

DEFENDANTS' EXHIBIT D

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

THE SOCIETY OF LLOYD'S,)	
)	
Plaintiff,)	
)	
v.)	Case No: 4:03CVO113HEA
)	
ROBERT W. FUERST, et al.,)	
)	
Defendants.)	

**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 REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF**

Plaintiff, The Society of Lloyd's, in response to certain defendants' First Request for Production of Documents, states:

GENERAL OBJECTIONS

a. Lloyd's objects to the document production requests 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 document production requests 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 responds to these document production request based on the information and documents it has discovered as of the date of the response. It reserves its right to supplement its response and production with any documents discovered subsequently.

RESPONSES

1. Lloyd's objects to this request as overly broad, burdensome and as seeking irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence.

2. Lloyd's objects to this request as overly broad, burdensome and as seeking irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence.

3. Lloyd's objects to this request as overly broad, burdensome and as seeking irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence. In addition, Lloyd's objects to the extent this request seeks information protected by the attorney-client privilege and work product doctrine.

4. Lloyd's objects to this request as overly broad, burdensome and as seeking irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence.

5. Lloyd's objects to this request as overly broad, burdensome and as seeking irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence.

6. Lloyd's objects to this request as overly broad, burdensome and as seeking irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence.

7. Lloyd's objects to this request as overly broad, burdensome and as seeking irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence.

8. Lloyd's objects to this request as overly broad, burdensome and as seeking

irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence.

9. Lloyd's objects to this request as overly broad, burdensome and as seeking irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence. Lloyd's also objects to the extent that such documents should be equally available to Defendants.

10. Lloyd's objects to this request as overly broad, burdensome and as seeking irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence. Lloyd's also objects to the extent that such documents should be equally available to Defendants.

11. Lloyd's objects to this request as overly broad, burdensome and as seeking irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence.

12. Lloyd's objects to this request as overly broad, burdensome and as seeking irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence. Lloyd's also objects to the extent that such documents should be equally available to Defendants.

13. Lloyd's objects to this request as overly broad, burdensome and as seeking irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence.

14. Lloyd's objects to this request as overly broad, burdensome and as seeking irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence.

15. Lloyd's objects to this request as premature and states that no such expert exists at

this time.

17. Lloyd's objects to this request as overly broad, burdensome and as seeking irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence.

18. Lloyd's objects to this request as overly broad, burdensome and as seeking irrelevant information and it is not reasonably calculated to lead to the discovery of relevant or admissible evidence.

/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
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(312) 527-0055

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

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

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 REQUEST FOR PRODUCTION OF DOCUMENTS 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 Request for Production of Documents 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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