



10. That as to count (11) and (12) of the Co- Defendant's Ministry of Education Answer, Plaintiff says further that she maintains and re- confirms the entire Complaint that Co- Defendant's Ministry of Education along with Co- Defendant's Ministry of Health & Social Welfare should be held liable for the malicious and calculated plan perpetrated against Plaintiff to damage, defame and subject Plaintiff to public ridicule especially, without due process when indeed and intruth, Plaintiff met the pre- requisite to operation as an institution. Count (11) and (12) of the Answer should therefore be dismissed.

11. Plaintiff denies all and singular the allegation of both law and fact as are set forth and contained in Co- Defendant's Ministry of Education Answer count (1) thru (12) which have been made subject of special traverse.

WHEREFORE, and in view of the foregoing, Plaintiff prays Your Honor and this Honorable Court to dismiss and deny Co- Defendant's Ministry of Education answer in its entirety, rule the cost against Co- Defendant and grant unto Plaintiff any and all further relief as the end of justice demand.

RESPECTFULLY SUBMITTED
The above named PLAINTIFF
By & thru her legal counsel
WEAH & ASSOCIATE'S LAW OFFICES
109 ASHIMUN STREET, OPPOSITE TELECOM

Dated this 6th day of
February, A.D. 2006



ATTORNEYS AND COUNSELLOR AT LAW

Stamp Revenue stamp affixed
on the original copy

REPUBLIC OF LIBERIA)
MONTERRADO COUNTY)

IN THE OFFICE OF THE JUSTICE OF PEACE FOR
MONTERRADO COUNTY, CITY OF MONROVIA,
LIBERIA

St. Luke School of Medicine)
Represented by and thru its President Jerroll)
Dolphin and all of its officials/ authorized Agent)
PLAINTIFF)

VERSUS)

ACTION: DAMAGES FOR WRONG

The Ministry of Health & Social Welfare)
Represented by and thru its Minister and The)
Ministry of Education represented by and thru)
It's Minister and all of their principal Deputies)
And all of those working under the scope of)
Authority, Republic of Liberia.)
DEFENDANTS)

PLAINTIFF'S AFFIDAVIT

PERSONALLY APPEARED BEFORE ME, the undersigned, a duly qualified Justice of the Peace
for Monterrado County, at my office in the City of Monrovia, Liberia Counsellor Ignatius N. Weah,
counsel of PLAINTIFF in the above entitled cause of action and made Oath according to the
law and facts as set forth and contained in the annexed PLAINTIFF'S REPLY, are true and
correct to the best of his knowledge and belief, and as these matters of information received, he
truly believes them to be true and correct.

SWORN AND SUBSCRIBED TO BEFORE ME
THIS 6th DAY OF Oct A.D. 2006



JUSTICE OF THE PEACE FOR MONTERRADO COUNTY, LIBERIA



IGNATIUS N. WEAH ONE OF
COUNSELLOR FOR PLAINTIFF / DEPENDENT

Exhibit 25 - SLSOM FILES RESPONDENT'S RESISTANCE

REPUBLIC OF LIBERIA) IN THE CIVIL LAW COURT, SIXTH JUDICIAL CIRCUIT,
 MONTERRADO COUNTY) MONTERRADO COUNTY, SITTING IN ITS SEPT. TERM, A.D. 2006

BEFORE HIS HONOUR: EMERY S. PAYE, ...ASSIGNED CIRCUIT JUDGE

The Ministry of Health & Social)
 Welfare, represented by & thru)
 its Minister (MOVANT))

VERSUS)

MOTION TO DISMISS

St. Luke School of Medicine,)
 represented by & thru its President,)
 Jerrroll Dolphin and all of its officials)
 authorized Agents, all of the City of)
 Monrovia,)
 Liberia (RESPONDENTS))

GROWING OUT OF THE CASE:

St. Luke School of Medicine)
 Represented by & thru its)
 President, Jerrroll Dolphin and all of)
 its officials authorized Agents, all of)
 the City of Monrovia,)
 Liberia (PLAINTIFF))

VERSUS)

ACTION OF DAMAGES FOR WRONG

The Ministry of Health & Social)
 Welfare, represented by and thru)
 its Minister and the Minister of)
 Education thru its Minister and all)
 those working under the scope of)
 authority,)
 R.L. (DEFENDANTS))

MOVANT'S MOTION

MOVANT IN THE ABOVE ENTITLED CAUSE OF ACTION, most respectfully moves this Honourable Court for a dismissal of Respondent/Plaintiff's Action of Damages for Wrong and for the factual and legal reasons showeth as follows:

1. That because Movant submits and contends that the Respondent St. Luke School of Medicine lacks legal capacity to institute any action in this Republic, said institute not being a lawful and legal entity operating under the laws of Liberia, and that the laws of Liberia cannot and will not condone, sanction support and ratify any illegality and nobody can benefit from its own illegal acts.
2. That the Respondent/Plaintiff being and having been falsely created by its 419 incorporators in persons of Dr. Jerrroll Dolphin, Dr. Meimei Dukuly, Mr. Frank E. Yeah as well as their PROVOST Dr. Peter Coleman, under the most dubious criminal circumstances, said institution cannot benefit from its own illegal acts, fraud and misrepresentation.
3. That because only the ministry of Foreign Affairs of the Republic of Liberia is authorized by law to publish all legislative enactments in HANDBILL, and to approve articles of incorporation to establish legal entities under the Association Laws of Liberia, both the House of Representatives (NTLA) and the Foreign Ministry of Liberia having denied the legal existence of the so-called St. Luke School of Medicine within the Republic of Liberia, said bogus St. Luke School of Medicine cannot now benefit from its own illegality because, for what is not done legally is not done at all, and that Respondent is 419 institution/university organized by the gang of four fraudsters including Peter's Coleman, Meimei Dukuly, Jerrroll Dolphin and Frank E. Yeah, must be arrested for planning a time bomb to exterminate the entire population of Liberia by means of spreading medical virus as graduates of medical school or doctors.

