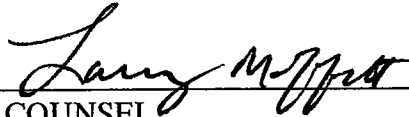


WHEREFORE, PREMISES CONSIDERED, Defendants respectfully request that this Court stay the proceedings in this action and compel plaintiff to submit to binding arbitration and deny plaintiff's Motion to Stay Arbitration.

Respectfully submitted,

RICHARD SCRUGGS, Individually; DON BARRETT, Individually; SCRUGGS LAW FIRM, P.A.; BARRETT LAW OFFICE, P.A.; NUTT & McALISTER, PLLC; and LOVELACE LAW FIRM, P.A.

BY:


OF COUNSEL

LARRY D. MOFFETT - BAR # 3401
WILTON V. BYARS, III - BAR # 9335
SHEA S. SCOTT - BAR # 100775
DANIEL COKER HORTON & BELL, P.A.
OXFORD SQUARE NORTH
265 NORTH LAMAR BOULEVARD, SUITE R
POST OFFICE BOX 1396
OXFORD, MS 38655-1396
(662) 232-8979

CERTIFICATE

I, Larry D. Moffett, of counsel for Defendants, do hereby certify that I have this day transmitted, via hand delivery, a true and correct copy of the above and foregoing pleading to:

Grady F. Tollison, Jr., Esq.
Tollison Law Firm
100 Courthouse Square
Oxford, MS 38655

THIS, the 26th day of April, 2007.


LARRY D. MOFFETT

IN THE CIRCUIT COURT OF LAFAYETTE COUNTY, MISSISSIPPI

JONES, FUNDERBURG, SESSUMS,
PETERSON & LEE, LLC

PLAINTIFF

VS.

CIVIL ACTION NO. L07-135

RICHARD SCRUGGS, Individually;
DON BARRETT, Individually; SCRUGGS
LAW FIRM, P.A.; BARRETT LAW
OFFICE, P.A.; NUTT & McALISTER, PLLC;
and LOVELACE LAW FIRM, P.A.

DEFENDANTS

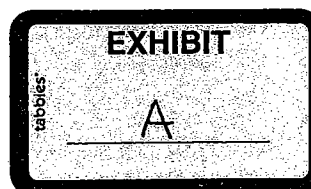
AFFIDAVIT OF MEG M. GRANTHAM

STATE OF MISSISSIPPI

COUNTY OF LAFAYETTE

BEFORE ME, the undersigned authority, personally appeared Meg M. Grantham, who being by me first duly sworn, deposes and says on oath as follows:

1. My name is Meg M. Grantham. I am over the age of twenty-one years, am competent to make this affidavit, and have personal knowledge of the matters set forth herein.
2. I am the controller for Scruggs Law Firm, P.A.
3. The law firm of Jones, Funderburg, Sessums, Peterson & Lee, LLC represented Richard Scruggs in a lawsuit styled *Wilson, et al. v. Scruggs, et al.*
4. I have reviewed the invoices submitted by Jones, Funderburg, Sessums, Peterson & Lee, LLC (and its predecessor, Jones, Funderburg, Sessums & Peterson, PLLC) including fees for legal services rendered in *Wilson* during the period October 2005 through September 2006. True and correct copies of redacted bills for the time period from October 2005 through September 2006 are attached collectively as Exhibit '1' hereto.



FURTHER, AFFIANT SAYETH NOT.

Executed this 26 day of April, 2007.

Meg M. Grantham
MEG M. GRANTHAM

Subscribed and sworn to before me this 26 day of April, 2007, by MEG M.
GRANTHAM.

