

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

THE SOCIETY OF LLOYD'S,
Plaintiff,

v.

BRUCE G. SUNDLUN,
Defendant.

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C.A. No. 06-106

ANSWER

Defendant, Bruce G. Sundlun, by and through his counsel, answers Plaintiff's Complaint as follows:

1. Admitted.

2. Admit only that defendant is a citizen of the United States who resides in Jamestown, Rhode Island, and deny the remaining allegations.

3. Defendant admits that Plaintiff is a citizen of the United Kingdom and that Defendant is a citizen of Rhode Island. Paragraph 3 states legal conclusions to which no response is required. To the extent that the remainder of Paragraph 3 contains factual allegations, they are denied.

4. Paragraph 4 states legal conclusions to which no response is required. To the extent that Paragraph 4 contains factual allegations, they are denied.

5. Defendant is without sufficient information to admit or deny the allegations in this Paragraph, and therefore they are denied.

6. Defendant is without sufficient information to admit or deny the allegations in this Paragraph, and therefore they are denied.

7. Defendant is without sufficient information to admit or deny the allegations in this Paragraph, and therefore they are denied.

8. Defendant is without sufficient information to admit or deny the allegations in this Paragraph, and therefore they are denied.

9. Paragraph 9 states legal conclusions to which no response is required. To the extent that the Paragraph 9 contains factual allegations, they are denied.

10. Defendant is without sufficient information to admit or deny the allegations in this Paragraph, and therefore they are denied.

11. Defendant is without sufficient information to admit or deny the allegations in this Paragraph, and therefore they are denied.

12. Defendant is without sufficient information to admit or deny the allegations in this Paragraph, and therefore they are denied.

13. Defendant states that the reconstruction and renewal plan is a written document that speaks for itself. Defendant denies all allegations in Paragraph 13 to the extent that they do not fully and accurately characterize that written document.

14. Defendant states that the reconstruction and renewal plan is a written document that speaks for itself. Defendant denies all allegations in Paragraph 14 to the extent that they do not fully and accurately characterize that written document or to the extent that they purport to characterize Defendant's legal obligations.

15. Denied.

16. Admitted.

17. Defendant is without sufficient information to admit or deny the allegations in this Paragraph, and therefore they are denied.

18. Admitted.

19. Admitted.

20. Paragraph 20 states legal conclusions to which no response is required. To the extent that Paragraph 20 contains factual allegations, they are denied.

21. Paragraph 21 states legal conclusions to which no response is required. To the extent that Paragraph 21 contains factual allegations, they are denied.

FIRST AFFIRMATIVE DEFENSE

The judgment on which Plaintiff is suing is void for insufficient service of process in connection with the action that led to the entry of the foreign judgment against him.

SECOND AFFIRMATIVE DEFENSE

The judgment on which Plaintiff is suing is void for want of personal jurisdiction over Defendant in connection with the action that led to the entry of the foreign judgment against him.

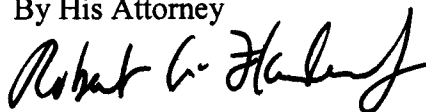
THIRD AFFIRMATIVE DEFENSE

Failure to state a claim upon which relief can be granted.

WHEREFORE, Defendant prays that the Court grant the following relief:

- (a) Deny and dismiss each claim in Plaintiff's Complaint with prejudice;
- (b) Award Defendant his costs and fees, including reasonable attorneys' fees; and
- (c) Grant such other relief as the Court deems just and proper.

BRUCE SUNDLUN¹
By His Attorney



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Dated: April 21, 2006


¹ Defendant does not utilize his middle initial.

CERTIFICATION

TO:

Matthew T. Oliverio, Esq.
Oliverio & Marcaccio LLP
55 Dorrance Street, Suite 400
Providence, RI 02903

I hereby certify that I mailed a copy of the within Answer to the attorney of record, as listed above, on this 21st day of April, 2006.



#708663-P-v3 (47702-127777)