That because Movant further prays court to order and declared null and void the articles of incorporation as well as the alleged legislative enactment which was never the end product of NTLA as alleged by Respondent/Plaintiff in its complaint. Movant gives notice that at trial he will produce copy of fake medical degree issued to the so-called graduates of St. Luke School of Medicine, even though, the school does not exist de jure and de facto. See attached copy of NTLA Report.

WHEREFORE, AND IN VIEW OF THE FOREGOING, MOVANT most respectfully prays court to deny and dismiss Respondent/Plaintiff's complaint in its entirety, rule costs of these proceedings against the Respondent, order the so-called St. Luke School of Medicine Closed, and grant unto Movant all further relief as Your Honour may deem just, legal, transparent and equitable in the instant.



Respectfully submitted,
The above named MOVANT,
By & thru its Legal Counsel,
TULAY & ASSOCIATES

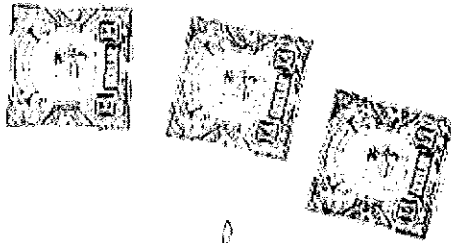
Fomba O. Sheriff
COUNSELLOR-AT-LAW

Dated this 20th day of September AD 2008.

\$5.00 Revenue Stamps affixed on the Original

MOVANT'S AFFIDAVIT

PERSONALLY APPEARED BEFORE ME, a duly qualified Justice of the Peace for and in Montserrado County, Republic of Liberia, at my office in the City of Monrovia, Liberia, Fomba O. Sheriff, COUNSELLOR-AT-LAW and one of Counsel for MOVANT in the above entitled cause of Action and Made Oath according to law that all and singular the allegations of facts and law as are set forth and contained in the foregoing and annexed MOVANT'S MOTION TO DISMISS are true and correct to the best of his knowledge and belief, and as to those matters of information thereto relating as relied upon, he verily believes them to be true and correct.



SWORN AND SUBSCRIBED TO BEFORE
ME AT THE OFFICE IN THE CITY OF
MONROVIA, LIBERIA THIS 20th DAY OF
SEPTEMBER



JUSTICE OF THE PEACE, MONT CO., R.L.

Fomba O. Sheriff
COUNSELLOR-AT-LAW & ONE OF COUNSEL
FOR MOVANT, DEPONENT/AFFIANT

\$5.00 Revenue Stamps affixed on the Original.

.../2

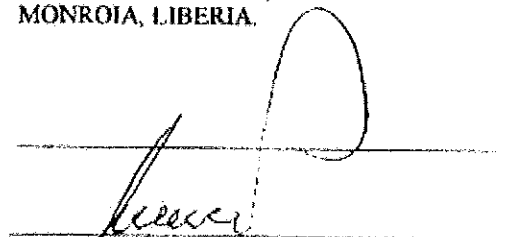
Movant Ministry of Health & Social Welfare to question the credibility and status of Plaintiff/ Respondent's Incorporators thus referred to them as criminals. Respondent/ Plaintiff contends and says that count (2) of the Motion being far from the truth and the crux of Plaintiff's Complaint should therefore be dismissed.

4. That as to count (3) and (4) of the Movant's Ministry of Health & Social Welfare Motion, Respondent/ Plaintiff frowns and contends at said averment and says that same should therefore be dismissed because said averment is a complete admission since indeed and intruth Movant has established that Plaintiff/ Respondent's Articles of Incorporation as well as the Legislative Enactment have not been revoked nor declared null and void by any courts of competent jurisdiction within the Republic of Liberia, since Movant now praying court to declare Plaintiff/ Respondent's Articles of Incorporation and the Legislative Enactment null and void. Count (3) and (4) of the Motion should therefore be dismissed.

5. Plaintiff/ Respondent denies all and singular the allegation of Movant's Motion counts (1) thru (4) which have not been made subject of special travers.

WHEREFORE, and in view of the foregoing, Respondent/ Plaintiff prays Your Honor to dismiss and deny Movant/ Defendant's Motion in its entirety and rule the cost of these proceedings against Movant/ Defendant and grant unto Respondent any and all further relief as the end of justice demand.

REPECTFULLY SUBMITTED:
The above named PLAINTIFF/ RESPONDENT
By and thru her Legal Counsel
WEAH AND ASSOCIATES LAW OFFICES
109 ASHMUN STREET, OPPOSITE TELECOM
MONROIA, LIBERIA.



ATTORNEYS AND COUNSELLORS-AT-LAW

Dated September 30, 2006.

\$ 4 00 Revenue Stamp affixed to the original copy.

REPUBLIC OF LIBERIA) IN THE OFFICE OF THE JUSTICE OF PEACE FOR
 MONTERRADO COUNTY) MONTERRADO COUNTY, CITY OF MONROVIA,
 LIBERIA

The Ministry of Health & Social Welfare,)
 Represented by and thru its Minister)
 MOVANT)

VERSUS)

MOTION TO DISMISS

St Luke School of Medicine, represented by)
 and thru its President, Jerroll Dolphin and all)
 of its officials authorized Agent, all of the city)
 of Monrovia, Liberia..... RESPONDENTS)

GROWING OUT OF THE CASE:

St Luke School of Medicine)
 Represented by and thru its President, Jerroll)
 Dolphin and all of its officials' authorized Agent)
 PLAINTIFF)

VERSUS)

