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FILED
DISTRICT COURT OF GUAM
OCT 23 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)
12 Plaintiff,)
13 vs.) DECLARATION OF STEVEN A.
14 M/V GYOKO MARU NO. 18) ZAMSKY IN SUPPORT OF PLAINTIFF
15 and NIKKI SUISAN CORPORATION,) SHELL GUAM, INC.'S APPLICATION
16 a Japan corporation,) FOR ORDER OF SALE OF DEFENDANT
17 Defendant.) M/V GYOKO MARU NO. 18

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19 I, Steven A. Zamsky, declare as follows:

- 20 1. I am an attorney admitted to practice law in Guam USA.
21 2. I am the attorney of record for Plaintiff Shell Guam, Inc. (hereinafter "Plaintiff").
22 3. I make this Declaration in Support of Plaintiff's Application for Order of Sale of
23 Defendant M/V Gyoko Maru No. 18 (hereinafter "Vessel") and having personal knowledge of all
24 matters set forth herein if called to testify as to said matters I could and would competently do so.
25 4. The Default against the Vessel was entered on September 15, 2003. The Vessel is
26 sitting idle and is deteriorating and should be sold at the earliest reasonable time.
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5. I have received no contact from any person with regard to any potential claim with respect to the Vessel.

6. On October 22, 2003 at approximately 2:00 p.m. I telephoned the United States Marshal Service and spoke with Richard Lumagui, who is presently the Acting United States Marshal, with respect to a sale date the Vessel. Mr. Lumagui informs me that a November 2003 sale is satisfactory with the United States Marshal Service.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 23 day of October 2003.



STEVEN A. ZAMSKY

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