



time, the court for cause shown may at any time in its discretion (1) with or without motion or notice order the period lengthened if such a request is made before the expiration of the period originally prescribed or as extended by a previous order or (2) upon motion made after the expiration of the specified period permit the act to be done where the failure to act was the result of excusable reason; but it may not extend the time for taking any action under rules 25; 52(b), 59(b), (d) and (e), and 60(b), except to the extent and under the conditions stated in them." *Underlining and emphasis added.*

As provided by the above rules, enlargement may be made before the expiration of the period specified.

In the case at bar, the Honorable Court upon request of the parties granted the filing of pretrial motions until May 16, 2013.

Due to the current inception of the new administration and impending reorganization of the office, the relocation of the Attorney General's Office defendant Chuuk State needs additional time until today June 15, 2013 to file its pretrial motions.

## **II. CERTIFICATION [Rule b (d)]**


Pursuant to Rule 6(d) of the FSM Supreme Court Rules of Civil Procedure, plaintiff agreed to this motion. Co-defendant CPUC has been contacted via email and no response as of this pleading.

## **III. RELIEF**

WHEREFORE, it is respectfully prayed that an Order be issued by the Honorable Court granting this motion. Other just and equitable reliefs are likewise prayed for.

Respectfully submitted on this 16<sup>th</sup> day of May 2013

OFFICE OF THE ATTORNEY GENERAL  
CHUUK STATE GOVERNMENT  
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Counsel for defendants

  
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Sabino Asor


Consultant for the Attorney General's Office

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was cause to be served to Plaintiff's counsel's address below on this 16<sup>th</sup> day of May 2013:


**DERENSIO KONMAN**  
Counsel for Plaintiff  
c/o MLSC - CHUUK  
P. O. Box D  
Weno Island, Chuuk FM 96942

By personal delivery

  
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**KEMBO MIDA JR.**  
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Counsel for CPUC  
P. O. Box 1480  
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Mailed by: \_\_\_\_\_

  
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