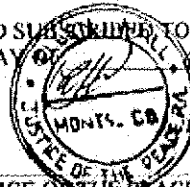
ACTION: DAMAGES FOR WRONG

The Ministry of Health & Social Welfare,)
 Represented by and thru its Minister and The)
 Ministry of Education, represented by and thru)
 It's Minister and all of their principal Deputies,)
 And all of those working under the scope of)
 Authority, Republic of Liberia,)
 DEFENDANTS)

RESPONDENT'S AFFIDAVIT

PERSONALLY APPEARED BEFORE ME, the undersigned, a duly qualified Justice of the Peace
 for Monterrado County, at my office in the City of Monrovia, Liberia Counsellor Ignatius N. Weah,
 one of counsel of RESPONDENT in the above entitled cause of action and made Oath according to
 the
 law and facts as set forth and contained in the annexed RESPONDENT'S RESISTANCE, are true
 and
 correct to the best of his knowledge and belief, and as these matters of information received, he
 verify believes them to be true and correct

SWORN AND SUBSCRIBED TO BEFORE ME
 THIS 24 DAY OF FEBRUARY, A.D. 2006



JUSTICE OF THE PEACE MONT. CO. RL

[Signature]

 CLLR. IGNATIUS N. WEAH ONE OF
 COUNSEL FOR RESPONDENT / DEPONENT

Exhibit 26 - SLSOM FILES REQUEST FOR SUMMARY JUDGMENT

REPUBLIC OF LIBERIA) IN THE CIVIL LAW COURT, SIXTH JUDICIAL CIRCUIT,
 MONTSERRADO COUNTY) MONTSERRADO COUNTY, SITTING IN ITS SEPTEMBER
 TERM A. D. 2006

BEFORE HIS HONOR EMERY S. PAYE, ASSIGNED CIRCUIT JUDGE.

St. Luke School of Medicine
 Represented by and thru its President, Jerrold
 Dolphin and all of its officials/ authorized Agent
 Of the City of Monrovia, Liberia. MOVANT

FILED
EMERY S. PAYE

VERSUS

ACTION MOTION FOR SUMMARY
 JUDGMENT

The Ministry of Health & Social Welfare,
 Represented by and thru its Minister and The
 Ministry of Education, represented by and thru
 It's Minister and all of those working under the
 scope of Authority. RESPONDENTS

GROWING OUT OF THE CASE:

St. Luke School of Medicine
 Represented by and thru its President, Jerrold
 Dolphin and all of its officials/ authorized Agent
 PLAINTIFF

VERSUS

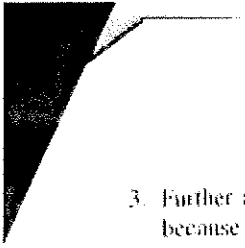
ACTION DAMAGES FOR WRONG

The Ministry of Health & Social Welfare,
 Represented by and thru its Minister and The
 Ministry of Education, represented by and thru
 It's Minister and all of their principal Deputies,
 And all of those working under the scope of
 Authority, Republic of Liberia.
 DEFENDANTS

MOVANT'S MOTION

Movant in the above entitled cause of action, most respectfully moves this Honorable Court in manner and form as follow, to wit: -

1. Movant is Plaintiff in an Action of Damages for Wrong which is pending before this Honorable Court undetermined. Movant request Your Honor to take judicial notice of records in the case file
2. Movant says and avers that Summary Judgment will lie since indeed and intruth Respondent herein are government institution which ought to be concise on the subject proceedings, but because Co- Respondent Ministry of Education admitted and agreed that indeed Movant/ Plaintiff met the pre- requisite to operate Medical School since indeed Movant secured her Articles of Incorporation, Letters of Accreditations from the appropriate government agencies and a Legislative Enactment which Co- Respondent Ministry of Education did not deny while Co- Respondent Ministry of Health & Social Welfare conceded that due process has not been accorded Movant/ Plaintiff and therefore same suggests that it was erroneous and illegal to declare Movant/ Plaintiff's institution bogus and closed same down without due process, especially in the face of all those relevant documents



3. Further above, Movant/ Plaintiff says and submits that summary judgment will lie because Co- Respondent Ministry of Education failed, refused and neglected to traverse on any of the counts in Plaintiff's Complaint nor made a general denial but instead made a naked and empty statement as though she was the complainant while Co- Respondent Ministry of Health & Social Welfare admitted that even though President Taylor signed said Enactment empowering Plaintiff to operate a medical school but did so under international pressure, as such, in-as-much President Taylor was in power what ever function was exercised by him during his tendency, same was legal and genuine, therefore, the Act empowering Plaintiff to operate cannot be questioned.

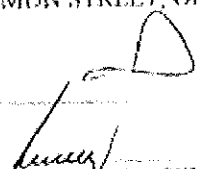
4. Movant/ Plaintiff says and submits the averments put forth in Defendants/ Respondents ought to be collaborative and concise but same is the contrary, in that, at one point of time Co- Respondent Ministry of Education admitting to the authenticity of Movant/ Plaintiff's credentials but argued that because Plaintiff does not have school yard while Co- Respondent Ministry of Health & Social Welfare agrees in principal that indeed President Taylor did signed or approved said Bill Enacting Plaintiff's institution to operate as medical school but claim same was done under international pressure, and also agreed that those who duly accredited Movant/ Plaintiff was authorized to do so but did same under a organized scheme. The question is granted and not admitting that same is true, were is the findings that established that those who accredited Movant/ Plaintiff did so clandestinely? Where are the records to show that indeed Movant/ Plaintiff was accorded due process as made and provided by operation of law, that is, which court of competent jurisdiction has adjudged Plaintiff/ Movant liable or guilty for such a bogus and misleading allegation? The failure on the part of Defendants/ Respondents to so do, same constitutes an admission and therefore Summary Judgment will lie.

