

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI

The Society of Lloyd's, )  
)  
Plaintiff, )  
) Case No: 4:03CV1113 HEA  
vs. )  
)  
Robert W. Fuerst, Hord Hardin II, Harold F. )  
Ilg, Walter A. Klein, Meade M. McCain, )  
John J. Shillington, Cynthia J. Todorovich )  
and Michael B. Todorovich, )  
)  
Defendants. )

**JOINT MOTION TO DISMISS OF DEFENDANTS ROBERT W. FUERST,  
WALTER A. KLEIN, MEADE M. McCAIN,  
CYNTHIA J. TODOROVICH AND MICHAEL B. TODOROVICH  
PURSUANT TO FED. R. CIV. P. 12(b)(3)  
AND 28 U.S.C. § 1391 FOR IMPROPER VENUE**

COME NOW Defendants Robert W. Fuerst, Walter A. Klein, Meade M. McCain,  
Cynthia J. Todorovich and Michael B Todorovich, by their counsel, and move this Court as  
follows:

1. Plaintiff The Society of Lloyd's is a corporation organized and existing by a  
Special Act of Parliament of the United Kingdom.
2. This action was commenced on or about August 13, 2003, and was brought in the  
Eastern District of the State of Missouri.
3. Defendants Robert W. Fuerst, Walter A. Klein, Meade M. McCain, Cynthia J.  
Todorovich and Michael B. Todorovich have become aware, upon the filing of Defendant Hord  
Hardin II's Amended Answer that Defendant Hord Hardin II is not, and was not at the time of the  
filing of this Complaint, a resident of Missouri but is, and was, a resident of the State of  
Michigan.



CERTIFICATE OF SERVICE

I certify that on the 8<sup>th</sup> day of December, 2003, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following: Martin J. Buckley, Attorney for Plaintiff, 1139 Olive Street, Suite 800, St. Louis, MO 63101-1928 Michael T. Hannafan, Esq., Attorney for Plaintiff, One East Waker Drive, Suite 1208, Chicago, IL 60601; Alan C. Kohn, Esq., Attorney for Defendant Shillington, One US Bank Plaza, Suite 2410, St. Louis, Missouri 63101.

I certify that on the 8<sup>th</sup> day of December, 2003, the foregoing was mailed by United States Postal Service to the following non-participants in Electronic Case Filing: Harold F. Ilg, 100 L' Ambiance Circle, Unit 202, Naples, Florida 34108.

/s/ Ted F. Frapolli  
Ted F. Frapolli