

**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**

**PLAINTIFF’S MOTION TO COMPEL DEFENDANT FUERST’S PRODUCTION OF  
DOCUMENTS AND APPEARANCE FOR A DEPOSITION IN ST. LOUIS**

Plaintiff The Society of Lloyd’s (“Lloyd’s”), through its attorneys, moves this Court pursuant to Federal Rule Civil Procedure 37(a) to compel Defendant Fuerst to produce documents and appear for his noticed deposition in St. Louis. Lloyd’s counsel has conferred numerous times with Fuerst’s counsel regarding the production of documents and scheduling his deposition. Unfortunately, Fuerst and his counsel are willing to abide by previous agreements and this motion is necessary. As discussed in Lloyd’s memorandum in support of this motion, it prays that the Court enter an order requiring Defendant Fuerst to immediately produce documents, appear for his deposition in St. Louis within 14 days, and order Fuerst and his counsel to pay Lloyd’s expenses, including attorneys’ fees, in bringing this motion.

Respectfully submitted,

Dated: June 3, 2005

THE SOCIETY OF LLOYD’S

By: /s/ Blake T. Hannafan  
One of Plaintiff's attorneys

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**CERTIFICATE OF SERVICE**

I certify that on the 3<sup>rd</sup> day of June, 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; J. Talbot Sant, Jr., Armstrong Teasdale LLP, One Metropolitan Square, Suite 2600, St. Louis, MO 63102-2740; Harold Ilg 100 L'Ambiance Circle, Unit 202, Naples, FL 34108 and 16401 Ranchester Drive, Chesterfield, MO 63005.

/s/ Blake T. Hannafan