5. Movant/ Plaintiff says this Motion is filed in good fate and not to baffle speedy trial

WHEREFORE, and in view of the foregoing, Movant/ Plaintiff request Your Honor to grant her Motion of Summary Judgment against Co- Respondent/ Co- Defendant herein and hold her liable to Plaintiff and grant unto Movant/ Plaintiff any and all further relief as the end of justice demand

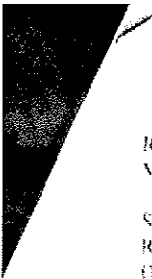
RESPECTFULLY SUBMITTED
 The above named PLAINTIFF
 By & thru her legal counsel
 WEAH & ASSOCIATES LAW OFFICES
 109 ASHIMUN STREET, OPPOSITE TELECOM.

Dated this 10th day of
 October A.D. 2006



 ATTORNEYS AND COUNSELLOR-AT-LAW

\$4.00 Revenue stamp affixed
 on the original copy



REPUBLIC OF LIBERIA) MONTERRADO COUNTY)	IN THE OFFICE OF THE JUSTICE OF PEACE FOR MONTERRADO COUNTY CITY OF MONROVIA LIBERIA)
St. Luke School of Medicine) Represented by and thru its President Jerrrol) Dolphin and all of its officials/ authorized Agent) Of the City of Monrovia Liberia MOVANT))
VERSUS)	ACTION MOTION FOR SUMMARY) JUDGMENT)
The Ministry of Health & Social Welfare) Represented by and thru its Minister and The) Ministry of Education, represented by and thru) It's Minister and all of those working under the) scope of Authority. RESPONDENTS))

GROWING OUT OF THE CASE:

St. Luke School of Medicine) Represented by and thru its President Jerrrol) Dolphin and all of its officials/ authorized Agent) MOVANT))
VERSUS)	ACTION DAMAGES FOR WRONG)
The Ministry of Health & Social Welfare) Represented by and thru its Minister and The) Ministry of Education, represented by and thru) It's Minister and all of their principal Deputies.) And all of those working under the scope of) Authority Republic of Liberia.) DEFENDANTS))

MOVANT'S AFFIDAVIT

PERSONALLY APPEARED BEFORE ME the undersigned, a duly qualified Justice of the Peace for Monterrado County, at my office in the City of Monrovia Liberia Counsellor Ignatius N. Weah one of counsel for MOVANT in the above entitled cause of action and made Oath according to the law and facts as set forth and contained in the annexed MOVANT'S MOTION, are true and correct to the best of his knowledge and belief and as these matters of information received he verify believes them to be true and correct

SWORN AND SUBSCRIBED AND SIGNED BEFORE ME
THIS 7th DAY OF FEBRUARY A.D. 2006



JUSTICE OF THE PEACE MONT. CO. RL.


CLLR IGNATIUS N. WEAH ONE OF
COUNSEL FOR MOVANT - DE PONGME

Exhibit 28 - SLSOM REQUEST FOR CLERK'S CERTIFICATE" (Default Certificate)

REPUBLIC OF LIBERIA) IN THE CIVIL LAW COURT, SIXTH JUDICIAL CIRCUIT, MONTERRADO
MONTERRADO COUNTY) COUNTY, SITTING IN ITS SEPTEMBER TERM A. D. 2006.

BEFORE HIS HONORABLE EMERY N. PAKE, ASSIGNED CIRCUIT JUDGE

St. Luke School of Medicine
Represented by and thru its President,
Jerroll Delphic and all of its officials
/authorized Agent..... PLAINTIFF

*Filed Oct. 28, 2011
at 10:55 AM
EP Delphic
Law*

Versus

ACTION: DAMAGES FOR WRONG

The Ministry of Health & Social Welfare,
Represented by and thru its Minister and
the Ministry of Education, represented
by and thru its Minister and all of their
principal Deputies, and all of those
working under their scope of authority
..... DEFENDANT

REQUEST FOR CLERK'S CERTIFICATE

The Clerk of Court
Civil Law Court
Sixth Judicial Circuit
Monterrado County
Liberia

Honorable Clerk of Court:

You will please take due and timely notice of the above captioned case and spread upon the records of this Honorable Court that even though the Co-Defendant, Ministry of Education, had filed an amended Answer but refused, failed and neglected to file a withdrawal of previous answer and from careful perusal of the case file, there is no withdrawal therein in support of said Amended Answer.

Hence, our request for Clerk Certificate.

AND FOR REASON, THIS SHALL CONSTITUTE YOUR LEGAL AND SUFFICIENT AUTHORITY.

RESPECTFULLY SUBMITTED:
The above named PLAINTIFF
By & Thru her Legal Counsel
MEAD AND ASSOCIATES LAW OFFICES
109 KUMUHI STREET, SPOUTING TELECOM,
MONTERRADO, LIBERIA.

Lawrence
ATTORNEYS AND COUNSELLORS AT-LAW

REPUBLIC OF LIBERIA) IN THE CIVIL LAW COURT, SIXTH JUDICIAL CIRCUIT
MONTSERRADO COUNTY) MONTSERRADO COUNTY, SITTING IN ITS SEPTEMBER
TERM A. D. 2006

BEFOR HIS HONOR EMERY'S PAYE ASSIGNED CIRCUIT JUDGE

The Ministry of Health & Social)
Welfare, represented by & thru)
Its Minister **MOVANT**)

VERSUS)

ACTION: DAMAGES FOR WRONG

St. Luke School of Medicine)
Represented by and thru its President,)
Jerrold Dolphine and all of its officials)
Authorized Agents, all of the City of*)
Monrovia,)
Republic of Liberia **RESPONDENTS**)

CO-DEFENDANT NOTICE OF WITHDRAWAL


The Clerk of Court
Sixth Judicial Circuit
Montserrado County
Temple of Justice Building
Monrovia, Liberia

Dear Madam Clerk:

Upon the receipt of these our Notice of Withdrawal, you will please spread upon records of this Honorable Court that the within named Co-Defendant, Ministry of Education have withdrawn their Answer with the reservation to re-file.

