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

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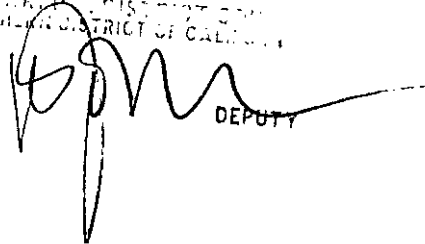
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COURT REPORTER
SOUTHERN DISTRICT OF CALIFORNIA

BY:



DEPUTY

1 Stephen D. Alexander (SBN 141099)
2 Susan C. Chun (SBN 193364)
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9 Attorneys for Plaintiff
THE SOCIETY OF LLOYD'S

10 UNITED STATES DISTRICT COURT
11 SOUTHERN DISTRICT OF CALIFORNIA

"By Fax"

12 THE SOCIETY OF LLOYD'S,

Case No. 02 CV 0448 J (AJB)

13 Plaintiff,

**ADDENDUM TO EX PARTE
APPLICATION FOR ORDER
DIRECTING ENTRY OF
JUDGMENTS**

14 v.

15 ROBERT C. BLACKWELL, SAMME JO BRADY,
16 COCO ALEXANDRA ELIZABETH CARTER,
17 JOHN R. DOUGERY, JOSEPH MELVIN
GAGLIARDI, HARRY WALTER GORST,
18 FREDERICK GORDON GRAEBER, MICHAEL
CALVIN HIRSH, IVARS RALPH JANIEKS,
19 ROWLAND WILLIAM JOHNSTON, WILLIAM
DOBSON KILDUFF, JANE ELIZABETH LAMB,
20 DONALD RUDOLPH LAUB, FRANK F. S. LIN,
ROBERT KRAMER LOWRY, GEOFFREY O.
21 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,
26 BENEFICIARIES AND TRUSTEES OF THE
TRUST OF DELMAR ABSHER BRADY'S
ESTATE,

27 Defendants.

OK MCT
FRIED, FRANK, HARRIS, SHRIVER & JACOBSON
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Los Angeles, CA 90071-3406

134

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ADDENDUM

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On March 21, 2003, Plaintiff The Society of Lloyd's ("Plaintiff") filed an *Ex Parte* Application for the Entry of Judgments against Defendants Robert C. Blackwell, Samme Jo Brady, 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, and Peter Francis Zinsli (collectively, "Defendants"). The Declaration of Stephen D. Alexander was filed in support of Plaintiff's Application. Exhibit A to that Declaration, a copy of the letter providing formal notice of the Application to Defendants' counsel, however, was inadvertently omitted from the Application filed with the Court on March 21, 2003, and is filed herewith as Exhibit A to this Addendum.

#83709

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March 21, 2003

VIA FACSIMILE and U.S. MAIL

Theodore W. Grippo, Jr., Esq.
Three First National Plaza
70 West Madison Street
Suite 2315
Chicago, IL 60602-4206

Greg John Ryan, Esq.
Law Office of Greg John Ryan
1010 Second Avenue, Suite 2500
San Diego, California 92101

FRIED
FRANK
HARRIS
SHRIVER &
JACOBSON

Re: The Society of Lloyds v. Blackwell, et al; Case No. 02 CV 0448 J (AJB)

Dear Ted and Greg:

As we discussed at the March 17, 2003, Case Management Conference, Lloyd's will be filing today an *Ex Parte* Application for an Order Directing Entry of Judgments against your clients, the defendants against whom the Court granted Summary Judgment on February 24, 2003. Lloyd's application will be filed as an *ex parte* motion pursuant to the Court's permission.

We will serve you with copies of our filing by fax and mail.

Very truly yours,


Stephen D. Alexander

SDA/pf

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EXHIBIT A

83691

TTI

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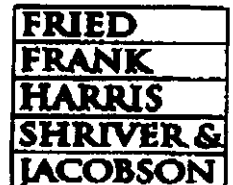
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FAX COVER SHEET

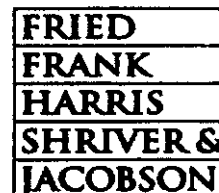
Date: March 21, 2003
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Sender's Phone: 213.473.2008
Sender's Fax: 213.473.2222
Sender's Email: florepa@ffhsj.com
 alexast@ffhsj.com
Number of Pages (including cover sheet): 2



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FAX COVER SHEET

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Sender's Email: florepa@ffhsj.com
alexast@ffhsj.com
Number of Pages (including cover sheet): 2



<u>Recipient</u>	<u>Company</u>	<u>Fax</u>	<u>Phone</u>
Theodore W. Grippo	Lindenbaum Coffman Kurlander & Brisky, Ltd.	312-855-4423	312-855-4420
Greg John Ryan	Law Offices of Greg John Ryan	619-239-8858	619-239-4848

Re: Lloyd's v. Blackwell

Comments:

#79271

If you have any problems receiving this transmission, please contact us at 213.473.2035

Confidentiality Notice:

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1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3 COUNTY OF LOS ANGELES) SS

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

6 On March 21, 2003, I served the following documents described as: **EX PARTE**
7 **APPLICATION FOR ORDER DIRECTING ENTRY OF JUDGMENT;**
8 **MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF**
STEPHEN D. ALEXANDER IN SUPPORT THEREOF; PROPOSED ORDER on the
parties in this action by:

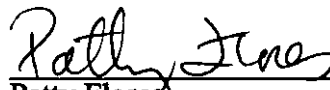
9 **(BY FACSIMILE)** I sent such document from facsimile machine 213.473.2222
10 on March 21, 2003. I certify that said transmission was completed and that all
11 pages were received and that a report was generated by facsimile machine
213.473.2222 which confirms said transmission and receipt.

12 **BY U.S. MAIL.** I am "readily familiar" with the firm's practice of collection and
13 processing correspondence for mailing. Under that practice it would be deposited
14 with U.S. postal service on that same day with postage thereon fully prepaid at , in
15 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.

16 **FEDERAL:** I declare that I am employed in the office of a member of the bar of
this court whose direction the service was made.

17 Greg J. Ryan, Esq. 18 LAW OFFICES OF GREG J. RYAN, APLC 19 1010 Second Avenue, Suite 2500 San Diego, CA 92101	Theodore W. Grippo, Jr. LINDENBAUM COFFMAN, KURLANDER BRISKY & GRIPPO, LTD Three First National Plaza, Suite 2315 Chicago, Illinois 60602-4206
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21 Executed on March 21, 2003, at Los Angeles, California.

22 
23 Patty Flores
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FRIED, FRANK, HARRIS, SHRIVER & JACOBSON
350 South Grand Avenue, Suite 3200
Los Angeles, CA 90071-3406