

FILED

DATE: 1/17/13 TIME: 9:20 am/pm

By: [Signature]  
CLERK, FSM SUPREME COURT  
CHUUK  
TRIAL DIVISION

IN THE  
SUPREME COURT OF THE  
FEDERATED STATES OF MICRONESIA  
TRIAL DIVISION-CHUUK STATE

FEDERATED STATES OF	)	CRIMINAL CASE NO.2011-1506
MICRONESIA,	)	
	)	
Plaintiff,	)	
	)	SUPPLEMENT TO DEFENDANT'S
v.	)	MOTION TO TRAVEL AND TO ALLOW
	)	TO APPLY FOR FSM PASSPORT
KANSON THOMAS,	)	
	)	
Defendant.	)	
_____	)	

COMES NOW, defendant, Kanson Thomas. in the above entitled and numbered cause, by and through his undersigned counsel, hereby supplements the attached letter from the defendant's wife's doctor. Siana Shapucy, from the Chuuk State Hospital. Defense counsel has also just obtained information from the defendant that he has located his FSM passport that he believed was lost or damaged. This is supported with the following memorandum of points and authorities.

MEMORANDUM OF POINTS AND AUTHORITIES

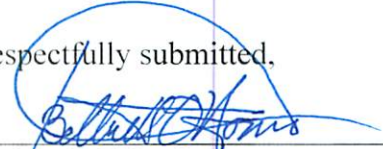
This supplement is submitted pursuant to Rule 16 (b) of the Rules of the Criminal Procedure. The defendant respectfully asks the Court to accept the supplementary documents to verify and confirm the purpose of his travel to Guam. Copy of doctor's letter is attached herein as Exhibit A.

The defendant request that the Court grant his request for the purpose of seeking professional and adequate medical service to accommodate his wife who needs a cesarean operation outside of Chuuk.

**CONCLUSION**

WHEREFORE, defendant respectfully pray that the Court grants defendant's motion to allow the defendant to travel to Guam for his wife's medical treatment.

Respectfully submitted,



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Bethwell O'Sonis  
FSM Public Defender  
P.O. Box 754  
Chuuk, FM 96942  
Tel: 330-5995

**CERTIFICATE OF SERVICE**

This is to certify that, on this 17<sup>th</sup> day of January, 2013, the undersigned, caused to serve a true and correct copy of the foregoing motion, upon the plaintiff's counsel in the manner indicated below.

Hand delivery:

Jayson Robert  
Attorney General Office-Chuuk State, Nantaku, Weno  
P.O. Box 1050  
Chuuk, FM 96942  
Tel: 330-2572



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# CHUUK STATE GOVERNMENT

## DEPARTMENT OF HEALTH SERVICES

State of Chuuk

Federated States of Micronesia 96942

P.O Box 400

Phone. (691) 330-2216/2217

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Mr. Julio Marar - Director  
Mr. Resty Sotaro - Deputy Director  
Karita Mārcus - Hospital Administrator

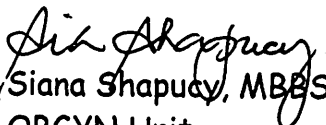
January 16, 2013

To Whom It May Concern:

I have been attending to Mrs. Naomi Fritz Thomas during her present pregnancy, and I strongly advised her to go abroad for further medical care and management because of her bad obstetric history. She had surgical operation (caesarian section) for all her three previous deliveries. The risk of uterine rupture is very high, and therefore she is better off to go abroad for further care and management. Because of this great risk, it is inevitable that her husband goes along with her.

I thank you very much for your understanding, and for allowing Mr. Calson Thomas to accompany his wife who will be travelling abroad for further medical care and management.

Respectfully yours,

  
Siana Shapucy, MBBS

OBGYN Unit

Chuuk State Hospital

Weno, Chuuk FSM 96942