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POHNPEI
TRIAL DIVISION

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SUPREME COURT
FEDERATED STATES OF MICRONESIA
TRIAL DIVISION - STATE OF POHNPEI

FSM Development Bank,)
)
 Plaintiff,)
)
 v.)
)
Linda Carl and the Estate of)
Yoshiro Carl,)
)
)
 Defendants.)
)

CIVIL ACTION NO. 1996-060

PLAINTIFF'S REQUEST FOR
PRODUCTION OF DOCUMENTS
TO LINDA CARL

FSM Civil Rules 34 and 69

TO: Linda Carl, Individual, c/o Attorney Yoslyn Sigrah.

FSM Development Bank ("FSMDB") submits this request for production of documents to Defendant Linda Carl, Individual, pursuant to FSM Civ. Rules 69 and 34. Answers must be filed and served within thirty (30) days of receipt of this document.

With respect to document production, unless otherwise indicated in your response, it will be assumed that the documents produced are the result of a thorough search of your records as well as those of your agents, accountants, attorneys and other consultants and advisors. It will likewise be assumed that no other responsive documents or materials exist in your care or custody or that of your agents unless your response is

otherwise qualified. You are directed to the FSM Rules of Civil Procedure, particularly Rule 34, to guide you in your response to this Request For Production of Documents. Generally, you have thirty (30) days from service of this document upon you to provide your written responses to FSMDB's counsel. You are also requested to produce responsive documents as requested herein for inspection and copying at FSMDB's Corporate Office, Pohnpei within thirty (30) days from service of this document upon you.

Definitions

"Document" means any written, printed, typed or other graphic matter of any kind or nature, including drafts and copies which contain marks or notations not found on the original, and including but not limited to all reports, recommendations, envelopes, memoranda, telegrams, emails, messages, studies, analysis, tests, comparisons, books, articles, magazines, booklets, bulletins, notices, instructions, minutes, purchase orders, surveys, charts, graphs, photographs, phonographs, tapes and other recordings, magnetic tapes, discs, drums, printouts, digital and/or computer files and other data compilations from which information can be obtained.

Request for Production of Documents

Request for Production No. 1: All bank account statements and reports including copies of checks from banks, financial institutions, brokerages, or custodians, in the FSM and anywhere

in the world, reflecting assets in Linda Carl's name, individually or jointly with others, or under her direct or indirect control, including but not limited to accounts for all other businesses owned and/or operated by Linda Carl covering January 1, 2014 through December 31, 2014.

Request for Production No. 2: The 2013 year end, and the 2014 quarters ending March 31, 2014, June 30, 2014 and September 30, 2014 gross revenue tax returns and wage tax records for all income to Linda Carl, any business owned and/or operated by Linda Carl and/or any business from which Linda Carl received, receives or is entitled to income.

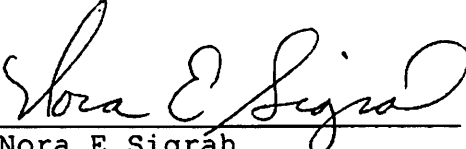
Request for Production No. 3: The 2013 year end, and the 2014 quarters ending March 31, 2014, June 30, 2014 and September 30, 2014 FSM Social Security returns for Linda Carl, and for any business for which Linda Carl is listed as an employee.

Request for Production No. 4: Any record, compilation or summary of income or compensation that Linda Carl has received from any source in 2014, including but not limited to interest, lease, dividends, benefits, payments and/or remuneration for service on boards and/or committees.

Request for Production No. 5: Documents showing Linda Carl's ownership or leasehold interest in any real property, and ownership or leasehold interest of any business owned and/or operated by Linda Carl located anywhere in the world, including but not limited to certificates of title, deeds of trust, registration certificates, leases or subleases.

Request for Production No. 6: Business licenses for businesses operated by or on behalf of Linda Carl.

DATED: December 10, 2014.



Nora E Sigrāh
Attorney for Plaintiff
FSM Development Bank

CERTIFICATE OF SERVICE

The undersigned hereby certifies that true and correct copies of the foregoing Request for Production of Documents were served this 10th day of December 2014 upon:

Yoslyn Sigrāh
PO Box 3018
Kolonias, Pohnpei, FM 96941

VIA HAND DELIVERY

Vincent Kallop
MLSC - Pohnpei Office
PO Box 129
Kolonias, Pohnpei, FM 96941

VIA HAND DELIVERY