MY COMMISSION EXPIRES
February 25, 2011



Holly Mooney
NOTARY PUBLIC

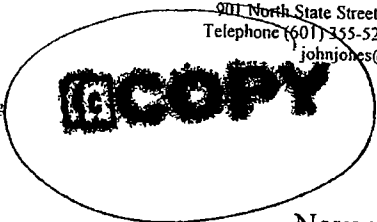
five to be
to put w/ others

JONES, FUNDERBURG, SESSUMS & PETERSON

Attorneys at Law
901 North State Street · Jackson, Mississippi 39202
Telephone (601) 355-5200 · Telecopier (601) 355-5400
johnjones@jfsplawfirm.com

RECEIVED
NOV 04 2005

John Griffin Jones
Steven H. Funderburg
Craig R. Sessums
G. Davis Peterson



Mailing Address:
Post Office Box 13960
Jackson, Mississippi 39236-3960

November 2, 2005

Rex Deloach
Scruggs Legal, P.A.
Post Office Box 1136
Oxford, Mississippi 38655

VIA FAX (662-234-7615) AND U.S. MAIL

NOV 07 2005

RE: William Roberts Wilson, Jr. and William Roberts Wilson, Jr., P.A.
and Alwyn H. Luckey v. Richard F. Scruggs, Richard F. Scruggs, P.A.,
Scruggs, Millette, Bozeman, & Dent, P.A. and Asbestos Group, P.A.
Civil Action Nos.: 1:05cv89JAD and 251-94-582-CIV


Dear Friends:

Enclosed is our bill for services 10/01/05 to 10/31/05. Please place in line for payment.

Thank you very much.

Sincerely yours,

JONES, FUNDERBURG,
SESSUMS & PETERSON, PLLC

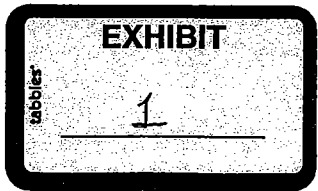


John Griffin Jones

JGJ/bk

Enclosures

Cc: Richard F. Scruggs, Esquire
Jack F. Dunbar, Esquire



**WILLIAM ROBERTS WILSON, JR. AND
WILLIAM ROBERTS WILSON, JR., P.A.**

PLAINTIFFS

AND

ALWYN H. LUCKEY

INTERVENOR

VS.

**CIVIL ACTION NOS.: 1:05CV89JAD
251-94-582-CIV**

**RICHARD F. SCRUGGS, RICHARD F.
SCRUGGS, P.A., SCRUGGS, MILLETTE,
BOZEMAN, & DENT, P.A. AND ASBESTOS
GROUP, P.A.**

DEFENDANTS

BILL FOR LEGAL SERVICES 10/01/05 TO 10/31/05

10/03/05	SHF	2.7
10/04/05	SHF	3.4
10/05/05	JGJ	1.5
10/06/05	JGJ	3.0
	SHF	1.2
10/07/05	SHF	.5
10/09/05	SHF	1.6
10/10/05	JGJ	3.25

	SHF	8.4
10/11/05	JGJ	3.5
	SHF	.6
10/13/05	SHF	1.4
10/17/05	JGJ	4.0
	SHF	6.7
10/18/05	JGJ	4.5
	SHF	.5
10/19/05	JGJ	5.75
	SHF	2.0
10/20/05	SHF	2.1
10/21/05	JGJ	2.0

SHF 2.3

10/24/05 JGJ 5.75

SHF 10.4

10/25/05 JGJ 6.5

SHF 8.6

10/26/05 SHF .6

10/27/05 SHF 2.7

10/28/05 JGJ 2.75

SHF 1.8

10/31/05 JGJ 1.5

JGJ 44.00 @

SHF 57.50 @

TOTAL:

EXPENSE STATEMENT

Copies and postage expenses (itemization attached)

TOTAL EXPENSES:

BALANCE DUE:

DEC 01 2005

JONES, FUNDERBURG, SESSUMS & PETERSON, PLLC

Attorneys at Law
911 North State Street - Jackson, Mississippi 39202
Telephone (601) 355-5200 - Telecopier (601) 355-5400
johnjones@jfkplawfirm.com

John Griffin Jones
Steven H. Funderburg
Craig R. Sessums
G. Davis Peterson

Mailing Address:
Post Office Box 13960
Jackson, Mississippi 39216 3960

December 1, 2005

VIA FAX (662-234-7615) AND U.S. MAIL

Rex Deloach
Scruggs Legal, P.A.
Post Office Box 1136
Oxford, Mississippi 38655

RE: William Roberts Wilson, Jr. and William Roberts Wilson, Jr., P.A.
and Alwyn H. Luckey v. Richard F. Scruggs, Richard F. Scruggs, P.A.,
Scruggs, Millette, Bozeman, & Dent, P.A. and Asbestos Group, P.A.
Civil Action Nos.: 1:05cv89JAD and 251-94-582-CIV

Dear Friends:

Enclosed is our bill for services 11/01/05 to 11/30/05. Please place in line for payment.

