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June 7, 2005

VIA FACSIMILE and U.S. Mail

Norman W. Pressman
Goldstein & Pressman, P.C.
121 Hunter Ave.
Suite 101
St. Louis, MO 63124-2082

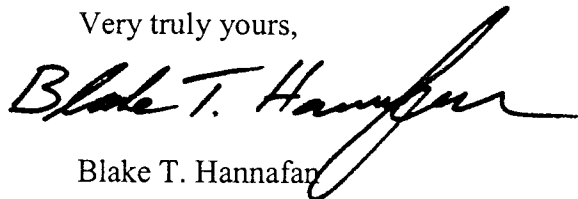
Re: The Society of Lloyd's v. Robert Fuerst

Dear Mr. Pressman:

I have reviewed your Memorandum in Response to Lloyd's Motion to Compel Mr. Fuerst to produce documents, appear in St. Louis for his deposition and for Lloyd's expenses, including attorneys' fees. While you have now agreed to produce him in St. Louis on June 21, 2005, and to "provide documents in response to the document request," you do not state that you will produce all of the documents requested by Lloyd's in August 2004 or when you will produce them. Therefore, please confirm that Mr. Fuerst will deliver, to my office, all responsive documents to Lloyd's requests at least one week before his deposition, June 14, 2005. Finally, contrary to the statement in your Response Brief, Mr. Fuerst's deposition will occur at the time and place stated in the Notice, namely 10:00 a.m. on June 21 at the offices of Buckley & Buckley.

This is also to advise you that Lloyd's, pursuant to Rule 37(a)(4)(A), will continue to seek to recover its expenses, including its attorneys' fees, against you and Mr. Fuerst for having to bring its Motion to Compel. As you know, on May 31, 2005, after you told me that there would be a "fight" about the location of Mr. Fuerst's deposition, I told you that Lloyd's would file a Motion to Compel and seek expenses and fees against you and him by the end of the week.

Very truly yours,



Blake T. Hannafan