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REPUBLIC OF MARSHALL ISLANDS

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  <b>AFFIDAVIT OF EIGIGU HOLDINGS CORPORATION DIRECTOR VYKO ADEANG</b>
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I, Vyko Adeang, do solemnly declare and affirm under the penalties of perjury that the matters and facts set forth below are true to the best of my knowledge, information, and belief:

Regarding the matter of the Eastern Gateway Hotel in the instant matter:

1. I am an adult citizen of the Republic of Nauru.
2. I am a Director in the Board of Directors of the Eigigu Holdings Corporation ("EHC") who have leased land currently occupying the Eastern Gateway Hotel ("EGH") in Delap, Majuro, Marshall Islands.
3. I had attempted to retrieve receipts of payments that Mr. Rubin Tsitsi ("Tsitsi") had allegedly made to the traditional landowner lessors for a land lease where the EGH is located.
4. At first Tsitsi informed me and other representatives of EHC that he did not have any receipts of payments.
5. After EHC terminated the services of Tsitsi around in the first half of 2012, Tsitsi represented that he did have some receipts, and when I and other representatives asked for those receipts, he said that he already had turned them over to EHC, but we never received those receipts.
6. So, later in 2012, the Chairman of EHC, Mr. David Aingimea, and other EHC representatives accompanied Tsitsi to the Bank of Guam where Tsitsi stated he kept EHC

bank accounts.

7. At the Bank of Guam the Chairman was informed that the accounts had been inactive and closed for quite some time, and there was no EHC monies in the Bank of Guam.
8. I, and Chairman Aingimea requested Tsitsi to give us access to the EHC documents and records that he kept but he always refused us access, even though he was terminated and we had requested him to leave the premises.
9. Even after EHC terminated Tsitsi, he remained on the EGH premises harassing the tenants about payments and supplies and materials. When I approached tenants at the EGH premises about negotiating new leases or even getting copies of their leases and receipts, they told me that they were scared of Tsitsi who had informed them that he, Tsitsi was still the boss and they could not talk to me or any representatives of EHC.
10. When we were finally able to remove Tsitsi from the EGH premises, and we inspected his residence, we found no records of any kind.
11. We do not know what happened to those records, but he had first said he had them and then he refused to give them to us.
12. We have looked for sub-leases that the Leanders have made with their tenants but have been unable to find any.
13. Because Tsitsi did not give us any sub-subleases we then went to the Land Registration Authority.
14. At the Land Registration Authority we were able to find only two minor sub-subleases, the majority of the sub-subleases we were not able to locate.
15. Further this Affiant sayeth not.

Dated: December 16, 2014



\_\_\_\_\_  
Vyko Adeang  
Director, Efigu Holdings Corporation

SUBSCRIBED AND SWORN TO BEFORE  
ME THIS 16th DAY OF Dec 2014

.....  
Asst. Clerk of Courts  
Republic Of The Marshall Islands

Notary Public

Affidavit of EHC Director Vyko Adeang (CA 2014-05)



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REPUBLIC OF MARSHALL ISLANDS

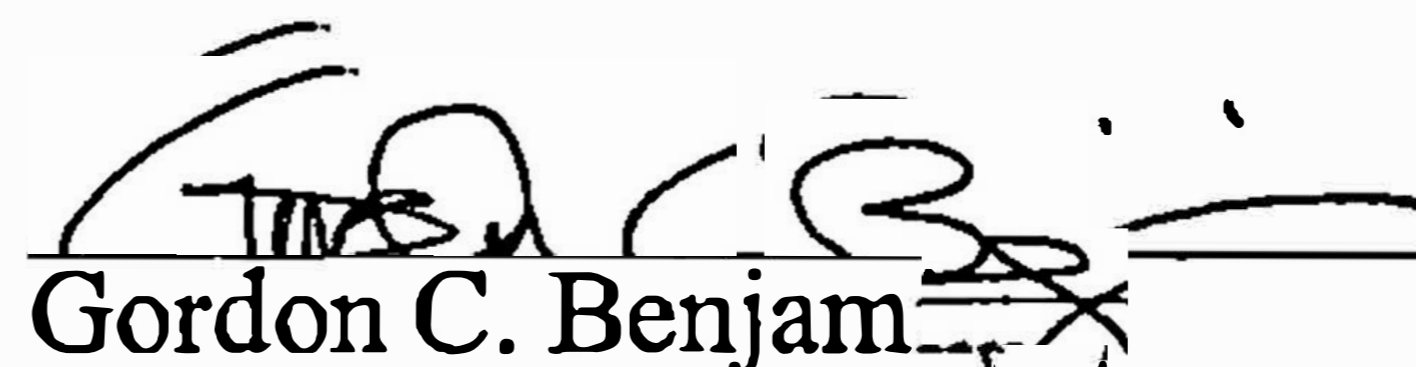
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Attorney for Plaintiff

IN THE HIGH COURT  
OF THE  
REPUBLIC OF THE MARSHALL ISLANDS

<p>EIGIGU HOLDINGS CORPORATION,  Plaintiff  -v-  LEANDER LEANDER and LIJUN LEANDER,  Defendants</p>	<p>Civil Action No. 2014-067</p> <p><b>CERTIFICATE OF SERVICE of RESPONSE TO DEFENDANTS LEANDERS' OPPOSITION TO PLAINTIFF'S MOTION TO DISQUALIFY MASEK</b></p>
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I, Gordon C. Benjamin, do hereby certify, that I emailed a copy of "Response to Defendants Leanders' Opposition to Plaintiff's Motion to Disqualify Masek" including Affidavit by Eigigu Holdings Corporation Director Vyko Adeang to defendants' attorney John E. Masek by email at email address jamesq@hotmail.com on December 16, 2014.

Dated: December 16, 2014

  
Gordon C. Benjamin  
Counsel to Plaintiff