Thank you very much.

Sincerely yours,

JONES, FUNDERBURG,
SESSUMS & PETERSON, PLLC


John Griffin Jones

JGJ/bk

Enclosures

Cc: Richard F. Scruggs, Esquire
Jack F. Dunbar, Esquire

12/19/05
ok to pay
Per TC
JLH

**WILLIAM ROBERTS WILSON, JR. AND
WILLIAM ROBERTS WILSON, JR., P.A.**

PLAINTIFFS

AND

ALWYN H. LUCKEY

INTERVENOR

VS.

**CIVIL ACTION NOS.: 1:05CV89JAD
251-94-582-CIV**

**RICHARD F. SCRUGGS, RICHARD F.
SCRUGGS, P.A., SCRUGGS, MILLETTE,
BOZEMAN, & DENT, P.A. AND ASBESTOS
GROUP, P.A.**

DEFENDANTS

BILL FOR LEGAL SERVICES 11/01/05 TO 11/30/05

11/01/05 SHF 1.6

11/02/05 JGJ 2.5

SHF 3.0

11/03/05 SHF 7.4

11/04/05 JGJ 4.25

SHF 4.4

11/05/05 SHF 3.1

11/07/05 STIF .7

11/08/05 SIF 2.6

11/09/05 SHF 1.2

11/14/05 SHF 3.4

11/15/05 JGJ 2.0

SIF 4.2

11/16/05 JGJ 4.75

SHF 3.0

11/17/05 SHF 1.9

11/21/05 JGJ 5.5

SHF 9.8

11/22/05 JGJ 2.75

SHF 10.3

11/27/05 SHF 5.3

11/28/05 JGJ 6.5

SIIF 5.5

11/29/05 JGJ 4.5

SHF 10.3

11/30/05 SHF 1.9

JGJ 32.75 @

SHF 79.60 @

TOTAL:

EXPENSE STATEMENT

Copies and postage expenses (itemization attached)

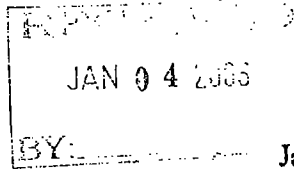
TOTAL EXPENSES:

BALANCE DUE:

JONES, FUNDERBURG, SESSUMS & PETERSON, PLLC

Attorneys at Law
901 North State Street · Jackson, Mississippi 39202
Telephone (601) 355-5200 · Telecopier (601) 355-5400
johnjones@jfsplawfirm.com

John Griffin Jones
Steven H. Funderburg
Craig R. Sessums
G. Davis Peterson



Mailing Address:
Post Office Box 13960
Jackson, Mississippi 39236-3960

January 4, 2006

Rex Deloach
Scruggs Legal, P.A.
Post Office Box 1136
Oxford, Mississippi 38655

VIA FAX (662-234-7615) AND U.S. MAIL.

RE: William Roberts Wilson, Jr. and William Roberts Wilson, Jr., P.A.
and Alwyn H. Luckey v. Richard F. Scruggs, Richard F. Scruggs, P.A.,
Scruggs, Millette, Bozeman, & Dent, P.A. and Asbestos Group, P.A.
Civil Action Nos.: 1:05cv89JAD and 251-94-582-CIV

Dear Friends:

Enclosed is our bill for services 12/01/05 to 12/31/05. Please place in line for payment.

Thank you very much.

