

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DISTRICT OF ST. THOMAS & ST. JOHN**

<p>GREAT ST. JIM, LLC,</p> <p style="padding-left: 40px;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>DEPARTMENT OF PLANNING AND NATURAL RESOURCES and DAWN HENRY In Her Official Capacity as Commissioner of the Department of Planning and Natural Resources,</p> <p style="padding-left: 40px;">Defendants.</p> <hr style="width: 100%;"/>	<p>)</p>	<p>CIVIL NO. ____ / 2017</p>
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PLAINTIFF’S RULE 26 INITIAL DISCLOSURES

COMES NOW Plaintiff **GREAT St. JIM, LLC**, by and through **KELLERHALS FERGUSON KROBLIN PLLC**, and hereby submits the following for its Rule 26 Initial Disclosures. Plaintiff reserves the right to supplement this response.

1. The name and, if known, the address and telephone number of each individual likely to have discoverable information that Plaintiff may use to support its claims or defenses.
 - a. Plaintiff - can be contacted through counsel.
 - b. Dawn Henry
 - c.

2. A copy, or description by category and location, of all documents, electronically stored information, and tangible things that Plaintiff has in its possession, custody, or control and may use to support its claims and defenses.

3. A computation of each category of damages claimed by Plaintiff.
 - a. Cost to move moorings:
 - b. Loss of use

\$20,000 per day x _____ days = _____

- c. _____
- d. Any and all costs of prosecuting this action, including legal fees, which Plaintiff has incurred and continues to incur in association with this suit.
- e. Plaintiff is still investigating its losses and reserves the right to amend the foregoing.
4. Any insurance agreement under which an insurance business may be liable to satisfy all, or part, of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Not applicable.

Respectfully,

Dated: December ____, 2016

CHRISTOPHER ALLEN KROBLIN, ESQ.
MARJORIE WHALEN, ESQ.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this ____ day of December, 2016, I caused a true and exact copy of the foregoing **Plaintiff's Rule 26 Disclosures** to be served via first class mail, postage prepaid, upon: