



KAJ 11/5/02 14:25  
3:02-CV-00448 SOCIETY OF LLOYDS V. BLACKWELL  
\*114\*  
\*JOIN.\*

FILED

02 NOV -1 PM 4:01

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY: *[Signature]* DEPUTY

1 Greg J. Ryan, Esq., State Bar No. 096071  
2 LAW OFFICES OF GREG J. RYAN, APLC  
3 1010 Second Avenue, Suite 2500  
4 San Diego, CA 92101  
5 Telephone: (619) 239-4848  
6 Facsimile: (619) 239-8858

7 Theodore W. Grippo, Jr. (Admitted Pro Hac Vice)  
8 LINDENBAUM COFFMAN, KURLANDER BRISKY & GRIPPO, LTD  
9 Three First National Plaza, Suite 2315  
10 Chicago, Illinois 60602-4206  
11 Telephone: (312) 855-4410  
12 Facsimile: (312) 855-4423

13 Attorneys for Defendants, ROBERT C. BLACKWELL, SAMME JO BRADY, JOHN R. DOUGERY, JOSEPH  
14 MELVIN GAGLIARDI, HARRY WALTER GORST, FREDERICK GORDON GRAEBER, MICHAEL CALVIN HIRSH,  
15 IVARS RALPH JANIEKS, WILLIAM DOBSON KILDUFF, JANE ELIZABETH LAMB, DONALD RUDOLPH LAUB,  
16 GEOFFREY O. MAVIS, WILLIAM FENTON MILLER JR., ROBERT MARSHALL MORTON, CHARLES WEBB OTT,  
17 RONALD GEORGE SPENO, STEPHEN JOHN WILSEY, PETER FRANCIS ZINSLI,

**UNITED STATES DISTRICT COURT**

**SOUTHERN DISTRICT OF CALIFORNIA**

18 THE SOCIETY OF LLOYD'S,

19 Plaintiff,

20 v.

21 ROBERT C. BLACKWELL, SAMME JO BRADY,  
22 COCO ALEXANDRA ELIZABETH CARTER,  
23 JOHN R. DOUGERY, JOSEPH MELVIN  
24 GAGLIARDI, HARRY WALTER GORST,  
25 FREDERICK GORDON GRAEBER, MICHAEL  
26 CALVIN HIRSH, IVARS RALPH JANIEKS,  
27 ROWLAND WLLIAM JOHNSTON, WILLIAM  
28 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)

) BLACKWELL DEFENDANTS

) JOINDER IN JOHNSTON

) DEFENDANTS OPPOSITION TO

) LLOYD'S MOTION FOR

) SUMMARY JUDGMENT

) [LCR 7.1(j)]

114

*CR*

1 Pursuant to Local Rule 7.1(j), Defendants Robert C. Blackwell, Samme Jo Brady, John  
2 R. Dougery, Joseph Melvin Gagliardi, Harry Walter Gorst, Frederick Gordon Graeber, Michael  
3 Calvin Hirsh, Ivars Ralph Janieks, William Dobson Kilduff, Jane Elizabeth Lamb, Donald  
4 Rudolph Laub, Geoffrey O. Mavis, William Fenton Miller Jr., Robert Marshall Morton, Charles  
5 Webb Ott, Ronald George Speno, Stephen John Wilsey, Peter Francis Zinsli, ("Blackwell  
6 defendants") hereby file this joinder in the Johnston Defendants' opposition to Plaintiff The  
7 Society of Lloyd's ("Lloyd's) Motion for Summary Judgment, presently pending before this  
8 Court on the grounds that the English judgments violate Cal. Code Civ. Proc. § 1132, 1133, et  
9 seq. and Cal. Civ. Code § 1668.

10 Respectfully submitted,

11 LAW OFFICES OF GREG J. RYAN, APLC

12 Dated: November 1, 2002

13 By: Greg J. Ryan  
14 Greg J. Ryan, Esq.  
15 Attorneys for Blackwell Defendants  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 Greg J. Ryan, Esq., State Bar No. 096071  
LAW OFFICES OF GREG J. RYAN, APC  
2 1010 Second Avenue, Suite 2500  
San Diego, CA 92101  
3 Telephone: (619) 239-4848  
Facsimile: (619) 239-8858

4 Theodore W. Grippo, Jr. (Admitted Pro Hac Vice)  
5 LINDENBAUM COFFMAN  
KURLANDER BRISKY & GRIPPO, LTD  
6 Three First National Plaza, Suite 2315  
Chicago, Illinois 60602-4206  
7 Telephone: (312) 855-4410  
Facsimile: (312) 855-4423

8 Attorneys for ROBERT C. BLACKWELL, SAMME JO BRADY, JOHN R. DOUGERY, JOSEPH MELVIN  
9 GAGLIARDI, HARRY WALTER GORST, FREDERICK GORDON GRAEBER, MICHAEL CALVIN HIRSH, IVARS  
RALPH JANIEKS, WILLIAM DOBSON KILDUFF, JANE ELIZABETH LAMB, DONALD RUDOLPH LAUB, GEOFFREY  
10 O. MAVIS, WILLIAM FENTON MILLER JR., ROBERT MARSHALL MORTON, RONALD GEORGE SPENO, CHARLES  
WEBB OTT, STEPHEN JOHN WILSEY, PETER FRANCIS ZINSLI,

11 **UNITED STATES DISTRICT COURT**  
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13  
14 THE SOCIETY OF LLOYD'S,

15 Plaintiff,

16 v.

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

27 Defendants.  
28 \_\_\_\_\_

) Case No. 02 CV 0448 J (AJB)

) **PROOF OF SERVICE**

) JUDGE: Honorable Napoleon A. Jones  
Presiding

1 I, Sheryl D. Adams, declare:

2 That I am, and was at the time of service of the papers herein referred to, over the age of 18  
3 years, and not a party to this action; and I am employed in the County of San Diego, California,  
4 within which county the subject mailing occurred. My business address is 1010 Second Avenue,  
Suite 2500, San Diego, California 92101.

5 On **November 1, 2002**, I served the following document(s):

6 **BLACKWELL DEFENDANTS JOINDER IN JOHNSTON DEFENDANTS**  
7 **OPPOSITION TO LLOYD'S MOTION FOR SUMMARY JUDGMENT [LCR 7.1(j)]**

8 ( ) **BY MAIL:** I declare that I am readily familiar with the business practice for collection and  
9 processing of correspondence for mailing with the United States Postal Service; that the  
10 correspondence shall be deposited with the United States Postal Service this same day in the  
ordinary course of business; and that a true copy was placed in a separate envelope, with postage  
thereon fully prepaid for each addressee named hereafter:

11 Steven D. Alexander, Esq.  
12 Susan Chun, Esq.  
13 Fried, Frank, Harris, Shriver  
and Jacobson  
14 350 South Grand Avenue  
Two California Plaza, Suite 3200  
Los Angeles, CA 90071-5438  
(213) 473-2000  
15 **Attorney for Plaintiff**  
**THE SOCIETY OF LLOYD'S**

Daphne Bishop  
Pillsbury Winthrop, LLP  
725 South Figueroa Street, Ste. 2800  
Los Angeles, CA 90017  
(213) 488-7111  
**Attorneys for JOHNSTON**  
**DEFENDANTS**

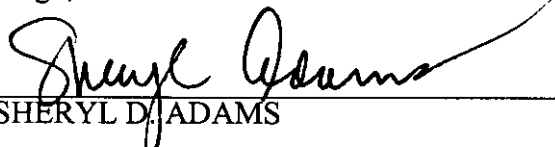
16 ( ) **BY PERSONAL SERVICE:** I placed a true copy of the above documents in a sealed envelope  
17 clearly labeled to identify the attorney for the party being served, and personally caused said such  
18 envelope to be personally delivered by hand by DLS Attorney Service, leaving a copy with the  
receptionist or other person in charge at the office of each addressee named hereafter:

19 ( ) **BY FACSIMILE:** I declare that upon the prior agreement of the party being served, I served  
20 the above named documents by facsimile transmission during usual office hours **from facsimile**  
21 **number (619) 239-5601**, to a facsimile machine maintained by the person on whom it is served and  
that the transmission was reported as complete and without error. Thereafter, I mailed (by first-  
class mail, postage prepaid) a true copy to each addressee named hereafter:

22 ( ) **STATE:** I declare under penalty of perjury under the laws of the State of California that the  
23 foregoing is true and correct and that this declaration was executed on **November 1, 2002**.

24 (  ) **FEDERAL:** I hereby certify that I am employed in the office of a member of the Bar of the  
Court at whose direction this service was made.

25 Executed **November 1, 2002**, at San Diego, California.

26   
27 \_\_\_\_\_  
28 SHERYL D. ADAMS