

EXHIBIT B

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

The Society of Lloyd's,)
)
 Plaintiff,)
) Case No: 4:03CV1113 HEA
 vs.)
)
 Robert W. Fuerst, Hord Hardin II, Harold F.)
 Ilg, Walter A. Klein, Meade M. McCain,)
 John J. Shillington, Cynthia J. Todorovich)
 and Michael B. Todorovich,)
)
 Defendants.)

AFFIDAVIT OF HORD HARDIN II

The undersigned, Hord Hardin II, on oath deposes and states as follows:

1. I am of the age of majority, under no disability, and if called as a witness would be able competently to testify to the facts asserted herein, all of which are within my personal knowledge.
2. I am one of the defendants in the action captioned above.
3. I was born in January, in St. Louis, Missouri, and am 66 years of age. I have been a resident of Michigan since 2002.
4. I have been retired from Southwest Bank since February 28, 2003.
5. I was recruited into Lloyd's by Charles Parnell of the R.W. Sturge Agency. My first meeting with him was in New York City. All of the other recruitment took place in Missouri.
6. I did not seek the advice of a lawyer or an accountant before joining Lloyd's. I relied on the statements made to me by Mr. Parnell and by "pleased" investors (Names) who lived in the St. Louis area.

7. At no time did Mr. Parnell or anyone else at Lloyd's ever mention asbestos or pollution to me. I was also told that "stop loss" insurance was not necessary, as well as a bad investment.

8. I began underwriting in 1986.

9. Neither Mr. Parnell nor anyone at The Sturge Agency nor at Lloyd's told me that there was a Lloyd's Act of 1982 which gave Lloyd's certain immunities under English law.

10. Neither Mr. Parnell nor anyone at The Sturge Agency or at Lloyd's ever explained to me how syndicates are closed by reinsurance or what an "open year" was.

11. When I went to London for my Rota meeting, I was given stacks of papers to sign. I was not able to read them all. The Committee Members told me it was not necessary to scrutinize the papers, stating that many Names before me had signed these papers placing their trust in management. There was a lot of commotion with secretaries coming in with more papers to sign and taking away the papers I already signed. They mentioned that all the other Names had signed the exact pile of documents and that other new Names were outside awaiting for their turn to sign up.

12. My original letter of credit at Lloyd's was for £70,000. After a few years my agent insisted that I increase it to £80,000. The exchanged rate on £'s fluctuated widely during the period in which the letter of credit was outstanding.

13. I have already paid Lloyd's more than \$175,000 including draw-downs on my letters of credit and payments of cash calls. When I was being recruited, I was told that a bad year could be a loss in the \$4,000 to \$6,000 range, and in a disaster year, I might lose \$10,000 to \$12,000.

14. I did not accept R & R because it didn't offer me finality. I do not want to pay

any more money to a group that has defrauded me.

I declare under penalty of perjury under the laws of the State of Missouri, United States of America, that the foregoing is true and correct.

Signed this 12th day of April, 2004, at St. Louis, Missouri.

/s/ Hord Hardin II
Hord Hardin II

STATE OF MISSOURI)
) SS
COUNTY OF ST. LOUIS)

On this 12th day of April, 2004, before me personally appeared Hord Hardin II, to me known to be the person described in and who executed the foregoing instrument, and acknowledged that he executed the same as his free act and deed and that the facts contained therein are true and correct to his best knowledge and belief.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal on the day and year first above written.

/s/ Mary Beth Arredondo
Notary Public

My Commission Expires: 1/13/2007

VERIFICATION OF SIGNED ORIGINAL DOCUMENT

Pursuant to Local Rule 11-2.11, Ted F. Frapolli, Attorney for Defendants Robert W. Fuerst, Hord Hardin II, Walter A. Klein, Meade M. McCain, Cynthia J. Todorovich and Michael B. Todorovich hereby attests to the existence of a paper copy of the Affidavit of Hord Hardin II bearing the original signature of Hord Hardin II. The document was filed electronically on April 15, 2004 as an attachment to Response, Evidentiary Objections and Counterstatements of Defendants Robert W. Fuerst, Hord Hardin II, Walter A. Klein, Meade M. McCain, Cynthia J. Todorovich and Michael B. Todorovich to Plaintiff's Statement of Undisputed Material Facts. Counsel will retain the paper copy bearing the original signature during the pendency of the litigation including all possible appeals.

LAW OFFICES OF TED F. FRAPOLLI

By: /s/ Ted F. Frapolli
Ted F. Frapolli #10480
275 North Lindbergh, Suite F
St. Louis, MO 63141
(314) 993-4261 telephone
(314) 993-3367 fax

Attorney for Defendants Robert W. Fuerst,
Walter A. Klein, Meade M. McCain,
Cynthia J. Todorovich, Michael B. Todorovich and
Hord Hardin II

CERTIFICATE OF SERVICE

I certify that on the 15th day of April, 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: Martin J. Buckley, Attorney for Plaintiff, 1139 Olive Street, Suite 800, St. Louis, Missouri 63101; Alan C. Kohn, Esq., Attorney for Defendant Shillington, One US Bank Plaza, Suite 2410, St. Louis, Missouri 63101; Blake T. Hannafan, Esq., Michael T. Hannafan & Associates, Ltd., One East Wacker Drive, Suite 1208, Chicago, IL 60601; and Harold F. Ilg, 100 L'Amiance Circle, Unit 202, Naples, Florida 34108.

 /s/ Ted F. Frapolli