

3. In support of this motion, Plaintiff's Memorandum in Support of Its Motion for Protective Order to Stay Certain Defendants from Proceeding in State Court to Seek Non-enforceability of This Court's Judgment Against Them is attached with Exhibits 1 – 5.

WHEREFORE, Plaintiff The Society of Lloyd's prays that the Court enter a protective order against defendants staying their further proceedings in the Circuit Court of St. Louis County or, in the alternative, requiring them to withdraw those proceedings until further order of this Court.

Respectfully submitted,

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

Dated: January 24, 2005

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CERTIFICATE OF SERVICE

I certify that on the 24th day of January, 2005, 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: Norman W. Pressman, Esq. ,121 Hunter Avenue, Suite 101, St. Louis, Missouri 63124-2082; Theodore J. Williams, Jr., Esq., Williams Venker & Sanders LLC, 10 South Broadway, Suite 1600, St. Louis, MO 63102; Harold Ilg (and Mail), 100 L'Ambiance Circle, Unit 202, Naples, FL 34108; Harold Ilg (and Mail), 16401 Ranchester Drive, Chesterfield, MO 63005; Martin J. Buckley, Esq., Buckley & Buckley, 1139 Olive Street, Suite 800, St. Louis, MO 63101-1928; and J. Talbot Sant, Jr., Armstrong Teasdale LLP, One Metropolitan Square, Suite 2600, St. Louis, MO 63102-2740 (by Mail).

/s/ Blake T. Hannafan