S FIRST SET OF INTERROGATORIES TO PLAINTIFF are true and accurate to the best of by knowledge.

/s/

Subscribed and Sworn to before me this 24th day of November 2003

/s/

CERTIFICATE OF SERVICE

I, Lorraine M. Casiello, hereby certified that I caused true and correct copies of the above The Society of Lloyd's Answers to Defendants' Robert W. Fuerst, Walter A. Klein, Meade M. McCain, Cynthia J. Todorovich and Michael B. Todorovich's First Set of Interrogatories to Plaintiff to be served upon all parties of records as set forth below, via u.S. Mail on the 24th day of November, 2003, by depositing same in the U.S. Mail chute located at One East Wacker Drive, Chicago, Illinois, with proper postage pre-paid:

Ted F. Frapolli 275 North Lindbergh, Suite F St. Louis, MO 63141

Alan C. Kohn One US Bank Plaza Suite 2410 St. Louis, Missouri 63101

Harold F. Ilg 16401 Ranchester Drive Chesterfield, MO 63005

Harold Ilg 100 L'Amblance Circle Unit 202 Naples, FL 34108

/s/

Lorraine M. Casiello

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