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REPUBLIC OF MARSHALL ISLANDS

IN THE HIGH COURT REPUBLIC OF THE MARSHALL ISLANDS

)	Civil Case No. 2014-067
Eigigu Holdings Corporation,)	
Plaintiff v.)	
)	Affidavit of Leander Leander.
)	in Support of His Motion for
)	Relief from Entry of Default.
)	
)	
Leander Leander and Lijun Leander,)	
)	
Defendants)	
)	

I, Leander Leander, declare:

- I am over 21 years of age and resident of Majuro Atoll, and citizen of the Republic of the Marshall Islands.
- 2. I have personal first hand knowledge of the following facts, and if called as a witness could and would testify thereto in a Court of Law.
- 3. In July of this year I was served with papers from Court, which I later learned were a Summons and Complaint in the above entitled matter.
- 4. Within 1 week of receiving the Summon and Complaint, I met with attorney Russel Kun. Mr. Kun had told me on many occasions about the various cases he had won, I and believed he was a good attorney. Mr. Kun agreed to represent me, and became my lawyer in this suit.

- 5. Once I had retained Mr. Kun, I believed he would take all actions necessary to represent me, and protect my interests.
- 6. Within the past two weeks, I began to have doubts about Mr. Kun's ability to represent me. He also told me that he has a conflict because of his family in Nauru.
- 7. I became concerned, and attempted to meet with John Masek to discuss my case. Mr. Masek was not available till November 6, 2014. I met with Mr. Masek on the evening of November 6, 2014. He informed me that no Answer had been filed and Plaintiff was seeking to have a default entered against me. I was shocked and angry to hear this, as I relied upon Mr. Russel Kun to protect my interests, and file any needed Answer.
- Attached as Exhibit "A" is a true and copy of the lease agreement signed and registered 8. on July 9, 2010. Attached are 5 exhibits describing the property of have under my sublease. I have never violated any of the terms or conditions of this lease, and I believe that this sub-lease is still in full force and effect.
- 9. Attached hereto as Exhibit "B" is a receipt for the funds paid for my sub-leases. No rent is due at this time, and all rent has been fully paid.

I declare under penalty of perjury that the forgoing is true and correct. Executed this 10th day of November, 2014, at Majuro, Marshall Islands.

Leander Leander

Republic Of The Marshall Islands