BY SO DOING, this shall constitute your legal and sufficient authority

Respectfully submitted,
The within named Co-Defendant
By and thru it Legal Counsel and NEALA and
This 16th day of October, A.D. 2006



Viana J. Blama
ATTORNEY AT LAW

Exhibit 29 - SLSOM FILES MOTION FOR BARE DENIAL

REPUBLIC OF LIBERIA VS. THE CIVIL LAW COURT, SIXTH JUDICIAL CIRCUIT,
MONTSERRADO COUNTY, SITTING IN ITS SEPTEMBER
TERM A. D. 2006

BEFORE HIS HONOR EMERY S. PAYE ASSIGNED CIRCUIT JUDGE.

St. Luke School of Medicine)
Represented by and thru its President, Jerrol)
Dolphin and all of its officials' authorized Agent)
Of the City of Monrovia, Liberia MOVANT)

VERSUS

ACTION MOTION FOR BARE DENIAL

The Ministry of Health & Social Welfare)
Represented by and thru its Minister and all of its)
Principal Deputies and all of those working under)
the scope of Authority, Republic of Liberia)
RESPONDENT)

GROWING OUT OF THE CASE:

St. Luke School of Medicine)
Represented by and thru its President, Jerrol)
Dolphin and all of its officials' authorized Agent)
PLAINTIFF)

VERSUS

ACTION DAMAGES FOR WRONG

The Ministry of Health & Social Welfare,)
Represented by and thru its Minister and The)
Ministry of Education, represented by and thru)
it's Minister and all of their principal Deputies,)
And all of those working under the scope of)
Authority, Republic of Liberia,)
DEFENDANTS)

MOVANT'S MOTION

Movant, St. Luke School of Medicine, in the above entitled proceedings moves this Honorable court to rule Respondent Ministry of Health & Social Welfare to bare denial in manner and form as follow, to wit, -

1. Movant is Plaintiff in an action of Damages for Wrong, which was filed on the 15th day of September A. D. 2006 which Complaint is still pending before this Honorable court undetermined. Movant request Your Honor to take judicial notice of the case file
2. Movant says and submits that on the 18th day of October A. D. 2006, she received copy of a notice of withdrawal from the Respondent Ministry of Health & Social Welfare by and thru one of counsels for Ministry of Education who also served other documents on the same date on Movant and was duly received. Since both institutions are principal Defendants and Government Institutions. Photo copy of the notice of withdrawal from the Ministry of Health & Social Welfare is herewith attached, marked exhibit P/1 to form part of this Motion.
3. Movant contends and says that since the filing of said Notice of Withdrawal, same being over ten (10) days as required by law for Respondent Ministry of Health &

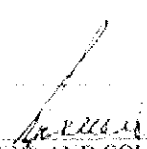
Social Welfare to file her Amended Answer but since then, she has refused, failed and neglected to file same, as such, Movant obtained a Clerk Certificate to that effect, and since then upto- date, Respondent has not filed any Amended Answer. Photo copy of the Clerk Certificate is herewith attached, marked exhibit M/ 2 to form part of this Motion.

4. Movant says that this Motion is filed in good faith and not to baffle speedy trial

WHEREFORE, and in view of the foregoing, Movant prays Your Honor to rule Respondent Ministry of Health & Social Welfare to bare denial and grant unto Movant any and all further relief as the end of justice demand

RESPECTFULLY SUBMITTED
The above named PLAINTIFF
By & thru her legal counsel
WEAHL & ASSOCIATES LAW OFFICES
169 ASHIMUN STREET, OPPOSITE TELECOM.

Dated this 25th day of
October A.D. 2011


ATTORNEYS AND COUNSELLOR-AT-LAW

\$4.00 Revenue stamp affixed
on the original copy

[Faint, illegible text, possibly a stamp or additional signature]

REPUBLIC OF LIBERIA) IN THE CIVIL LAW COURT, SIXTH JUDICIAL CIRCUIT,
 MONTSERRADO COUNTY) MONTSERRADO COUNTY SITTING IN ITS SEPTEMBER
 TERM A. D. 2006

BEFORE HIS HONOR EMERY S. PAYE, JUDGE, ASSIGNED CIRCUIT JUDGE

The Ministry of Health & Social Welfare)
 Represented by and thru its Minister)
 MOVANT)
)
 VERSUS) MOTION TO DISMISS
)
)
 St. Luke School of Medicine)
 Represented by and thru its President, Jerrall)
 Dolphin and all of its officials/ authorized Agent)
 Of the City of Monrovia, Liberia RESPONDENTS)

GROWING OUT OF THE CASE :

St. Luke School of Medicine)
 Represented by and thru its President, Jerrall)
 Dolphin and all of its officials/ authorized Agent)
 Of the City of Monrovia, Liberia PLAINTIFF)
)
 VERSUS) ACTION DAMAGES FOR WRONG
)
 The Ministry of Health & Social Welfare.)
 Represented by and thru its Minister and The)
 Ministry of Education, represented by and thru)
 It's Minister and all of their principal Deputies.)
 And all of those working under the scope of)
 Authority, Republic of Liberia.)
 DEFENDANTS)

RESPONDENT'S RESISTANCE

Respondent in the above entitled proceedings most respectfully resists, Movant's Ministry of Health & Social Welfare Motion in manner and form as follow, to wit -

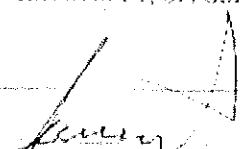
1. That as to the entire Movant's Ministry of Health & Social Welfare Motion, Respondents says same should crumble and fall, in that, under our law, a Motion must emanate from a main suit but Respondents have observed that since the withdrawal of Movant's Ministry of Health & Social Welfare Answer from the court, same been over ten (10) days as made and provided by statute, she has failed, refused and neglected to file any Amended Answer since then upto and including the filing of this Motion. Respondents request Your Honor to take judicial notice of the case file.
2. Further above, Respondents says that by virtue of Movant's Ministry of Health & Social Welfare withdrawal of her Answer, but subsequently failed to file an Amended Answer since then upto and including the filing of this Motion, same suggests that there is no Answer before Court since the Respondent's/ Plaintiff's Complaint was filed, that is, in favor of Co- Defendant's/ Movant's Ministry of Health & Social Welfare, of course, Movant is subject to bare denial, and as such, cannot raise law issues. Hence, the so- called Motion to dismiss should be dismissed.