Sincerely yours,

JONES, FUNDERBURG,
SESSUMS & PETERSON, PLLC

John Griffin Jones

JGJ/bk

Enclosures

Cc: Richard F. Scruggs, Esquire
Jack F. Dunbar, Esquire

**WILLIAM ROBERTS WILSON, JR. AND
WILLIAM ROBERTS WILSON, JR., P.A.**

PLAINTIFFS

AND

ALWYN H. LUCKEY

INTERVENOR

VS.

**CIVIL ACTION NOS.: 1:05CV89JAD
251-94-582-CIV**

**RICHARD F. SCRUGGS, RICHARD F.
SCRUGGS, P.A., SCRUGGS, MILLETTE,
BOZEMAN, & DENT, P.A. AND ASBESTOS
GROUP, P.A.**

DEFENDANTS

BILL FOR LEGAL SERVICES 12/01/05 TO 12/31/05

12/01/05 SHF .8

12/15/05 JGJ 3.5

12/16/05 JGJ 4.25

SHF .9

12/18/05 SHF .2

12/19/05 JGJ 1.5

SHF 4.5

12/20/05	JGJ	7.0
	SHF	7.5

12/21/05	SHF	1.5
----------	-----	-----

12/22/05	JGJ	3.5
----------	-----	-----

	SHF	.5
--	-----	----

12/23/05	JGJ	1.25
----------	-----	------

	SHF	2.5
--	-----	-----

12/25/05	SHF	.1
----------	-----	----

12/26/05	SHF	.1
----------	-----	----

12/27/05	JGJ	2.75
----------	-----	------

12/28/05	JGJ	2.5
----------	-----	-----

	SHF	1.5
--	-----	-----

12/29/05	JGJ	2.0
----------	-----	-----

	SHF	3.1
--	-----	-----

JGJ 28.25 @

SHF 23.20 @

TOTAL:

EXPENSE STATEMENT

Copies and postage expenses (itemization attached)

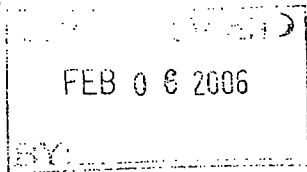
TOTAL EXPENSES:

BALANCE DUE:

JONES, FUNDERBURG, SESSUMS & PETERSON, PLLC

Attorneys at Law
901 North State Street · Jackson, Mississippi 39202
Telephone (601) 355-5200 · Telecopier (601) 355-5400
johnjones@jfsplawfirm.com

John Griffin Jones
Steven H. Funderburg
Craig R. Sessums
G. Davis Peterson



Mailing Address:
Post Office Box 13960
Jackson, Mississippi 39236-3960

February 2, 2006

Rex Deloach
Scruggs Legal, P.A.
Post Office Box 1136
Oxford, Mississippi 38655

VIA FAX (662-234-7615) AND U.S. MAIL

RE: William Roberts Wilson, Jr. and William Roberts Wilson, Jr., P.A.
and Alwyn H. Luckey v. Richard F. Scruggs, Richard F. Scruggs, P.A.,
Scruggs, Millette, Bozeman, & Dent, P.A. and Asbestos Group, P.A.
Civil Action Nos.: 1:05cv89JAD and 251-94,582-CIV


Dear Friends:

Enclosed is our bill for services 01/01/06 to 01/31/06. Please place in line for payment.

Thank you very much.

Sincerely yours,

JONES, FUNDERBURG,
SESSUMS & PETERSON, PLLC


John Griffin Jones

JGJ/bk

Enclosures

Cc: Richard F. Scruggs, Esquire
Jack F. Dunbar, Esquire

**WILLIAM ROBERTS WILSON, JR. AND
WILLIAM ROBERTS WILSON, JR., P.A.**

PLAINTIFFS

AND

ALWYN H. LUCKEY

INTERVENOR

VS.

