

**Blake Hannafan**

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**From:** "Norman W. Pressman" <nwp@goldsteinpressman.com>  
**To:** "Norman Pressman" <nwp@goldsteinpressman.com>; "Blake Hannafan" <bth@hannafanlaw.com>  
**Cc:** "Martin Buckley" <mbuckley@noce-buckley.com>  
**Sent:** Monday, March 07, 2005 2:11 PM  
**Subject:** RE: Lloyds

Thanks for your call. I have written all five clients and expect to hear back from them this week. I say we should tentatively plan to do the depositions at your convenience during the week of April 11, 2005.

Some clients may wish to assert their fifth amendment privileges and others may not. I will try to let you know what our decisions will be prior to the depositions so we can tee up a motion with the Court.

More later this week.

**Blake Hannafan**

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**From:** "Norman W. Pressman" <nwp@goldsteinpressman.com>  
**To:** ""Blake Hannafan"" <bth@hannafanlaw.com>; "Norman Pressman" <nwp@goldsteinpressman.com>  
**Cc:** ""Martin Buckley"" <mbuckley@noce-buckley.com>  
**Sent:** Monday, March 14, 2005 4:05 PM  
**Subject:** RE: Lloyds

I'm working on all of my defending to make a decision. I think I will be in a position to tell you where we stand on Wednesday. At least some and perhaps all may agree to discovery-but it not decided.

Mr. Fuerst cannot make it until the end of April because of a medical condition. I believe that Ms. Todorvich and Mr. Todorvich will almost certainly be available the week of April 11.

Again nothing certain yet but we should be firming things up.

I think we will need a hearing on the exact amount of the judgments

## **Blake Hannafan**

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**From:** "Norman W. Pressman" <nwp@goldsteinpressman.com>  
**To:** <bth@hannafanlaw.com>; "Norman Pressman" <nwp@goldsteinpressman.com>  
**Sent:** Monday, March 21, 2005 3:05 PM  
**Subject:** RE: Lloyds

More specifically I think we will go with Cindy Todorovich on 4/12 and Mike on 4/13-I still have to confirm times and dates but these look good Fuerst can't come for medical reason until the end of April and that's when I would want to do the rest. My present inclination is to let everyone testify. If I change my position I will advise you in advance-The new bankruptcy bill has changed things

-----Original Message-----

**From:** blake hannafan [mailto:bhannafan@yahoo.com]  
**Sent:** Monday, March 21, 2005 12:52 PM  
**To:** Norman Pressman  
**Subject:** Re: Lloyds

Norm,

I'm in Switzerland and have limited access to e-mail. I plan to come to St. Louis during the week of April 11, as we had discussed. I assume these dates are still available. Please let me know.

Blake

*Norman Pressman* <nwp@goldsteinpressman.com> wrote:

Call me when you return from vacation so we can work on the depositions dates

Goldstein & Pressman, P.C.  
121 Hunter Rd.  
St. Louis, Mo 63124  
314 727 1717  
314 727 1447 (fax)

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**To:** ""Blake Hannafan"" <bth@hannafanlaw.com>; "Norman Pressman" <nwp@goldsteinpressman.com>  
**Cc:** ""Martin Buckley"" <mbuckley@noce-buckley.com>  
**Sent:** Tuesday, March 22, 2005 12:05 PM  
**Subject:** RE: Lloyds

To those of you not in Switzerland-We have two motions on the docket for tomorrow. I'm happy to go out there and argue them-Frankly I think that procedurally the motion to amend is premature because it was filed within the eleven day period under the federal rules and you guys are also challenging it. If and when it becomes final I think the only question will be whether it relates back to the the initial filing-. Assuming Judge Autrey's ruling is not reserved on appeal my initial motion in the state court would be denied as moot. I suggest we continue the motions for at least a month. On the other hand if you want to proceed I'll see you.

I'd like to firm up some dates at the end of April for the Shillington Klein and Fuerst depositions (assuming they will not take the fifth).

On Ms. Todorvich I'd like to do her either on the afternoon of the 13th or the fourteen. Mike Todorvich can be here either on the 12 or the afternoon of the 13th. Without waiving our rights it appears that Mrs. Todorvich will complete bankruptcy schedules and present them to you with some supporting documents and make you an offer commensurate with what you would get in a Chapter 7. Mr. T. may or may not do the same but will probably testify.

