

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.)

**DEFENDANTS ROBERT W. FUERST, HORD HARDIN II,
WALTER A. KLEIN, MEADE M. McCAIN, CYNTHIA J. TODOROVICH
AND MICHAEL B. TODOROVICH'S REPLY TO
PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

COME NOW Defendants Robert W. Fuerst, Hord Hardin II, Walter A. Klein, Meade M. McCain, Cynthia J. Todorovich and Michael B. Todorovich ("Defendants") and for their reply to Plaintiff's Motion for Summary Judgment state: Defendants incorporate by reference their Response, Evidentiary Objections and Counterstatements of Defendants Robert W. Fuerst, Hord Hardin II, Walter A. Klein, Meade M. McCain, Cynthia J. Todorovich and Michael B. Todorovich to Plaintiff's Statement of Undisputed Material Fact in this Reply as if fully set out herein.

WHEREFORE, Defendants Robert W. Fuerst, Hord Hardin II, Walter A. Klein, Meade M. McCain, Cynthia J. Todorovich and Michael B. Todorovich pray an order of this Court denying Plaintiff's Motion for Summary Judgment.

LAW OFFICES OF TED F. FRAPOLLI

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Hord Hardin II

CERTIFICATE OF SERVICE

I certify that on the 15th day of April, 2004, 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, Missouri 63101; Alan C. Kohn, Esq., Attorney for Defendant Shillington, One US Bank Plaza, Suite 2410, St. Louis, Missouri 63101; Blake T. Hannafan, Esq., Michael T. Hannafan & Associates, Ltd., One East Wacker Drive, Suite 1208, Chicago, IL 60601; and Harold F. Ilg, 100 L'Amiance Circle, Unit 202, Naples, Florida 34108.

/s/ Ted F. Frapolli