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9 **Attorneys for Plaintiffs:**
10 **PEOPLE OF THE MUNICIPALITY**
OF EAURAPIK, YAP STATE

FILED
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DATE: _____ TIME: _____
By: 
CLERK, FSM SUPREME COURT
YAP
TRIAL DIVISION

11
12 **IN THE SUPREME COURT OF**
13 **THE FEDERATED STATES OF MICRONESIA**
14 **TRIAL DIVISION – STATE OF YAP**

15 THE PEOPLE OF THE MUNICIPALITY
EAURAPIK, YAP STATE, by and through
16 SANTOS SARONGELFEG, JOHN
HAGLELGAM, and MOSES MOGLIG,

CIVIL ACTION NO. 2011-3002

17 Plaintiffs,
18 vs.

STIPULATION TO ORDER RE: (1)
EXTENSION OF TIME TO TO TAKE
DEPOSITION OF MIKE HASURMAI;
TO CONTINUE 30(b)(6) DEPOSITION
OF HSIN HORNG; TO FILE PRETRIAL
MOTIONS; AND (2) TO CANCEL
NOTICE AND SUBPOENA FOR
DEPOSITION OF MIKE HASURMAI;
AND TO WITHDRAW MOTION TO
COMPEL DEPOSITION OF MIKE
HASURMAI

19 F/V TERAKA 168, *in rem*, F/V FU KUAN
606, *in rem*, F/V YUH YOW 127, *in rem*,
20 their engines, masts, bowspirits, boats,
anchors, chains, cables, rigging, apparel,
21 furniture, and all necessities thereunto
pertaining,

22 *In Rem* Defendants.

23 YUH YOW FISHERY COMPANY LTD.,
MARIN MARAWA, LTD., MASANAGA
24 SHIMAZU, CAPTAIN EDGAR R.
PELAEZ, MALAYAN TOWAGE AND
25 SALVAGE CORPORATION, CITY PRO
MANAGEMENT LIMITED, and HSIN
26 HORNG FISHERY CO., LTD.

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In Personam Defendants,

THE FEDERATED STATES OF
MICRONESIA NATIONAL
GOVERNMENT,

Intervenor Plaintiff.

COME NOW Plaintiffs The People of the Municipality of Eaurapik, Yap State, by and through SANTOS SARONGELFEG, JOHN HAGLELGAM, and MOSES MOGLIG, and Defendants F/V TERAKA 168, *in rem*, F/V YUH YOW 606, *in rem*, , YUH YOW FISHERY COMPANY LTD., MARIN MARAWA, LTD., MASANAGA SHIMAZU, MALAYAN TOWAGE AND SALVAGE CORPORATION, and HSIN HORNG FISHERY CO., LTD., through counsel undersigned, respectively, and Stipulate to an Order to enlarge time and extend the discovery deadline in order to take the deposition of Mike Hasurmai in his capacity as a percipient and designated expert witness, to take the continued deposition of a Hsin Horng representative pursuant to FSM R. Civ. Pro. 30 (b)(6), and to file pretrial motions.

On or about April 12, 2013, Mike Hasurmai departs for Eaurapik Atoll in Yap State on the Field Trip Ship in order to further study and conduct reef survey assessment for the purposes of this case and perform reef damage assessment work at Eaurapik Atoll. His estimated date of return is approximately April 30, 2013. In addition, Defendants have agreed to make available a Hsin Horng representative for a continued deposition.

1. Defendants' and Plaintiffs' counsel have met and conferred in good faith and hereby stipulate to the extension of the discovery deadline date to allow Mike Hasurmai to complete his work and travel to Eaurapik Atoll and provide a report to Plaintiffs' and Defendants' counsel.

1 2. Defendants' counsel shall be allowed an additional thirty (30)
2 days after receiving said Hasurmai report to take the deposition of Mike Hasurmai on
3 a date and hour of mutual convenience to all counsel undersigned below.

4 3. Defendants' and Plaintiffs' counsel have met and conferred in
5 good faith and hereby stipulate to the extension of the discovery deadline date to
6 allow for the continued deposition of a Hsin Horng representative.

7 4. Plaintiffs' counsel shall be allowed an additional thirty (30) days
8 after April 30, 2013 to take the deposition of a representative of Hsin Horng on a date
9 and hour of mutual convenience to all counsel undersigned below.

10 5. Defendants' Subpoena and Notice of Deposition filed March 28,
11 2013 for the deposition of Hasurmai on April 15, 2013 in his capacity as a percipient
12 witness is cancelled.

13 6. Defendants' Motion to Compel the Deposition of Hasurmai filed
14 on March 28, 2013 is withdrawn.

15 7. The parties have further conferred and, based upon the extended
16 discovery deadlines stated above, stipulate that the parties may have an additional
17 thirty (30) days after May 31, 2013 (the present deadline to file pretrial motions) to file
18 Pretrial Motions and that for any such motion filed shall confer in good faith to set a
19 briefing schedule for Opposition and Reply briefs.

20 **SO STIPULATED:**

21 **BERMAN O'CONNOR & MANN**
22 Attorneys for Plaintiffs:

Daniel J. Berman

23 Dated: _____

By:

24 **DANIEL J. BERMAN**

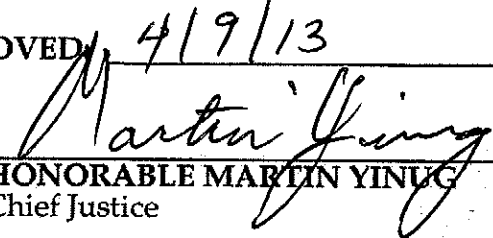
25 **CABOT MANTANONA LLP**
26 Attorneys for Appearing Defendants:

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Dated: 4/9/2013

By: 
DAVID LEDGER

IT IS SO ORDERED AND APPROVED 4/9/13

HONORABLE MARTIN YINUG
Chief Justice