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OCT 09 2018

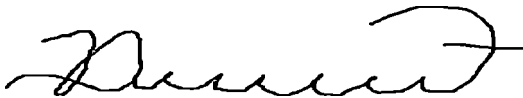

ASST. CLERK OF COURTS
REPUBLIC OF THE MARSHALL ISLANDS

IN THE HIGH COURT
REPUBLIC OF THE MARSHALL ISLANDS
MAJURO ATOLL

EIGIGU HOLDINGS CORPORATION)	Civil Action no. 2014 – 067
)	
Plaintiff)	
)	
-V-)	AMENDED
)	PLAINTIFF'S LIST OF WITNESSES
)	AND DOCUMENTS FOR TRIAL
LEANDER LEANDER and LIJUN LEANDER,)	
_____)	

Comes now, Plaintiff herein, by and through counsel, Divine F. Wait pursuant to June 29, 2018, Court Order hereby submit the Plaintiff's ^{AMENDED} list of witnesses and documents to be used during the trial on October 10 and 11.

Dated: September 3, 2018



Divine F. Waiti

1. PLAINTIFF'S LIST OF WITNESSES:

The Plaintiff intends to call the following individual as witnesses and who likely to have discoverable information that may support Plaintiff's claims. Plaintiff reserves the right to amend or supplement the list of witnesses. The following witnesses may not include persons whose testimony is likely to be used solely for impeachment, rebuttal, or expert witness testimony, who will be disclose information during the trial.

<p>A. Ludwig Scotty Address: Anabar District, Nauru Contact: +674 5577937</p>	<p>The Chairman of Eigigu Holding Corporation. Will testify on the appointment of Mr. Rubin Tsitsi and how the Eastern Gateway was managed in the past years.</p>
<p>B. Nasio Jeremiah Address: Aiwo District, Nauru Contact: +674 5577965</p>	<p>The CEO of Eigigu Holding Corporation who will testify on the operation of the Plaintiff's company in Nauru and in the Marshall Islands. Testify on the signature of Rubin Tsitsi.</p>
<p>C. Vyko Adeang Address: Aiwo District Nauru. Contact: pentaxadeang@gmail.com</p>	<p>The former Director of the Board of Directors of Eigigu Holding Corporations. Knowledgeable about the dealings of Robin Tsitsi, and the Defendants dealings and unlawful uses of the Eastern Gateway for unlawful purposes.</p>

<p>D. Former Sex Worker</p> <p>Address: Identity withheld</p>	<p>A former Sexworker at the Island Disco.</p> <p>Testify about the prostitution at the Eastern Gateways.</p>
<p>E. Yolanda Lodge-Ned</p> <p>Address: Wotje Weto, Delap</p> <p>Contact: 456 6557</p>	<p>Senior Dri jermal on Wotje Weto, Delap – testified on landowner’s initiative to terminate the original lease. Landowners support for hotel premises than for other forms of sublets.</p>
<p>F. Emlin Joran</p> <p>Address: Remejeon Weto, Delap</p>	<p>Alab on Remejeon Weto, Delap. Will testify on landowners initiative to terminate the original lease. The landowners support for operation of a hotel premises other than for illegal activities.</p>
<p>G. Iroj Patrik Lein</p> <p>Address: Wotja Village, Majuro</p>	<p>Irojlaplap for both Wotje and Remejeon weto. Will testify on the termination of the original lease with the Plaintiff.</p>
<p>James Keppa</p>	<p>Investigate the prostitution on Eastern Gateway</p>
<p>Jamaica Adeang</p>	<p>Investigate the prostitution on the on Eastern Gateway.</p>

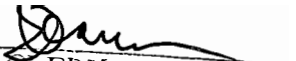
David Strauss

Gave notice for termination of lease on behalf
of the landowners

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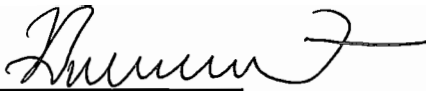
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CERTIFICATE OF SERVICE


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REPUBLIC OF THE MARSHALL ISLANDS

I certify that a copy of this document will be served on the counsel for Defendants through his email, James McCaffrey. James@mccaffreyfirm.com, this date or soon thereafter file stamp of the document.

Dated: October 9, 2018



Divine F. Waiti