3. Further above, Respondents says that said Motion cannot stand as stated above and in addition hereto, said Motion does not have a covering Affidavit as can be seen from the case file, as such, the entire Motion must be dismissed
4. That as to count (1), (2), (3) and (4) of Movant's Ministry of Health & Social Welfare Motion, Respondent says said counts are misleading and misrepresentation of the facts, something far from reality, and therefore, the entire Motion Should be dismissed; needless to say, count (1), (2), (3) and (4) thereof, hence, Respondents' Plaintiff maintains and reconfirms counts (1) thru (5) of her complaint and says same should not be disturbed.
5. Respondents deny all and singular the allegation contained in Movant's Ministry of Health & Social Welfare Motion, in that, count (1) thru (4) which have not been made subject of special traverse

WHEREFORE, and in view of the foregoing, Respondent pray Your Honor to dismiss Movant's Ministry of Health & Social Welfare Motion, in its entirety and rule the cost therefrom against Movant and grant unto Respondents all further relief as the end of justice demand.

RESPECTFULLY SUBMITTED
The above named PLAINTIFF
By & thru her legal counsel
WEAH & ASSOCIATES LAW OFFICES
109 ASHMUN STREET, OPPOSITE TELECOM.

Dated this 26th day of
October A D 2006


ATTORNEYS AND COUNSELLOR-AT-LAW

54 00 Revenue stamp affixed
on the original copy

Exhibit 30 - Liberia Government Defaults-Liberia Civil Law Court Issues Default Certificate to SLSOM

REPUBLIC OF LIBERIA) IN THE SIXTH JUDICIAL CIRCUIT, CIVIL LAW COURT FOR
MONTERRADO COUNTY) MONTERRADO COUNTY, SITTING IN ITS SEPTEMBER TERM,
A.D. 2006.

BEFORE HIS HONOUR: EMERY S. PAYE.....ASSIGNED CIRCUIT JUDGE

<p>IN RE: St. Luke School of Medicine, represented by and thru its President, Jerroll Dolphin and all of its officials/authorized Agent of the City of Monrovia, Liberia...PLAINTIFF</p> <p style="text-align: center;">VERSUS</p> <p>The Ministry of Health & Social welfare, re- presented by and thru its Minister and the Min- istry of Education, represented by and thru its Minister and all of their Deputies, and all of those working under the scope of authority, Re- public of LiberiaDEFENDANTS</p>	<p><u>ACTION:</u></p> <p>)</p> <p>) DAMAGES FOR</p> <p>) WRONG.</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>
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CLERK'S CERTIFICATE

AN INSPECTION OF THE CASE FILE IN THE ABOVE CAPTIONED CAUSE OF ACTION REVEALS THAT THE NOTICE OF WITHDRAWAL CARRIES THE MINISTRY OF HEALTH & SOCIAL WELFARE EXCLUSIVELY, ^{AS MOVANT,} WHILE THE AVERMENT CARRIES THE MINISTRY OF EDUCATION AS CO-DEFENDANT, UP TO AND INCLUDING THE ISSUANCE OF THIS CLERK'S CERTIFICATE.

HENCE, THIS CLERK'S CERTIFICATE.

GIVEN UNDER OUR HANDS AND SEAL OF COURT,
THIS 30TH DAY OF OCTOBER, A.D. 2006.

COURT'S SEAL:

[Signature]
Victor G. Gailor, ASST. CLERK, SIXTH JUDICIAL
CIRCUIT, CIVIL LAW COURT, MONT. CO., R. L.

ATTESTED:

Nancy Washington
Nancy Washington, Clerk, Files & Records, Civil Law Court.

Margaret Browne
Margaret Browne, Asst. Clerk, Files & Records, Civil Law Court.

Exhibit 31 - LEGISLATIVE ENACTMENT

AN ACT
TO
INCORPORATE
ST. LUKE SCHOOL OF MEDICINE (SLSOM)
OF
THE CITY OF MONROVIA
MONTERRADO COUNTY
REPUBLIC OF LIBERIA
AND TO GRANT IT A CHARTER
BY
THE NATIONAL LEGISLATURE
OF THE
REPUBLIC OF LIBERIA
APPROVED APRIL 24, 2003
PUBLISHED BY AUTHORITY
MINISTRY OF FOREIGN AFFAIRS
August 8, 2003
WELCOME TO ST. LUKE
SCHOOL OF MEDICINE (SLSOM)

AN ACT TO INCORPORATE
ST. LUKE SCHOOL OF MEDICINE (SLSOM)

OF
THE CITY OF MONROVIA
MONTERRADO COUNTY
REPUBLIC OF LIBERIA

AND TO GRANT (SLSOM) A CHARTER
IT IS ENACTED BY THE NATIONAL LEGISLATURE
OF THE
REPUBLIC OF LIBERIA, IN LEGISLATURE ASSEMBLED

ARTICLE 1

SECTION 1:

