

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

In re:

ESTATE OF A. CARY HARRISON, III,

Case No. 8:08-bk-07002-KRM
Chapter 15

Debtor in a Foreign Proceeding.

Declaration of Randolph Cary Harrison, son of the late A Cary Harrison III

I declare, under penalty of perjury, as follows:

I am the duly appointed personal representative of the Florida probate estate of Cary Harrison. As his son and as the personal representative of his estate, I have personal knowledge of his life and of all facts set forth in this Declaration, all of which are true and correct.

My father, A Cary Harrison III was born August 26, 1931 in Richmond, Virginia, to American parents, Archibald Cary Harrison, Jr., and Lucile Marshall Butler, and to a family of lengthy American ancestry, including a signer of the Declaration of Independence, Virginia governors, and two US Presidents.

My father was raised and attended public schools at several locations in Virginia. He married my mother, Marie Bondurant Swecker, a high school classmate in Wytheville, Virginia. I was their only child (they later divorced). After service in the US Army and an Honorable Discharge, he graduated from Hampden-Sydney College, where he played on the football team, in Farmville, Virginia (1956). He obtained a Master's of Business Administration at Columbia University (1958) in New York City, New York and began a career in investment banking there with Hanover Bank. We lived in New York City and Westchester County, New York, and made frequent visits to Virginia to visit family in those years. In the early 1970's his then employer, Lehman Brothers, sent him overseas to open a London office, at which time he began part-time residence in England. Several years later he left banking to consult and manage his investments, primarily commercial and rental property in Florida, which provided the majority of his income. He bought a strip shopping plaza in Holiday, Pasco County, Florida, in 1978, and physically maintained and personally managed it from his Dunedin, Florida home (purchased in 1977, sold in 1998), and soon thereafter his Treasure Island, Florida home (which he had purchased in 1979, and also served as a personal office). He maintained multiple bank accounts and held stocks and shares in Florida. In the 1980's he obtained a real estate license in Florida and worked as a broker for Whitbread-Nolan of Tampa, Florida. He was an avid Tampa Bay area booster and Buccaneer fan. He loved the waters of Florida,

dreamed of owning a sailboat, and participated in US Coast Guard Auxiliary and St. Petersburg Singles Sailing Club activities.

Throughout my father's life he owned, maintained, and lived part-time, or more, at, one or more, US residences in New York, Connecticut, and Florida; paid US federal, state and local taxes; and maintained a US passport, US state driver's licenses and US state voter registrations. As an adult, he always owned a vehicle in the US for personal use, including, lastly, a 1998 GMC van, that he had bought new, registered in Florida, and expected to use for a long time, including trips to see his mother in Virginia.

All of my father's relatives are US citizens and all live in America. I live in Maine. His mother, at a continuing care facility in Virginia Beach, outlived him (living into her 100's, as her mother before had). His only sibling, William Allen Harrison, and his wife Sandra, are residents of Jupiter, Florida. He had two Florida first cousins, six Virginia first cousins, and one Indiana first cousin, and three nephews, with families, in Virginia, North Carolina, and Pennsylvania. He had many friends and acquaintances in Florida, and scattered throughout the United States, as well as worldwide, as he traveled the world extensively throughout his life.

My father was cremated following his unexpected death at age 71 in England. I hand-carried (by overseas airline flight, etc) his ashes to the United States, and hand-buried them next to his father (my grandfather), in the family burial plot, at the Memorial Service at Old Trinity/St James Church in Matthews County, Virginia, on October 11, 2003, in the presence of numerous family members and friends. (My grandmother was also cremated and buried next to Dad on October 11 [coincidentally] 2004 following her death September 29, 2004.)

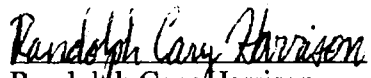
My father expected to return to the United States, where he was eligible for and received US social security and medical benefits, at, or around, the age of 65, but was prevented by his involvement in the Lloyd's controversy, which followed his recruitment as a Name by The Society of Lloyd's in 1989, intensified in the mid-1990's, and enmeshed him in protracted litigation (which he conducted primarily on his own, as a litigant in person, but also, at times, in consultation with Solicitor James S. Barnett), draining his resources and spirit. At the time of his unexpected death that involvement had continued to impede his intended return to full-time residence at his home on Lagoon Lane in Treasure Island. Many who knew Dad believed that his premature death was a result of that involvement. As recently as last week, my partner and I spoke with a neighbor at Lagoon Lane who spontaneously brought up her memories of speaking with my father as he did yard work, and hearing him say that he wanted to be free of England and come home permanently.

On April 19, 2005 I presented my father's will, naming me (and my grandmother, by then deceased) as executor, and the necessary documents to open the US probate estate (Case # 05-3103 ES) in Pinellas County Probate Court in Clearwater, Florida. Probate was granted May 18, 2005. The assets in Florida, including the shopping plaza in Holiday, and the residence in Treasure Island, have always been part of the Florida probate estate except that the Treasure Island property has been determined to be my father's homestead by order of the Florida probate court dated August 7, 2007. Accordingly, such property

was transferred to me pursuant to the Florida probate court's order. The Florida probate court has and continues to exercise jurisdiction over the Florida assets. All legal counsel involved, including in England, had declared that my father was a Florida domicile. In my dealings with Solicitor Barnett I have never waived the attorney-client privilege individually or as personal representative of my father's probate estate. To my knowledge, my father never waived the attorney-client privilege with Mr. Barnett either. I have at all times endeavored to comply with Florida law and to fulfill, with the help and support of my partner, the duties of personal representative to the best of my knowledge, ability, and understanding.

I, Randolph C. Harrison, hereby declare under penalty of perjury pursuant to the laws of the United States that the above declarations are true and correct to the best of my knowledge.

Signed,

A handwritten signature in cursive script that reads "Randolph Cary Harrison".

Randolph Cary Harrison

March 30, 2009