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May 25, 2005

Blake T. Hannafan, Esq.
Michael T. Hannafan & Associates, Ltd.
One East Wacker Drive, Suite 1208
Chicago, Illinois 60601

Re: The Society of Lloyd's v. Robert W. Fuerst, et al.; United States District
Court, Eastern District of Missouri, Eastern Division; Case No.: 4:03-CV-
01113-HEA

Dear Mr. Hannafan:

We received your correspondence of May 24, 2005, along with the notice scheduling Mr. Fuerst's deposition for June 21, 2005 at 10:00 a.m. As of now, there is no problem with the proposed date; however, we are on a floating docket with the district court for a two-week jury trial commencing during the June 6th trial term. If there is going to be a scheduling problem, we will let you know.

Also, the deposition needs to take place in Florida since Mr. Fuerst has been residing here since late last year. We will voluntarily produce him for deposition at our offices even though your judgment has not been domesticated in Florida. If you need a name of a good court reporter down here, let us know.

Finally, it is our understanding that the documents responsive to your August 31, 2004 request for production of documents are being gathered. We'll get them to you upon receipt.

Very truly yours,



Richard R. Thames

RRT/ab
c: Robert W. Fuerst
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