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1 FEDERATED STATES OF MICRONESIA  
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11 IN THE SUPREME COURT FOR THE  
12 FEDERATED STATES OF MICRONESIA  
13 TRIAL DIVISION - STATE OF POHNPEI

15 STATE OF CHUUK, et al., ) CIVIL ACTION No. 1995-085  
16 )  
17 Plaintiffs, ) THE FSM'S RESPONSES TO  
18 ) PLAINTIFFS' REQUEST FOR  
19 vs. ) PRODUCTION OF DOCUMENTS  
20 )  
21 THE SECRETARY OF THE )  
22 DEPARTMENT OF FINANCE, et al., )  
23 )  
24 Defendants. )

26  
27 The Federated States of Micronesia responds as follows to plaintiffs' Request for  
28 Production of Documents, dated August 17, 1995.  
29

31 **GENERAL OBJECTIONS**

32  
33 The FSM makes the following objections to each and every one of the Requests  
34 for Production of Documents.  
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36  
37 1. The documents requested are not relevant to the subject matter of this action  
38 nor are they reasonably calculated to lead to the discovery of admissible evidence. Thus,  
39 the documents are not discoverable under FSM Civil Rule 26(b). This action seeks  
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1 merely declaratory relief; it does not seek damages, nor does it seek an accounting.

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3 Moreover, the action does not concern a dispute over the terms of any foreign fishing  
4  
5 agreement.

6  
7 2. The requests are over broad and unduly burdensome in relation to the issues  
8  
9 presented in this case.

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11 **SPECIFIC OBJECTIONS**

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13 In addition to the above, the FSM makes the following objection to Request 4:

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15 The request encompasses documents protected from discovery by the attorney  
16  
17 work product and attorney client privilege doctrines in connection with enforcement  
18  
19 actions undertaken by the Attorney General's Office. Such documents will not be  
20  
21 produced.

22  
23 These responses are dated this 17<sup>th</sup> day of September, 1995.

24  
25 **FEDERATED STATES OF MICRONESIA**  
26 **CAMILLO NOKET, ATTORNEY GENERAL**

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30 By: Carole Rafferty  
31 Carole Rafferty  
32 Assistant Attorney General  
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1 Pursuant to agreement with counsel for plaintiffs, the original and one copy of this  
2 document was served on September 18, 1995 by hand delivery to the office of counsel  
3 listed below.

4  
5  
6 Hand Delivery

7  
8 Andrea Hillyer  
9 Office of the Attorney General  
10 State of Pohnpei  
11 Kolonia, Pohnpei 96941

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