

FILED
11/28/14 TIME: 110

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CLERK, FSM SUPREME COURT
POHNPEI
TRIAL DIVISION

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Attorneys for Plaintiff, KENNETH HARTMAN and heirs of Anceto Hartmann,

IN THE SUPREME COURT OF THE
FEDERATED STATES OF MICRONESIA
TRIAL DIVISION-POHNPEI

KENNETH HARTMAN, on
Behalf of himself and the
family of Anceto Hartman,
Deceased,

Plaintiffs,

vs.

BETHWEL HENRY, in his
Capacity as the President
Of the Board of Directors of
U Corporation,
ROBERT ARTHUR, in his Capacity
As the General Manager of U
Corporation and U Corporation.

Defendants,

CIV. ACTION NO. 2012-031

PLAINTIFF'S REQUEST FOR INTERROGATORIES
AND PRODUCTION OF DOCUMENTS

PROPOUNDING PARTY:

KENNETH HARTMAN on behalf of the heirs of
Anceto Hartman.

RESPONDING PARTY:

BETHWEL HENRY in his capacity as the President of the
Board of Directors of U Corporation, ROBERT ARTHUR in
his capacity as the General manager of U Coproration, and
U CORPORATION

INSTRUCTIONS

1. In answering these interrogatories, you are required to furnish all information known or available to you regardless of whether this information is possessed

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INSTRUCTIONS

1. In answering these interrogatories, you are required to furnish all information known or available to you regardless of whether this information is possessed

directly by you or by your agents, employees, representatives, investigators or any other person acting on your behalf.

2. Within 30 days after you are served with the interrogatories, you must serve your responses on the asking party and serve copies of your responses on all other parties to the action who have appeared. See Rules of Civil Procedures for FSM Supreme Court, Rule 33 for details.
3. If any of these interrogatories cannot be answered in full, answer to the extent possible, specifying the reasons for your inability to answer the remainder and stating whatever information, knowledge, or belief you do have concerning the matter inquired about.
4. These interrogatories are continuing in nature. If, after answering the interrogatories, you obtain or become aware of any further information responsive to these interrogatories, it is required that it be made a supplemental interrogatory answer.
5. State whether the information furnished is within the personal knowledge of the person answering the interrogatory and, if not, the name of each person to whom the information is a matter of personal knowledge if known.
6. These interrogatories shall be answered in writing and under oath.

INTERROGATORIES

1. Please state the name of the person or persons answering each interrogatory.
2. How many shares were issued to Mr. Anceto Hartman.

3. How many shares were issued to Mr. Hartman for the rental payment.
4. Was Mr. Hartman or any of his family members ever receive notice to review defendant U Corporation books as provided under Article V of the lease.
5. Was Mr. Hartman ever received notice to have his authorize representative audit or review defendant U Corporation books.
6. How many times was a Standard Accounting report submitted to plaintiff.
7. When vacating the premises, did defendants remove all structure remaining on the land used for the lease.
8. How many times did defendant U corporation hold their annual meetings during the duration of its business in Pohnpei.
9. How many times defendant U Corporation did changed their Board members.
10. Aside from the monthly rents, is there any other compensation paid to Mr. Hartman.
11. Did defendants pay the last rental for the lease, May 2014?

DEFINITIONS

1. "Documents" or "writings" shall include all writings as defined by the Rules of Civil Procedure.
2. A request to "identify" a writing or document means a request either to attach such as an exhibit to your answers to these interrogatories, or to describe such with sufficient specificity that it may be made to subject of a request for production of documents. Your descriptions should include, with limitation, an indication of (a) the author; b) addressee(s); c) its date; (d) the nature of the writing or document (e.g. letter, telephone memorandum, tape-recording,

photograph, diagram,. Etc) (e) a summary of description of the contents; and (f) the present location and custodian thereof.

3. The word identify when used with respect to an act, occurrence, state or conduct means (a) to describe the substance of the event or events constituting such acts, and state the date when such act occurred; (b) to identify each of and every person participating in such act; (c) to identify each and every person present when such act occurred; (d) to state whether a memorandum, note or other record exists of such act; (e) to state whether such record now exists; (f) to identify the person or persons presently having possession, custody, or control of such record.
4. A request to identify a person or individual means to state his or her name, place of employment, present business or home address and telephone number.

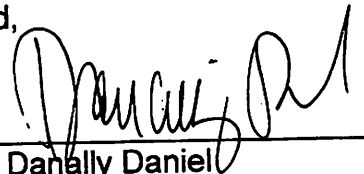
REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 34 of the Rules of Civil Procedures of FSM Supreme Court, you are hereby requested to produce the following documents:

1. Receipts or any documents showing shares issued to Anceto Hartman.
2. Notices issued to Mr. Hartman to have his authorize representative review and audits books and documents of defendant U Corporation.
3. Copies of standard Accounting report submitted to Mr. Hartman or any member to his family.
4. Copies of the minutes for the annual meetings of U Corporation.

5. Names of individuals elected to be members of the Board of Defendant U Corporation.
6. Please list each member's names and the year they served.
7. Receipts of payments made to Mr. Hartman aside from the rental payments.
8. Receipt of May 2014 rental payment.

Respectfully submitted,


Danally Daniel
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this ___ day of November, 2014, I caused to have a copy of the foregoing Plaintiff's request for discovery served upon the opposing counsel by having the same postal mailed to the following address:

Douglas F. Cushnie
P.O. Box 500949
Saipan MP, 96950

Dated: November 28, 2014

