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U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DIVISION OF MISSOURI
EASTERN DIVISION

FILED

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U. S. DISTRICT COURT
E. DISTRICT OF MO.

ASSOCIATION OF LLOYD'S)
)
 PLAINTIFF)
)
 Vs.)
)
 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. 4:03CV01113 HEA

MOTION TO DISMISS PLAINTIFF'S ATTORNEY, MICHAEL T. HANNAFAN
& ASSOCIATES, LTD, DUE TO CONFLICT OF INTEREST

COMES NOW defendant Harold F. Ilg to ask the court to remove Plaintiff's Attorney, Michael T. Hannafan & Associates, LTD. ("Hannafan") due to a conflict of interest.

I was a member of the St. Louis Association of Lloyd's Names, and Hannafan' co-counsel Peper, Martin, Jensen, Maichel and Hetlage, successor firm to Blackwell, Sanders, Peper & Martin ("Peper Martin") provided this Association with legal advice in regards to matters related to the Plaintiff.

Peper Martin acknowledged that I contracted with Peper Martin for the rendition of legal services; see Exhibit 1, 2 of 3, Item 7.

Peper Martin acknowledges that they have the following documents in their possession, see Exhibit II:

1. A list of my assets.
2. My will.
3. My living trust.
4. Various documents related to asset protection, estate planning, and family limited

partnerships.

Because of this potentially damaging information, Peper Martin has agreed to step down due to this conflict of interest.

The two Peper Martin attorneys, Eric D. Martin and William A. Richter, referenced in Exhibits I & II are currently still employed by Peper Martin.

Hannafan, as co-counsel, is also aware of this information.

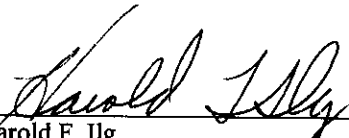
CONCLUSION

Hannafan should be required to step down as Plaintiff's Attorney due to a conflict of interest since they have been privy to items subject to privileged communications between attorneys contracted by me for the rendition of legal services.


Dated: November 14, 2003

I certify that the above is true.




Harold F. Ilg
100 L'Ambiance Circle Unit 202
Naples, FL 34108
(239)514-3648 (Home)

Sworn to and subscribed before me this 14 Day of November 2003.


Notary Public
David E. Freeland

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above was mailed
This 20 day of Nov, 2003, to: Michael A.
Clithero, Blackwell, Sanders, Peper & Martin,
720 Olive St., Suite 2400, St. Louis, Missouri 63101
(Resigned Attorney for Plaintiff Society of Lloyd's),
Michael T. Hannafan, Michael T. Hannafan & Associates, LTD.,
One East Wacker Drive, Suite 1208, Chicago, IL 60601
(Attorney for Plaintiff Society of Lloyd's),
Ted. F. Frapolli, 275 North Lindberg, Suite F, St. Louis,
Missouri 63141 (Attorney of Defendants Robert W. Fuerst,
Meade M. McCain, Cynthia J. Todorovich, Michael B.
Todorovich, and Walter Klein), Alan Kohn,
Kohn Shands Elbert Gianoulakis & Giljum, LLP,
505 N. 7th St., Suite 2410, St. Louis, Missouri 63101
(Attorney for Defendant John J. Shillington)