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IN THE HIGH COURT REPUBLIC OF THE MARSHALL ISLANDS

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Eigigu Holdings Corporation, Plaintiff v. Leander Leander and Lijun Leander, Defendants Civil Case No. 2014-067

Affidavit of John E. Masek in Support of Defendants Motion for Relief from Entry of Default.

I, John E. Masek, declare:

- I am over 21 years of age and resident of Majuro Atoll, and citizen of the United States of America.
- I am the attorney of record for Defendants, and I have personal first hand knowledge of the following facts, and if call as a witness could and would testify thereto in a Court of Law.
- 3. On or about July 13, 2012, Mr. Rubin Tsitsi was terminated as the representative of Plaintiff, Eigigu Holdings and the Nauru Government Council. Attached as Defendant's Exhibit "C" is a true and correct copy of said termination letter, originally filed by Eigigu Holdings in the matter of Eigigu Holdings v Rubin Tsitsi, High Court case #2013-005.

- Attached as Defendant's Exhibit "D" is a true and correct copy of 2013 Amendment to 4. the 1990 Lease Agreement for the Eastern Gateway Hotel, originally filed Eigigu Holdings in the matter of Eigigu Holdings v Rubin Tsitsi, High Court case #2013-005.
- 5. On November 10, 2014, I went to the Registrar of Foreign Investment. Staff at the Registrar confirmed that Eigigu Holdings Foreign Investment Business License, License #RMI-2014-04, was issued on October 3, 2014. Staff further confirmed that there was no previous license for Eigigu Holdings.

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

ohn E. Masek