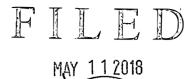
DIVINE F. WAITI Counsel for Plaintiff Box 3897 Majuro, MH 96960

Phone: 455-3575

email: marsollawyers@gmail.com



ASST. C. AS OF COURTS
REPUBLIC COME MARSHALL ISLANDS

IN THE HIGH COURT REPUBLIC OF THE MARSHALL ISLANDS MAJURO ATOLL

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

- 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;
 - 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