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

THE SOCIETY OF LLOYD'S,)	
Plaintiff,)	
v.)	Case No. 4:03CV1113 HEA
ROBERT W. FUERST, HORD HARDIN,)	
HAROLD F. ILG, WALTER A. KLEIN,)	
MEADE M. McCAIN, JOHN J.)	
SHILLINGTON, CYNTHIA J.)	
TODOROVICH and MICHAEL B.)	
TODOROVICH,)	
Defendants.)	

PLAINTIFF'S MOTION FOR PROTECTIVE ORDER TO STAY CERTAIN DEFENDANTS FROM PROCEEDING IN STATE COURT TO SEEK NON-ENFORCEABILITY OF THIS COURT'S JUDGMENT AGAINST THEM

Plaintiff The Society of Lloyd's, by its attorneys, moves that this Court enter a protective order staying five of the eight defendants from proceeding in Missouri state court to seek invalidation of this Court's July 12, 2004, Judgment against them for the following reasons:

- 1. Five of the eight defendants -- Cynthia Todorovich, Fuerst, Klein, Shillington and McCain recently filed joint motions before the Circuit Court of St. Louis County seeking to invalidate the enforceability of this Court's money Judgment against them dated July 12, 2004. (*The Society of Lloyd's v. Fuerst*, Case No. 04cc-005430 filed by defendants.)
- 2. Defendants' actions constitute a fraud on the courts. Therefore, Rule 11 sanctions should be entered against them and they should be stayed from further proceedings in the state court seeking to invalidate this Court's prior Judgment.

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

Dated: January 24, 2005

Blake T. Hannafan Michael T. Hannafan & Associates, Ltd. One East Wacker Drive Suite 1208 Chicago, IL 60601 (312) 527-0055

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
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