FILED

IN THE HIGH COURT OF THE REPUBLIC OF THE MARSHALL ISLANDS

EIGIGU HOLDINGS CORPORATION,

Civil Action No. 2014-067

Plaintiff

-v-

PARTIES PROPOSED PRE-TRIAL **SCHEDULING**

LEANDER LEANDER and LIJUN LEANDER,

Defendants

COME NOW, the Plaintiff and the Defendants in this matter, through their respective counsel, and file the following proposed pre-trial scheduling:

Discovery deadlines:

- May 15, 2015: Initial Disclosure completed;
- May 29, 2015: Disclosure of Expert Testimony, to allow time for depositions of experts;
- July 24, 2015: completion of discovery
- · August 28, 2015 (unless deposition transcripts have not been completed by the responsible clerks of the Court): filing dispositive trial motions.
- Week of September 21-25, 2015: Counsel request that a scheduling conference be held during this week, or at such time as the Court sees fit, to consider a hearing date for any pending dispositive motions and to address other issues that may have arisen.

Dated: March 25, 2015

James McCaffrey

Counsel to Defendants