

DEFENDANTS' EXHIBIT C

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

<b>THE SOCIETY OF LLOYD'S,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
v.	)	<b>Case No: 4:03CVO1113HEA</b>
	)	
<b>ROBERT W. FUERST, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**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.

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/s/

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

Dated: November 24, 2003

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