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FILED
DISTRICT COURT OF GUAM
OCT 01 2003
MARY L. M. MORAN
CLERK OF COURT

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8 Attorneys for Plaintiff Shell Guam, Inc.

9 **IN THE DISTRICT COURT OF GUAM**

10 SHELL GUAM, INC.,) CIVIL CASE NO. CIV03-00021
11 a Guam corporation,)
12)
13 Plaintiff,) APPLICATION FOR ORDER OF SALE
14 vs.) OF DEFENDANT GYOKO MARU NO.
15) 18 BY PLAINTIFF SHELL GUAM, INC.
16 M/V GYOKO MARU NO. 18)
17 and NIKKI SUISAN CORPORATION,)
18 a Japan corporation,)
19 Defendants.)

20 COMES NOW, Plaintiff Shell Guam, Inc. and applies this Court for an Order of Sale of
21 Defendant M/V Gyoko Maru No. 18, pursuant to FRCP 55(b) and Local Admiralty Rule 14 and
22 based upon the Declaration of Steven A. Zamsky filed herewith.

- 23 1. Default against Defendant M/V Gyoko Maru No. 18 was entered on September 15,
24 2003.
25 2. A proposed Final Judgment by Default in favor of Plaintiff Shell Guam, Inc. and
26 against Defendant M/V Gyoko Maru No. 18 is filed herewith for the principal amount of
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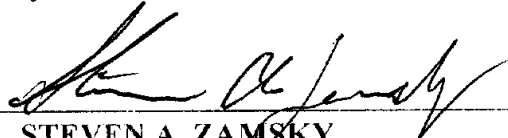
\$43,367.63 together with interest accrued as of the date of September 30, 2003 in the amount of \$7,806.17 and plus further interest at the rate of \$35.72 per day to the date Final Judgment by Default was entered, and thereafter interest accruing as required by law, together with attorneys fees and costs and custodial expenses to the date of sale.

3. Plaintiff Shell Guam, Inc. request that the proposed Order of Sale be entered following the entry of Final Judgment by Default on the terms set forth in the proposed Order of Sale.

4. Plaintiff Shell Guam, Inc. request that the date of Sale be on the 14th day following by the entry of said Order of Sale.

Dated this 1 day of October 2003.

ZAMSKY LAW FIRM
Attorneys for Plaintiff Shell Guam, Inc.

By: 
STEVEN A. ZAMSKY