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May 5, 1998

Mr. Harold F. Ilg
100 L'Ambiance Circle #202
Naples, Florida 34108

RE: *William A. Richter v. Harold Ilg*

Dear Mr. Ilg:

I am writing in response to the issues raised in your letter dated April 28, 1998 in the above-referenced case.

1. Continuance

The judge in Division 27 of the Circuit Court of the City of St. Louis will call this case at 9:30 a.m. on May 14, 1998. At this time, I will present proof to the court that you have been served and will convey to the court your request to set this case for trial during the week of July 20th, 1998. If the court cannot set the trial for that week, I will request that the court continue the case for one month. I will let you know the rescheduled date. You should call the court clerk for any other information you wish regarding the status of this case.

2. Request for Documents Relating to Legal Representation

There are a number of documents relating to the firm's estate and tax planning work that you engaged us to do for you. William Richter, the firm's finance partner, discussed the outstanding balance with you on June 5, 1996 and offered to send you copies of such documents. During this conversation, you advised Mr. Richter that you did not want him to send you any information concerning our representation of you and that the firm should go ahead and file suit against you. Mr. Richter sent you a letter on March 7, 1997 reflecting that conversation and giving you a further opportunity to resolve this dispute. Now that you request the documents that you previously directed us not to send, I enclose the following documents relating to services we devoted to you:

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1. Al Rose's letter to you dated January 21, 1994 confirming your meeting for January 31 and furnishing you a pamphlet on asset protection techniques.

DATE 2. The asset protection pamphlet.

3. A list of your assets you furnished Al Rose at the meeting.

4. The first page of the copy of your then existing living trust which you furnished Al Rose at the meeting.

5. The first page of the copy of your then existing will which you furnished Al Rose at the meeting.

6. Al Rose's memorandum dated February 1, 1994 of the meeting.

7. Al Rose's letter to you dated March 18, 1994 confirming we were doing estate and tax planning for you and confirming we were working on a detailed memorandum on the impact on your estate plan of the law on fraudulent transfers.

8. Al Rose's letter to you dated April 13, 1994 transmitting the memorandum on estate planning issues and also enclosing a memorandum on family partnerships.

9. The Issues memorandum dated April 11, 1994.

10. The Family Limited Partnership memorandum dated March 15, 1994.

11. William Richter's letter to you dated March 7, 1997 confirming that you did not want to receive any information about the firm's representation of you and that the firm should go ahead and file suit.

I believe the above documentation cogently demonstrates we devoted substantial services to you and you will agree that the enclosed documents provide compelling evidence that you were indeed a client of our firm and received value for our services rendered.

3. Discovery Requests

Your letter requests certain written and deposition discovery. If you wish to conduct discovery, you will need to make formal discovery requests in compliance with the Missouri Rules of Civil Procedure.

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4. Venue

With respect to the request that we sue you in Florida, the firm closed its Florida offices in the Fall of last year. The case will proceed here in St. Louis.

Please call me if you wish to discuss resolution of this case.

Sincerely,



Eric D. Martin

Enclosures

cc: William Richter, Esq.
Al Rose, Esq.