



KAJ 8/30/02 13:42

3:02-CV-00448 SOCIETY OF LLOYDS V. BLACKWELL

\*47\*

\*M.\*

ORIGINAL

FRIED, FRANK, HARRIS, SHRIVER & JACOBSON  
350 South Grand Avenue, Suite 3200  
Los Angeles, CA 90071-3406

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Stephen D. Alexander (SBN: 141099)  
Susan C. Chun (SBN: 193364)  
FRIED, FRANK, HARRIS, SHRIVER & JACOBSON  
350 South Grand Avenue, Suite 3200  
Los Angeles, CA 90071-3406  
Telephone: 213.473.2000  
Facsimile: 213.473.2222

FILED  
OCT 30 2002  
CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY:  DEPUTY

Of Counsel:  
Debra M. Torres  
Stephanie Goldstein  
FRIED, FRANK, HARRIS, SHRIVER & JACOBSON  
One New York Plaza  
New York, NY 10004-1980  
Telephone: 212.859.8000  
Facsimile: 212.859.4000

Attorneys for Plaintiff  
THE SOCIETY OF LLOYD'S

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

THE SOCIETY OF LLOYD'S,

Plaintiff,

v.

ROBERT C. BLACKWELL, SAMME JO BRADY,  
COCO ALEXANDRA ELIZABETH CARTER,  
JOHN R. DOUGERY, JOSEPH MELVIN  
GAGLIARDI, HARRY WALTER GORST,  
FREDERICK GORDON GRAEBER, MICHAEL  
CALVIN HIRSH, IVARS RALPH JANIEKS,  
ROWLAND WILLIAM JOHNSTON, WILLIAM  
DOBSON KILDUFF, JANE ELIZABETH LAMB,  
DONALD RUDOLPH LAUB, FRANK F. S. LIN,  
ROBERT KRAMER LOWRY, GEOFFREY O.  
MAVIS, WILLIAM FENTON MILLER JR.,  
ROBERT MARSHALL MORTON, CHARLES  
WEBB OTT, RICHARD DAVID ROSENBLATT,  
RONALD GEORGE SPENO, ROBERT LYNN  
SWISHER, STEPHEN JOHN WILSEY, PETER  
FRANCIS ZINSLI, DOES 1-100 AS PERSONAL  
REPRESENTATIVES, BENEFICIARIES AND  
TRUSTEES OF THE TRUST OF ALFRED VERNE  
BALLARD'S ESTATE, DOES 1-100 AS  
PERSONAL REPRESENTATIVES,  
BENEFICIARIES AND TRUSTEES OF THE  
TRUST OF DELMAR ABSHER BRADY'S  
ESTATE,

Defendants.

Case No. 02 CV 0448 J (AJB)

**PLAINTIFF THE SOCIETY  
OF LLOYD'S NOTICE OF  
MOTION FOR SUMMARY  
JUDGMENT PURSUANT TO  
FED. R. CIV. P. 56 AGAINST  
DEFENDANT COCO  
ALEXANDRA ELIZABETH  
CARTER**

Date: October 28, 2002  
Time: 10:30 a.m.  
Courtroom: 2nd Floor, Room 12  
Judge: Napoleon A. Jones, Jr.

47

FRIED, FRANK, HARRIS, SHRIVER & JACOBSON  
350 South Grand Avenue, Suite 3200  
Los Angeles, CA 90071-3406

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on October 28, 2002 at 10:30 a.m., or as soon  
3 thereafter as the matter can be heard by the above-entitled Court, located at 880 Front Street,  
4 San Diego, California 92110, Second Floor, Room 12, Plaintiff The Society of Lloyd's  
5 ("Plaintiff") will and hereby does move the Court for summary judgment in favor of  
6 Plaintiff and against Defendant Coco Alexandra Elizabeth Carter ("Defendant").

7 Pursuant to said motion, Plaintiff seeks recognition and enforcement, under  
8 California's Uniform Foreign Money Judgment Recognition Act (the "Recognition Act"),  
9 California Code of Civil Procedure §§ 1713 *et seq.*, of a final judgment entered by the High  
10 Court of Justice, Queen's Bench Division in London, England against Defendant (the  
11 "Judgment").

12 This motion is made upon the ground that there is no genuine issue of any material  
13 fact, and that, as a matter of law, the criteria for recognition of the Judgment in the  
14 Recognition Act is satisfied and none of the statutory bases for non-recognition exist.

15 This motion is also made on the ground that the Judgment is entitled to full  
16 recognition and enforcement pursuant to traditional principles of international comity as  
17 understood and applied by the courts of the United States and the State of California.

18 ///

19 ///

20 ///

21

22

23

24

25

26

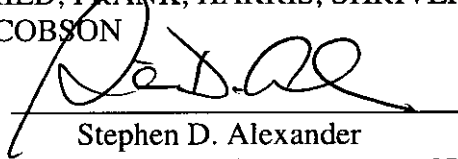
27

28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

This motion is based upon this Notice of Motion and Motion, the accompanying memorandum of Points and Authorities, the Separate Statement of Material Facts, the Declaration of Nicholas P. Demery, all pleadings and papers on file in this action, and upon such other matters as may be presented to the Court at the time of the hearing on this Motion.

DATED: August 27, 2002

Respectfully submitted,  
  
Stephen D. Alexander  
FRIED, FRANK, HARRIS, SHRIVER &  
JACOBSON  
By:   
Stephen D. Alexander  
Attorneys for Plaintiff The Society of Lloyd's

FRIED, FRANK, HARRIS, SHRIVER & JACOBSON  
350 South Grand Avenue, Suite 3200  
Los Angeles, CA 90071-3406

# 80232

FRIED, FRANK, HARRIS, SHRIVER & JACOBSON  
350 South Grand Avenue, Suite 3200  
Los Angeles, CA 90071-3406

PROOF OF SERVICE

STATE OF CALIFORNIA )  
 ) ss  
COUNTY OF LOS ANGELES )

I am employed in the county of Los Angeles, State of California. I am over the age of eighteen years, and not a party to the within action. My business address is 350 South Grand Avenue, 32<sup>nd</sup> Floor, Los Angeles, California 90071.

On August 30, 2002, I served the following documents described as: **PLAINTIFF THE SOCIETY OF LLOYD'S NOTICE OF MOTION FOR SUMMARY JUDGMENT PURSUANT TO FED. R. CIV. P. 56 AGAINST DEFENDANT COCO ALEXANDRA ELIZABETH CARTER** on the parties in this action by:

- (BY PERSONAL SERVICE) I placed such envelope to be delivered to the offices of the addressee.
- BY U.S. MAIL. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at , in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- BY FEDERAL EXPRESS OVERNIGHT DELIVERY. I am "readily familiar" with the firm's practice of collection and processing correspondence with Federal Express on the same date that it is placed for collection. On August 30, 2002, I placed such envelope to be delivered by Federal Express overnight mail to the addressee listed above.

Coco Alexandra Elizabeth Carter 6 Buckskin Drive Weston, MA 02493-1130	Via U.S. Mail
Charles Hicks Wedlake Bell 16 Bedford Street Covent Garden London WC2E 9HF	Via Federal Express (International)

I declare that I am employed in the office of a member of the bar of this court whose direction the service was made. Executed on August 30, 2002, at Los Angeles, California.

  
Patty Flores