**CIVIL ACTION NOS.: 1:05CV89JAD
251-94-582-CIV**

**RICHARD F. SCRUGGS, RICHARD F.
SCRUGGS, P.A., SCRUGGS, MILLETTE,
BOZEMAN, & DENT, P.A. AND ASBESTOS
GROUP, P.A.**

DEFENDANTS

BILL FOR LEGAL SERVICES 01/01/06 TO 01/31/06

01/02/06 JGJ 1.5

SHF 4.6

01/03/06 JGJ 3.0

SHF 7.9

01/04/06 SHF 6.8

01/05/06 JGJ 1.5

SHF 9.0

01/06/06 SHF 3.7

01/08/06 SHF 5.2

01/09/06 JGJ 2.5

SHF 9.0

01/10/06 JGJ 6.5

SHF 10.4

01/11/06 JGJ 11.5

SHF 8.0

01/12/06 JGJ 9.75

SHF 10.0

01/13/06 JGJ 7.5

SHF 7.0

01/14/06 JGJ 2.5

SHF 1.4

01/15/06 SHF 3.0

01/16/06 JGJ 6.25

SHF 7.8

01/17/06 JGJ 8.5

SHF 10.0

01/18/06 JGJ 9.25

SHF 12.3

01/19/06 JGJ 7.0

SHF 8.0

01/20/06 JGJ 4.5

SHF .7

01/22/06 JGJ 4.0

01/23/06 JGJ 4.25

SHF 10.0

01/24/06 JGJ 5.25

SHF 3.7

01/25/06 JGJ 7.0

SHF 3.8

01/26/06 JGJ 3.0

SHF 3.0

01/27/06 JGJ 2.5

SHF 2.5

01/29/06 JGJ 3.25

SHF 2.0

01/30/06 JGJ 2.0

SHF 2.0

01/31/06 JGJ 3.25

SHF 3.2

JGJ 116.25 @

SHF 155.00 @

TOTAL:

EXPENSE STATEMENT

Copies and postage expenses (itemization attached)

BALANCE DUE:

*OK
to pay
T/M*

JONES, FUNDERBURG, SESSUMS & PETERSON, PLLC

Attorneys at Law
901 North State Street · Jackson, Mississippi 39202
Telephone (601) 355-5200 · Telecopier (601) 355-5400
johnjones@jfsplawfirm.com

John Griffin Jones
Steven H. Funderburg
Craig R. Sessums
G. Davis Peterson

Mailing Address:
Post Office Box 13960
Jackson, Mississippi 39236-3960

March 3, 2006

Rex Deloach
Scruggs Legal, P.A.
Post Office Box 1136
Oxford, Mississippi 38655

VIA FAX (662-234-7615) AND U.S. MAIL

RE: William Roberts Wilson, Jr. and William Roberts Wilson, Jr., P.A.
and Alwyn H. Luckey v. Richard F. Scruggs, Richard F. Scruggs, P.A.,
Scruggs, Millette, Bozeman, & Dent, P.A. and Asbestos Group, P.A.
Civil Action Nos.: 1:05cv89JAD and 251-94-582-CIV

Dear Friends:

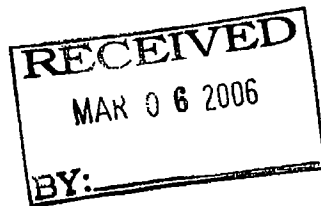
Enclosed is our bill for services 02/01/06 to 02/28/06. Please place in line for payment.

Thank you very much.

Sincerely yours,

JONES, FUNDERBURG,
SESSUMS & PETERSON, PLLC


John Griffin Jones



JGJ/bk

Enclosures

Cc: Richard F. Scruggs, Esquire
Jack F. Dunbar, Esquire

**WILLIAM ROBERTS WILSON, JR. AND
WILLIAM ROBERTS WILSON, JR., P.A.**

PLAINTIFFS

AND

ALWYN H. LUCKEY

INTERVENOR

VS.

