

EXHIBIT C

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 WALTER A. KLEIN

The undersigned, Walter A. Klein, 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 on December 4, 1940, in Missouri, and am 63 years of age. I have been a resident of Missouri since 1940.
4. I have been semi-retired since 2001.
5. I was recruited into Lloyd's by Lord Brownlow of the Harris & Dixon Underwriting Agency. He recruited me by telephone in 1997. All of the 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 Lord Brownlow.
7. At no time did Lord Brownlow or anyone else at Lloyd's ever mention asbestos to me.

8. I began underwriting in 1978.
9. Later, neither Lord Brownlow nor anyone at Harris & Dixon Underwriting 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 Lord Brownlow nor anyone at Harris & Dixon Underwriting Agency nor 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 it all. Lord Brownlow told me not to read the papers, saying if you read it, we'll be here all day; this is where you have to trust me. I mentioned several times that I didn't understand what I was signing. Secretaries were coming in with more papers to sign and taking away the papers I already signed.
12. My original letter of credit at Lloyd's was for £59,500. After a few years, my letter of credit was increased several times after my agent insisted that I increase it to £72,900.
13. I have already paid Lloyd's more than \$509,512 including draw-downs on my letters of credit and payments of cash calls.
14. I did not accept R & R because it didn't offer me finality. Further, in 5 months, my indicative statement went from about £36,000 to £198,000 without any explanation. I felt this sum was astounding and absurd. I was never aware that I could choose between the two.

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/ Walter A. Klein
Walter A. Klein

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

On this 12th day of April, 2004, before me personally appeared Walter A. Klein, 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

