

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

<b>THE SOCIETY OF LLOYD’S,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
v.	)	<b>Case No: 4:03CV01113HEA</b>
	)	
<b>ROBERT W. FUERST, et al.,</b>	)	
	)	<b>(Judge Autrey)</b>
	)	
<b>Defendants.</b>	)	

**THE SOCIETY OF LLOYD’S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS**

The Society of Lloyd’s, by its attorneys, and pursuant to Missouri Supreme Court Rules 76.28 and 58.01 requests that the Defendants, Robert W. Fuerst, Hord Hardin, Walter A. Klein, Meade M. McCain, Cynthia J. Todorovich and Michael B. Todorovich, produce the following documents at the offices of Michael T. Hannafan & Associates, Ltd., One East Wacker Drive, Suite 1208, Chicago, IL, 60601, within 28 days from the date hereof.

**DEFINITIONS**

1. The term “Defendants” means Robert W. Fuerst, Hord Hardin, Walter A. Klein, Meade M. McCain, Cynthia J. Todorovich and Michael B. Todorovich.
  
2. The term “documents” as used herein means all original written, recorded or graphic matters whatsoever and all copies thereof, including, but not limited to papers, books, record, letters, tangible things, correspondence, communications, telegrams, cables, telex messages, memoranda, notes, notations, work papers, transcripts, minutes, reports and recordings of telephone or other meetings, affidavits, statements, summaries, opinions, reports, studies, analysis, evaluations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, advertisements, instruction, charts, manuals, brochures, publications, schedules, journals, statistical records, desk calendars, appointment books, diaries, lists, tabulations, sound recordings, computer printouts, all records kept by electronic, photographic, or mechanical means, any notes or drafts relating to the foregoing, all pleadings and other papers filed with any state or federal agency, witness statements, and all things similar to any of the foregoing

however denominated. In all cases where original or non-identical copies are available, "document" also means identical copies or original documents and non-identical copies thereof.

3. "Relate to" or "relating to" as used herein means, in addition to the customary and usual meaning, discuss or discussing, refer or referring, reflect or reflecting, assess or assessing, record or recordings, mentioning and touching upon.

4. "Concern" or "concerning" as used herein means, in addition to the customary and usual meaning, discuss or discussing, refer or referring, reflect or reflecting, assess or assessing, record or recordings, mentioning and touching upon.

5. The terms "and" and "or" shall be interpreted in every instance as meaning "and/or" and shall in neither instance be interpreted disjunctively to exclude any document or information otherwise within the scope of any description or request made in these requests.

6. As used in these requests, the singular shall be deemed to include the plural, and the plural shall be deemed to include the singular. The functional words "each", "every", "any", and "all" shall be deemed to include all of the other functional words, as necessary to bring within the scope of this request any documents that might otherwise be construed to be outside the scope of these requests.

7. The time frame for these requests is from January 1, 1996, to the present, unless otherwise indicated.

### **REQUESTS TO PRODUCE**

1. All deeds, land contracts or such other documents evidencing an ownership interest of Defendants in any real property.

#### **RESPONSE:**

2. All bills of sale, certificates of title, lists, appraisals, ledgers or such other documents evidencing an ownership interest of Defendants in any machinery, equipment, motor vehicles, office equipment, furniture, fixtures and any other tangible personal property (other than miscellaneous supplies).

#### **RESPONSE:**

3. All documents evidencing or relating to the sale or transfer of an ownership interest in any real property or personal property of Defendants.

**RESPONSE:**

4. All business journals, records or other documents evidencing and itemizing current accounts receivable of Defendants.

**RESPONSE:**

5. All business journals, records or other documents evidencing and itemizing all outstanding debts of Defendants.

**RESPONSE:**

6. All monthly or other periodic statements of account with every banking or other financial institutions of Defendants.

**RESPONSE:**

7. Any check register or other similar business record or journal and canceled checks of Defendants.

**RESPONSE:**

8. All documents evidencing the interest of Defendants in other business operations including, but not limited to, corporations, partnerships, limited liability companies or sole proprietorships, including the name of the entity, its address and the particular interest in the entity.

**RESPONSE:**

9. All leases of personal and real property wherein the Defendants is currently either a lessor or a lessee.

**RESPONSE:**

10. All federal and state tax returns for the past five years filed by Defendants and any entity in which the Defendants have an interest.

**RESPONSE:**

11. All documents relating to any employee benefit plan (such as pension plan, profit sharing plan, 401(k), etc.).

**RESPONSE:**

12. The address and list of contents of any safe deposit box.

**RESPONSE:**

13. All documents or other evidence of a wire transfer, cashier check, or similar payment instrument/method in connection with the transfer of any real or personal property by Defendants, including identification of the name of the payee.

**RESPONSE:**

14. All documents or other evidence indicating, concerning or relating to the name and location of any entity or individual in possession of any asset of Defendants.

**RESPONSE:**

15. All monthly or other periodic statements of account with every brokerage institution, Securities Dealer, Broker, Financial Planner or Insurance Representative of Defendants.

**RESPONSE:**

16. All documents or other evidence of any and all investment portfolios, including but not limited to, stocks, bonds, REITs, insurance products, partnership interests, limited liability memberships or other investments.

**RESPONSE:**

17. All documents relating to any trust of which Defendants are a beneficiary or settlor.

**RESPONSE:**

18. Any documents relating to defendants' interest in an insurance policy.

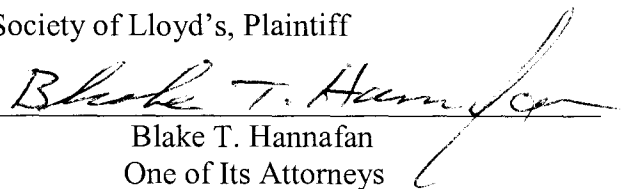
**RESPONSE:**

19. Any document relating to alimony, maintenance, support and property settlements to which Defendants are entitled.

**RESPONSE:**

The Society of Lloyd's, Plaintiff

By:

  
Blake T. Hannafan  
One of Its Attorneys

Dated: August 30, 2004

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