ST LUKE SCHOOL OF MEDICINE WAS ESTABLISHED AUGUST 1, 2006, AND INCORPORATED AUGUST 22nd, 2001 IN THE CITY OF MONROVIA, MONTERRADO COUNTY. REPUBLIC OF LIBERIA, IS HEREBY ESTABLISHED IN THE NAME OF ST. LUKE SCHOOL OF MEDICINE INCORPORATED (SLSOM), BY AND THROUGH ITS FOUNDERS, DR. JERROLL DOLPHIN, PRESIDENT, HON. FRANK E. TEAH JR., VICE PRESIDENT, AND DR. MEIMEI DUKULY, DEAN OF ACADEMIC AFFAIRS SAID SCHOOL IS HEREBY FURTHER GRANTED THIS CHAPTER WHICH ENDOWS IT WITH ALL THE RIGHTS, PRIVILEGES AND BENEFITS EXISTING IN SIMILAR INSTITUTIONS OF HIGHER LEARNING WITHIN THIS REPUBLIC, AND SHALL HENCEFORTH BE KNOWN BY THE NAME AND TITLE "ST. LUKE SCHOOL OF MEDICINE"

SECTION 2: LEGAL STATUS

THE ST LUKE SCHOOL OF MEDICINE (SLSOM) IS HEREBY MADE A LEGAL AND CORPORATE ENTITY WITH PERPETUAL SUCCESSION, AND SHALL HAVE THE AUTHORITY TO CONTACT, SUE AND BE SUED, PLEAD AND BE IMPEALED IN ANY COURT OF COMPETENT JURISDICTION WITHIN THE REPUBLIC, TO PURCHASE OR OTHERWISE ACQUIRE AND HOLD PROPERTY, REAL AND MIXED UP TO THE VALUE OF ONE HUNDRED AND FIFTY MILLION UNITED STATES DOLLARS (US\$150,000,000), THE SAID ST LUKE SCHOOL OF MEDICINE (SLSOM) SHALL BE PERPETUALLY MAINTAINED IN THE REPUBLIC FOR MEDICAL EDUCATION OF THE PEOPLE OF THIS NATION, PEOPLE OF THE OTHER COUNTRIES AND FOR WHO MAY HAVE THE CAPACITY TO SEEK MEDICAL EDUCATION.

ARTICLE III

TRUSTEE BOARD

SECTION I

The governance of St. Luke School of medicine (SLSOM) shall be vested in the trustee board, which is hereby made a corporate body under the name and style of the trustees of St. Luke School of Medicine (SLSOM) with perpetual succession of members to be chosen and appointed as herein provided in this charter.

SECTION II

COMPOSITION OF THE BOARD

The board shall be composed of members appointed by the founders of St. Luke School of Medicine (SLSOM). The members appointed shall be seven(7) and they shall serve for the period of four(4) years. The minister of Health of the Republic of Liberia shall serve as pro-vice.

SECTION III

QUORUM

A quorum shall consist of five(5) Board Members, including the Chairman.

SECTION IV

POWERS AND DUTIES OF THE TRUSTEES BOARD

The Trustees Board of St. Luke School of Medicine(SLSOM) shall exercise the following powers and perform the following duties in accordance with the objectives of St. Luke School of Medicine(SLSOM).

- to make and use a common seal and to alter same at its pleasure
- To provide a faculty, establish procedures and standard control regulations and control for the functioning of St. Luke School of Medicine(SLSOM). To grant degrees appropriate for St. Luke School of Medicine

To take gift, grant, devise purchase or otherwise acquire real property and hold same or to sell, let, invest and re-vest or in any lawful manner manage such property for the benefit of St. Luke School of Medicine(SLSOM). Income therefrom to be applied to the endowment and support of the ST. LUKE School Of Medicine (SLSOM) and in such manner as shall most effectively promote the interest of the St. Luke school of medicine (SLSOM), the growth of the St. Luke School of Medicine (SLSOM) and improvement of its faculty and student body.

ARTICLE II

MEDICAL EDUCATION MISSION STATEMENT

SECTION I

St. Luke School of Medicine has two major goals for its graduates: that they broadly and liberally educated men and women, and that they view medicine as a socially responsible human service profession.

St. Luke School of Medicine seeks students, who regard medicine as a noble profession rather than a trade to be learned, as a humanitarian pursuit, as well as a scholarly discipline, and as a unique lifetime experience. St. Luke School of Medicine graduates must be well-rounded, scientifically grounded, but also capable of approaching problems from a variety of perspectives, drawing upon the method of analysis of the humanist, the social scientist and the behavioral scientist. St. Luke School of Medicine intend that our students follow in the tradition of medicine, placing the welfare of their patients and society above self-interest. St. Luke School of Medicine teaches its students to prepare to meet the technologic innovations of the present and future.

St. Luke School of Medicine ensures that it's M.D. recipients are exposed to a wide, sensitizing view of the human condition from both historical and contemporary perspectives. The result is a "liberal" medical supported by the entire faculty of a great instruction which does honor to the great disciple from the Medical School derives its name. This is our education mission.

To these aims we do strive.
June, 1998

SECTION 1.

The Board of Trustees of St. Luke School of Medicine may acquire public lands in the various counties and districts of the Republic of Liberia when necessary, as land grants, from the government of the Republic of Liberia, free of all charges and assessments for the furtherance of the objectives of the St. Luke School of Medicine (SLSOM) and its various departments.

ARTICLE IV

DUTIES OF THE PRESIDENT

SECTION 1

1. The president of the St. Luke School of Medicine(SLSOM) shall be nominated by the Founders and be confirmed by the Board of Trustees.

2. The president shall, in consultation with and upon the advice of the Founder, have authority. The affairs of the St. Luke School of Medicine(SLSOM) within the framework of the charter, by-laws, regulations, and establish policies of St. Luke School of Medicine(SLSOM). He shall submit to the board of Trustees through the Founders, and Annual Report covering the activities of the St. Luke School of Medicine(SLSOM).