**CIVIL ACTION NOS.: 1:05CV89JAD
251-94-582-CIV**

**RICHARD F. SCRUGGS, RICHARD F.
SCRUGGS, P.A., SCRUGGS, MILLETTE,
BOZEMAN, & DENT, P.A. AND ASBESTOS
GROUP, P.A.**

DEFENDANTS

BILL FOR LEGAL SERVICES 02/01/06 TO 02/28/06

02/01/06 JGJ 4.25

SHF 6.1

02/02/06 JGJ 4.75

SHF 4.6

02/03/06 JGJ 1.5

02/04/06 SHF 1.0

02/06/06 JGJ 5.0

SHF 7.6

02/08/06 JGJ 1.5

SHF 8.0

02/09/06 SHF 2.6

02/10/06 JGJ 2.75

SHF 4.0

02/13/06 SHF 9.0

02/14/06 JGJ 6.75

SHF 9.0

02/15/06 JGJ 5.0

SHF 9.0

02/17/06 SHF 3.0

02/20/06 JGJ 6.0

SHF 4.8

02/23/06 SHF 4.0

02/24/06 SHF .5

02/28/06 JGJ 3.25

SHF 6.75

JGJ 40.75 @

SHF 79.95 @

TOTAL:

EXPENSE STATEMENT

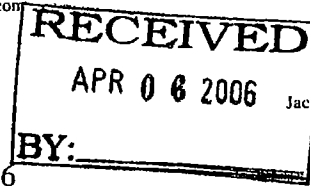
Copies and postage expenses (itemization attached)

BALANCE DUE:

JONES, FUNDERBURG, SESSUMS & PETERSON, PLLC

Attorneys at Law
901 North State Street - Jackson, Mississippi 39202
Telephone (601) 355-5200 · Telecopier (601) 355-5400
johnjones@jfsplawfirm.com

John Griffin Jones
Steven H. Funderburg
Craig R. Sessums
G. Davis Peterson



Mailing Address:
Post Office Box 13960
Jackson, Mississippi 39236-3960

April 4, 2006

Rex Deloach
Scruggs Legal, P.A.
Post Office Box 1136
Oxford, Mississippi 38655

VIA FAX (662-234-7615) AND U.S. MAIL

RE: William Roberts Wilson, Jr. and William Roberts Wilson, Jr., P.A.
and Alwyn H. Luckey v. Richard F. Scruggs, Richard F. Scruggs, P.A.,
Scruggs, Millette, Bozeman, & Dent, P.A. and Asbestos Group, P.A.
Civil Action Nos.: 1:05cv89JAD and 251-94-582-CIV

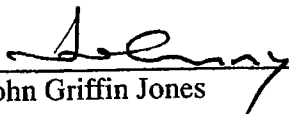
Dear Friends:

Enclosed is our bill for services 03/01/06 to 03/31/06. Please place in line for payment.

Thank you very much.

Sincerely yours,

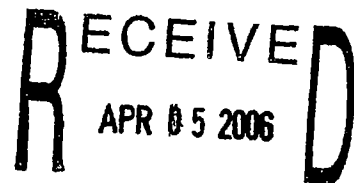
JONES, FUNDERBURG,
SESSUMS & PETERSON, PLLC


John Griffin Jones

JGJ/lh

Enclosures

cc: Richard F. Scruggs, Esquire
Jack F. Dunbar, Esquire



**WILLIAM ROBERTS WILSON, JR. AND
WILLIAM ROBERTS WILSON, JR., P.A.**

PLAINTIFFS

AND

ALWYN H. LUCKEY

INTERVENOR

VS.

**CIVIL ACTION NOS.: 1:05CV89JAD
251-94-582-CIV**

**RICHARD F. SCRUGGS, RICHARD F.
SCRUGGS, P.A., SCRUGGS, MILLETTE,
BOZEMAN, & DENT, P.A. AND ASBESTOS
GROUP, P.A.**

DEFENDANTS

BILL FOR LEGAL SERVICES 03/01/06 TO 03/31/06

03/01/06 SHF .2

03/03/06 SHF .1

JGJ 3.25

03/07/06 SHF .7

JGJ 1.5

03/10/06 SHF 2.2

JGJ 1.25

03/13/06 SHF .9

03/14/06 JGJ 3.5

03/15/06 JGJ 3.0

03/20/06 SHF 1.5

JGJ 2.5

03/23/06 SHF .2

JGJ 15.00 @

SHF 5.8 @

TOTAL:

BALANCE DUE:

OK
TM
28562

