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ASST. CLERK OF COURTS
REPUBLIC OF MARSHALL ISLANDS

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Attorney for Plaintiff

**IN THE HIGH COURT
OF THE
REPUBLIC OF THE MARSHALL ISLANDS**

Eigigu Holdings Corporation

Plaintiff,

v.

**Leander Leander and Lijun
Leander**

Defendants.

Civil Action No.: 2014-067

AFFIDAVIT OF COUNSEL

1. I, Gordon C. Benjamin, am an adult resident of Majuro, Marshall Islands, and counsel to the Plaintiff in this matter, and in the matters identified as Civil Action 2012-202, and Civil Action 2013-005, in the “Motion to Disqualify John Masek as Counsel to Defendants,” and in “Plaintiff’s Initial Memorandum of Points and Authorities in support of Motion to Disqualify John Masek as Counsel to Defendants” filed herewith;
2. I do hereby swear that the statements made in the “Motion to Disqualify John Masek as Counsel to Defendants,” and in “Plaintiff’s Initial Memorandum of Points and Authorities in support of Motion to Disqualify John Masek as Counsel to Defendants” filed herewith are made in good faith and are true to the best of my knowledge and understanding.

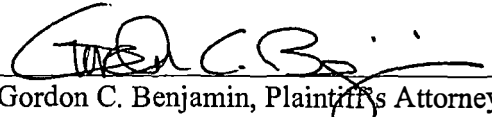
Respectfully submitted,

Date: November 11, 2014

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ASST. CLERK OF COURTS
REPUBLIC OF MARSHALL ISLANDS


Gordon C. Benjamin, Plaintiff's Attorney

2nd August 2012

To: Mr. David Aingimea
Executive Chairman
Eigigu Holdings Corporation
Republic of Nauru

PLAINTIFF'S
EXHIBIT A

From: Rubin Tsitsi
Majuro Atoll, MH 96960

Re: Claims of Unpaid Wages and Entitlements. etc

My good Chairman,

I am in receipt of your letter dated 17th July 2012 re: vacating Eastern Gateway property.

Firstly, I regret that I was unable to meet with you and Minister(s) Marcus Stephen and Riddel Akua during your last trip to Majuro but was bedridden due to swelling of leg.

I have accepted Mr. Mike Aroi's official letter dated 13th July 2012 ending my tenure as representative of Nauru gov't and EHC IN Majuro.

I'd like to work out a reasonable time frame for me to vacate the premises and at the same time, wish to make certain claims of unpaid wages and entitlements etc. since my appointment and placement dated 28th June 1993.

Secondly, I have reviewed Strauss' claim that annual rent for Eastern Gateway property was not paid since 15th July 2004, to 15th July 2011 pursuant to section 3(b) of the lease and I believe he had furnished you copy of default notice during your earlier visit with board member Dexter Bretcherfeld. I am prepared to work with you and provide whatever assistance or input during this interim period with copies of payments made from 15th July 2004 onwards to counter Strauss' ridiculous claims.

I look forward to your favourable response in due course.

Sincerely,

Rubin Tsitsi