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ATTORNEY FOR PLAINTIFF

12/10/14  
DATE: 12/10/14 TIME: 10:18 am  
By: *[Signature]*  
CLERK, FSM SUPREME COURT  
POHNPEI TRIAL DIVISION

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

FSM Development Bank, ) CIVIL ACTION NO. 1996-060  
)  
Plaintiff, )  
v. ) PLAINTIFF'S REQUEST FOR  
) PRODUCTION OF DOCUMENTS  
) TO THE ESTATE OF YOSHIRO  
Linda Carl and the Estate of ) CARL  
Yoshiro Carl, )  
) FSM Civil Rules 34 and 69  
Defendants. )  
\_\_\_\_\_ )

TO: Linda Carl, Co-Administrator, c/o Attorney Yoslyn Sigrah  
And  
Fred Carl, Co-Administrator, c/o Attorney Vincent Kallop

FSM Development Bank ("FSMDB") submits this request for production of documents to Defendant Estate of Yoshiro Carl, through Co-Administrators Linda Carl and Fred Carl, 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 name of the Estate of Yoshiro Carl and/or Linda Carl as Co-Administrator and/or Fred Carl as Co-Administrator, individually or jointly with others, or under his/her/their direct or indirect control, including but not limited to accounts for all businesses owned and/or operated by or on behalf of the Estate of Yoshiro Carl, and/or by Co-Administrator Linda Carl and/or Co-Administrator Fred 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 the Estate of Yoshiro Carl, and/or Linda Carl as Co-Administrator, and/or Fred Carl as Co-Administrator, any business owned and/or operated by Co-Administrator Linda Carl on behalf of the Estate of Yoshiro Carl and/or Co-Administrator Fred Carl on behalf of the Estate of Yoshiro Carl, and/or any business from which Co-Administrator Linda Carl and/or Co-Administrator Fred Carl received, receives or is entitled to income on behalf of the Estate of Yoshiro Carl.

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 any business operated by or on behalf of the Estate of Yoshiro Carl.

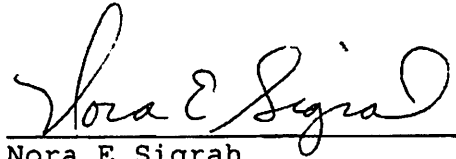
Request for Production No. 4: Any record, compilation or summary of income or compensation that the Estate of Yoshiro Carl and/or Linda Carl as Co-Administrator and/or Fred Carl as Co-Administrator has received from any source in 2014, including but not limited to interest, lease, dividends, payments, profit-sharing.

Request for Production No. 5: Documents showing Yoshiro Carl's, and/or the Estate of Yoshiro Carl's, and/or Linda Carl as Co-Administrator and/or Fred Carl Co-Administrator ownership or leasehold interest in any real property, and ownership or leasehold interest of any business 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 the Estate of Yoshiro Carl and/or Linda Carl as Co-Administrator and/or Fred Carl as Co-

Administrator.

DATED: December 10, 2014.



Nora E Sigrah  
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 10<sup>th</sup> day of December 2014 upon:

Yoslyn Sigrah  
PO Box 3018  
Kolonia, Pohnpei, FM 96941

VIA HAND DELIVERY

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

VIA HAND DELIVERY

