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

THE SOCIETY OF LLOYD'S,	)
	)
Plaintiff, v.	)
	)
	)
	)
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.	)

Case No. 4:03CV1113 HEA

(Honorable Henry E. Autrey)

## MEMORANDUM SUPPORTING PLAINTIFF'S REQUEST FOR ORAL ARGUMENT ON PENDING MOTIONS

Contemporaneous with its filing of its Reply Memorandum in Support of Its Motion to Convert Its Judgments Against Defendants From Pounds to Dollars Plaintiff requests oral argument regarding its two pending motions, Motion to Convert Its Judgments Against Defendants From Pounds Dollars and Motion to Stay Certain Defendants From Proceeding in State Court to Seek Non-Enforceability of This Court's Judgment Against Them. These two motions are related and also are related to several Defendants' actions and Motions filed in St. Louis Circuit Court. The motions are supported by several long legal memoranda. The arguments made in the various memoranda are often repetitive. Allowing oral argument on these motions will allow the parties to assist the Court in reaching the heart of the issues before it to allow for a quick resolution of these matters. Therefore, plaintiff respectfully requests that the Court grant oral argument in this matter.

Respectfully submitted,

/s/ Blake T. Hannafan

BLAKE T. HANNAFAN One of the Attorneys for Plaintiff, The Society of Lloyd's

Dated: February 22, 2005

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## **CERTIFICATE OF SERVICE**

I certify that on the 22<sup>nd</sup> day of February, 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