I make these statements to you for your planning purposes.

**Blake Hannafan**

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**From:** "Norman W. Pressman" <nwp@goldsteinpressman.com>  
**To:** <bth@hannafanlaw.com>  
**Sent:** Thursday, March 31, 2005 2:37 PM  
**Subject:** RE: Lloyds

Blake: I am leaving town at 2:20 for Poker Fantasy Camp in Vegas. How about Mike on 4/13 in the pm and Cindy the following day.

Mike has hired Bankruptcy Counsel in Florida and just gave me her name. He will be in town on April 9 and give me the documents. I think the chances of resolving this one is very small in that the size of the judgment is so large and the amount of his assets is small.

I am hoping to have Cindy's bankruptcy Schedules in draft and a long letter to you on Tuesday with a proposed settlement. I assume you will still want to depose her and will do so on April 14 if that fits with your schedule. I am convinced that our offer to you will exceed what you would get in a bankruptcy.

I'd like to agree on April 26 and 27 for Fuerst's and Klein's depositions.

I will try to make you an offer on Fuerst and Shillington with a detailed description of why it makes sense before those.

My current intention is not to invoke the fifth amendment on any client subject to confirmation with the clients. If that changes I will let you know in advance.

Mr. Kohn as you know is now working with Mr. Shillington.

-----Original Message-----

**From:** blake hannafan [mailto:bhannafan@yahoo.com]  
**Sent:** Monday, March 21, 2005 3:55 PM  
**To:** Norman Pressman  
**Subject:** RE: Lloyds

Norm,

The 12th and 13th will probably still work. However, the 14th would help. I will talk with Tal Sant about Hardin on the 13th when I get back. Let's plan, for now, that I will depose Cynthia and Michael on the 12th and 14th if that works for you. I will depose your others (except Fuerst) if they are available.

Thanks,  
 Blake

*"Norman W. Pressman" <nwp@goldsteinpressman.com> wrote:*

I'm sorry I thought you were doing him on the 11th I think the 13th or 14 will be okay get me your schedule

-----Original Message-----

**From:** blake hannafan [mailto:bhannafan@yahoo.com]  
**Sent:** Monday, March 21, 2005 2:27 PM

**To:** Norman Pressman  
**Subject:** RE: Lloyds

Norm,

I got your e-mails. Thanks. I believe that I am deposing Hord Hardin on the 13th, but can probably do 2 people that day.

Blake

*"Norman W. Pressman"* <nwp@goldsteinpressman.com> wrote:

More specifically I think we will go with Cindy Todarvich on 4/12 and Mike on 4/13-I still have to confirm times. and dates but these look good Fuerst can't come fro medical reason until the end of April and that's when I would want to do the rest. My present inclination is to let everyone testify. If I change my position I will advise you in advance-The new bankruptcy bill has changed things

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**From:** "Norman Pressman" <nwp@goldsteinpressman.com>  
**To:** "Blake Hannafan" <bth@hannafanlaw.com>  
**Sent:** Monday, April 04, 2005 10:32 AM  
**Subject:** Cindy Todarvich-Bob Fuerst-Walter Klein

Will be in my office tommorrow with documents. I expect to fax you a letter and proposed bankruptcy schedules as promised. I'll see how b voluminous the documents are.

Bob Fuerst is planning to be here on the afternoon of April; 26th for his deposition and I'd like to confirm the time with you.

I'll coordinate the Klein and Fuerst depo time with you so you can make one trip.

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**From:** "Norman Pressman" <nwp@goldsteinpressman.com>  
**To:** <bth@hannafanlaw.com>  
**Cc:** "Rick Thames" <RRT@stutsman-thames.com>; <Rwfuerst@aol.com>  
**Sent:** Tuesday, May 03, 2005 12:46 PM  
**Subject:** Fuerst

Thanks you for your voice mail message

Fuerst has retain Florida Counsel who tells me he will produce Bob-I am being phased out.

Rick Thames  
121 West Forsyth Street, Suite 600  
Jacksonville, FL 3220121 West Forsyth Street, Suite 600 Jacksonville, FL  
32202 904-358-4000

I e-mailed Rick this morning and it appears he will be out until Monday Morning although I am copying him on this e-mail with your number (312) 527-0055

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