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Attorney for Defendant

FILED

JUN 14 2018

  
CLERK OF COURTS  
REPUBLIC OF THE MARSHALL ISLANDS

IN THE HIGH COURT  
REPUBLIC OF THE MARSHALL ISLANDS

EIGIGU HOLDING CORPORATION

Plaintiff,

vs.

LEANDER LEANDER and LIJUN LEANDER

Defendants

Civil Action No. **2014-067CRW**

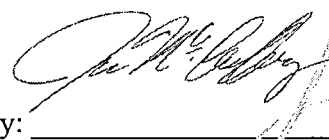
DEFANDANT'S MOTION TO ENLARGE  
TIME FOR PRE-TRIAL MOTIONS;  
DECLARATION OF JAMES  
McCAFFREY; [Proposed] ORDER; and  
CERTIFICATE OF SERVICE

Comes now Defendants, by and through their attorney James McCaffrey, and hereby file this Motion to Enlarge Time for Pre-Trial Motions on the following grounds:

1) Counsel for Defendants has been substantially impeded in his work for the past week due to an attack of gout per his attached Declaration and will be unable to complete a planned motion when due by end of the day; and

2) Counsel believes such motion in limine is important and as it will help focus the legal issues for trial in this matter.

Dated: 14 June 2018  
Majuro Atoll

By:   
James McCaffrey  
Attorney for Defendants

Digitally signed by James McCaffrey  
DN: cn=James McCaffrey, o=The McCaffrey Firm Ltd, ou, email=James@McCaffreyFirm.com, c=US  
Date: 2018.06.14 11:33:30 +12'00'

IN THE HIGH COURT  
REPUBLIC OF THE MARSHALL ISLANDS

EIGIGU HOLDING CORPORATION

Plaintiff,

vs.

LEANDER LEANDER and LIJUN LEANDER

Defendants

Civil Action No. 2014-067 CRW

DECLARATION OF JAMES McCAFFREY

I, James McCaffrey, do hereby declare and state under the penalty of perjury:

1. I am the attorney for the Defendants in this action.

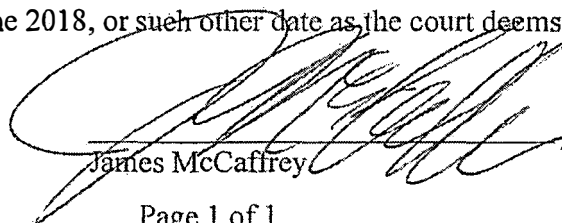
2. The facts in this Declaration are of my personal knowledge and I am competent to testify and can testify to the contents of this Declaration at trial.

3. I returned to Majuro last week on Monday, 4 June 2018. Later in the week, my left 'index' toe became to swell, followed by my big toe, and then my entire left foot. By Sunday, I could not stand on the foot. Monday morning, I saw Dr. Pinano who diagnosed this as gout and prescribed medicine for such.

4. The relevance to this motion is that besides from the pain and discomfort the gout has been enervating and drained me of energy. I have only been able to do an hour or two of legal work in past three days and only a few more in the days immediately prior. I had intended to file an extensive pre-trial motion in limine regarding the applicable law for this case, which would help focus this case, but I will be unable to do so by the end of today when it due per the court's order of 16 May 2018.

5. Thus, on behalf of my clients I request an enlargement of time to file a pretrial motion until the close of business, Monday, 25 June 2018, or such other date as the court deems reasonable.

Dated: 14 June 2018  
Majuro Atoll



James McCaffrey

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DECLARATION OF JAMES McCAFFREY

Civil Action No. 2014-067, EIGIGU HOLDINGS CORP v. LEANDER

METHOD OF FILING

The foregoing

DEFENDANTS' MOTION TO ENLARGE TIME FOR DISCOVERY AND PRE-TRIAL  
MOTIONS; DECLARATION OF JAMES McCAFFREY; [Proposed] ORDER

was filed with the High Court in Majuro on the date below-written.

CERTIFICATE OF SERVICE

I hereby certify that an exact duplicate of the document(s) filed above was duly served upon  
the below-named person(s) on the date below written by sending them a copy

( X ) by Email to the email address opposite their name:

Divine F. Waiti  
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Marsol Lawyers & Consultants  
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Counsel for Plaintiff EIGIGU HOLDINGS CORP.

[djwaiti@gmail.com](mailto:djwaiti@gmail.com)

Dated: 14 June 2018  
Majuro Atoll

*/s/ James McCaffrey*  
JAMES McCAFFREY  
Attorney for Defendants LEANDER