

DIVINE F. WAITI
Counsel for Plaintiff
Box 3897
Majuro, MH 96960
Phone: 455-3575
email: marsollawyers@gmail.com

FILED

MAY 11 2018

ASST. CLERK OF COURTS
REPUBLIC OF THE MARSHALL ISLANDS

IN THE HIGH COURT
REPUBLIC OF THE MARSHALL ISLANDS
MAJURO ATOLL

EIGIGU HOLDINGS CORPORATION)	Civil Action no. 2014 – 067
)	
Plaintiff)	
)	
-V-)	
)	
LEANDER LEANDER and LIJUN LEANDER,)	MOTION TO ENLARGE TIME
CHEN WAN BEN, AA COMPANY, HUI CUI)	FOR DISCOVERY AND PRE-
)	TRIAL MOTIONS;
)	DECLARATION OF COUNSEL

Comes now, Plaintiff herein, by and through counsel, Divine F. Wait and moves that the court enlarges the closing date for discovery and pre-trial motions.

This motion is based on the court's record and declaration of counsel below.

Dated: May 11, 2018



Divine F. Waiti

IN THE HIGH COURT
REPUBLIC OF THE MARSHALL ISLANDS
MAJURO ATOLL

EIGIGU HOLDINGS CORPORATION)	Civil Action no. 2014 – 067
)	
Plaintiff)	
)	
-V-)	
)	
LEANDER LEANDER and LIJUN LEANDER,)	DECLARATION OF COUNSEL
CHEN WAN BEN, AA COMPANY, HUI CUI)	
_____)	

I, Divine F. Waiti, declare under the penalty of perjury law that the foregoing is true and correct to the best of my knowledge and belief:

1. I am the counsel of record in this matter, and competent to declare matters contained herein;
2. In it's January 22, 2018 Order, the Court ordered potential deposition of the Defendant Leander Leander in Hawaii and that the Defendant to pay \$750 for partial travel cost for the Plaintiff counsel;
3. That I have sent requests and still waiting for the client to confirm whether to travel for deposition and disburse necessary funds to support the deposition in Hawaii;
4. I will be going off-island from May 27, 2018 to June 1, 2018 for another engagement and may be unable to file pre-trial motions on May 29th, the week that I will be away from the Marshall Islands;
5. I therefore seek that the Court enlarges time for closing of discovery date and time for pre-trial motions for another two weeks.

Dated: May 11, 2018



Divine F. Waiti

CERTIFICATE OF SERVICE

I certify that a copy of this motion will be served on the Defendant's Attorney, James McCaffrey, via his email. James@mccaffreyfirm.com

Dated: May 11, 2018



Divine F. Waiti