

EXHIBIT E

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 CYNTHIA TODOROVICH

The undersigned, Cynthia Todorovich, 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 April 5, 1946 in Missouri, and am 58 years of age. I have been a resident of Missouri since birth.
4. I have been working for Prints Charming Gallery since 1994.
5. I was recruited into Lloyd's by G.G. Roots of Alexander Howden & Beck, LTD. He came to Missouri to recruit me in 1986. 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 Mr. Roots.
7. At no time did Mr. Roots or anyone else at Lloyd's ever mention asbestos to me.
8. I began underwriting with Lloyd's on January 1, 1987.

9. Neither G.G. Roots nor anyone at Alexander Howden & Beck, LTD., or 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 G.G. Roots or anyone at Alexander Howden & Beck, LTD., or at Lloyd's ever explained to me how syndicates or 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 the documents due to the limited time given to me by Lloyd's representatives.

12. I have already paid Lloyd's more than \$200,000.00 including draw-downs on my letters of credit and payments of cash calls.

13. I did not accept R & R because it didn't offer me finality.

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/ Cynthia Todorovich
Cynthia Todorovich

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

On this 12th day of April, 2004, before me personally appeared Cynthia Todorovich, to me known to be the person described in and who executed the foregoing instrument, and acknowledged that she executed the same as her free act and deed and that the facts contained therein are true and correct to her 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.

My Commission Expires: 1/13/2007 /s/ Mary Beth Arredondo
Notary Public

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 Cynthia Todorovich bearing the original signature of Cynthia Todorovich. 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
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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'Ambiance Circle, Unit 202, Naples, Florida 34108.

 /s/ Ted F. Frapolli