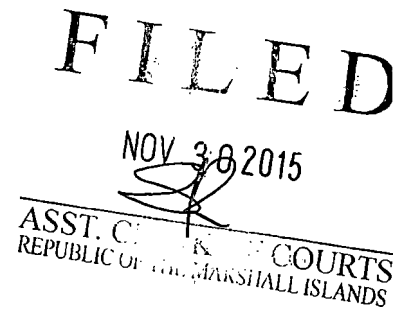


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Attorney for Plaintiff



**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

PLAINTIFF'S INITIAL DISCLOSURES

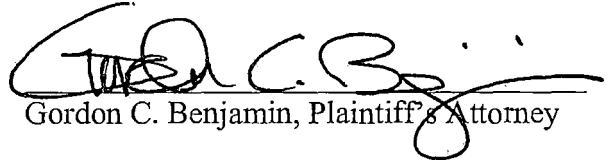
COMES NOW the Plaintiff by and through counsel Gordon C. Benjamin and provides these initial disclosures pursuant to the Court's November 13, 2015 Order, and MIRCPC Rule 26(a), as follows:

1. Rule 26(a)(1)(A)(i) "the name, and if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment":

- a. David Aingimea, Chairman, Eigigu Holdings Corporation, Suite 166, Menen Hotel, Republic of Nauru. Ph: (674) 557-8000 in Nauru;
- b. Vyko Adeang, Director of Eigigu Board, Suite 166, Menen Hotel, Republic of Nauru. Ph: (674) 557-8000 in Nauru.

2. For Rule 26(a)(3)(A)(i)—potential witnesses: same 2 persons listed above.

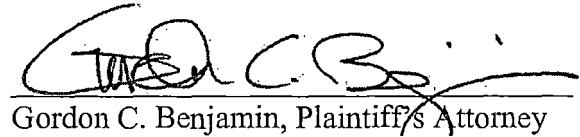
Date: November 30, 2015.



Gordon C. Benjamin, Plaintiff's Attorney

Certificate of Service

I, Gordon C. Benjamin, counsel to Plaintiff, do hereby certify that I emailed a copy of the above to Defendants' counsel, Mr. James McCaffrey, at his email address "James@mccaffreyfirm.com" on November 30, 2015, Majuro date.



Gordon C. Benjamin, Plaintiff's Attorney