3. The president of the St. Luke School of Medicine(SLSOM), after consultation with and upon prior approval of the Founders, shall nominate to the Board of Trustees such members of the faculty as may be required to carry out the work of the St. Luke School of Medicine, Vice President, Deans and/or Directors of the various departments and other members of the Faculty for their consideration and approval.

4. The President of the St. Luke School of Medicine, in consultation with the Founders, shall prepare and submit an Annual Budget covering the expenditure of all institutional operations, to the Board of Trustees for their consideration and approval.

To enter into and execute and contracts and agreement, to mortgage real and personal property and, in guarantee thereof all deeds, bills of sale or other instruments in writing sealed with the common seal of the Board of trustees of the St. Luke School of medicine and signed by its order shall be considered in law as the act of the said Board of Trustees, when made in its corporate name.

To sue and be sued, to plead and be impleaded against in all action and to prosecute the same as necessary to final judgment and executive in the name of the St. Luke School of Medicine (SLSOM).

To approve the appointment of the Deans and Directors of various departments and other members of the faculty and staff upon nomination by the President of the St. Luke School of Medicine (SLSOM).

To make such by-laws, rules and regulations as may be necessary for itself and for the efficient governance of the St. Luke School of Medicine.

To confer the usual academic honor and degrees granted to similar institutions upon recommendation of the faculty through the President of St. Luke School of Medicine (SLSOM) and to confer honorary degrees upon the recommendation of the President of the St. Luke School of Medicine (SLSOM) and approve by the Board of Trustees.

To do all other things laid within its by-laws and constitutions not inconsistent with this Charter and the Constitutions of the Republic of Liberia and to do all other acts necessary and expedient for the administration of the affairs and attainment of the purposes of the St. Luke School of Medicine(SLSOM) or similar non-profit making organizations.

To elect its officers and members and to establish its standing and special committee.

To approve the annual budget of the St. Luke School of Medicine(SLSOM) as prepared and submitted by the President of St. Luke School of Medicine.

ARTICLE VII

COMPOSITION OF THE ST. LUKE SCHOOL OF MEDICINE

The following Divisions and Departments shall constitute the instructional program of St. Luke School of Medicine

- a) Academic Affairs (Basic Science and Clinical Science
- b) Administrative Affairs (Management and Control)
- c) Financial Affairs (Fund Raising)
- d) Research and Development (General/Community Health)

ARTICLE VIII

EXEMPTION FROM TAXATION

All properties acquired by and given or donated to the St. Luke School of Medicine including merchandise, furniture, fixtures, building materials and equipments of all kind, as well as all kinds of books and literature and real estate purchased by the institution or donated to it, shall be tax exempt at all times.

ARTICLE IX

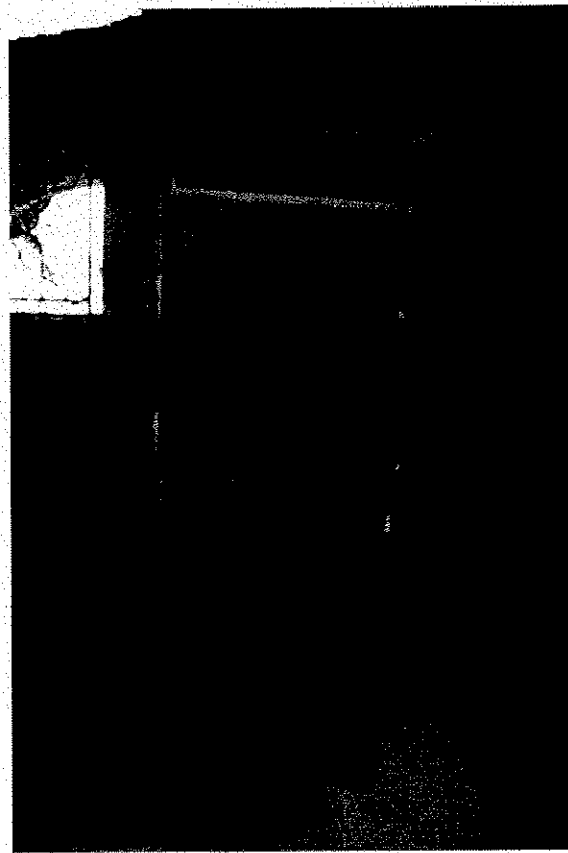
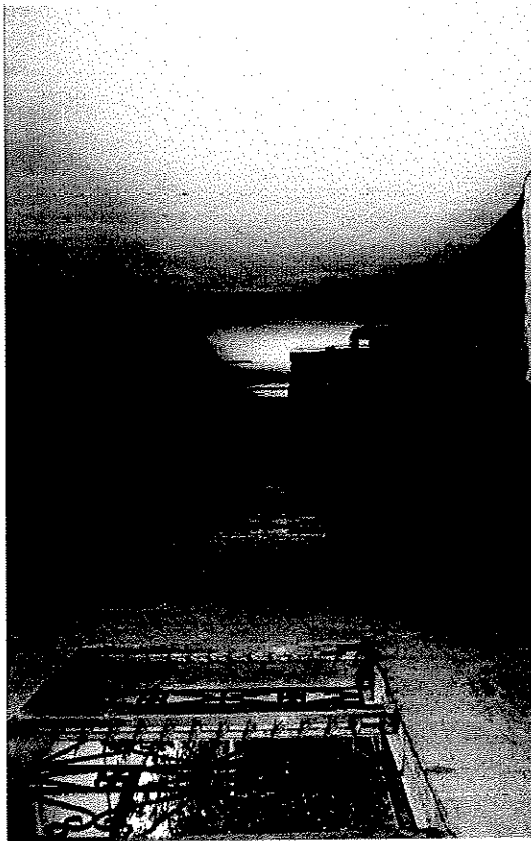
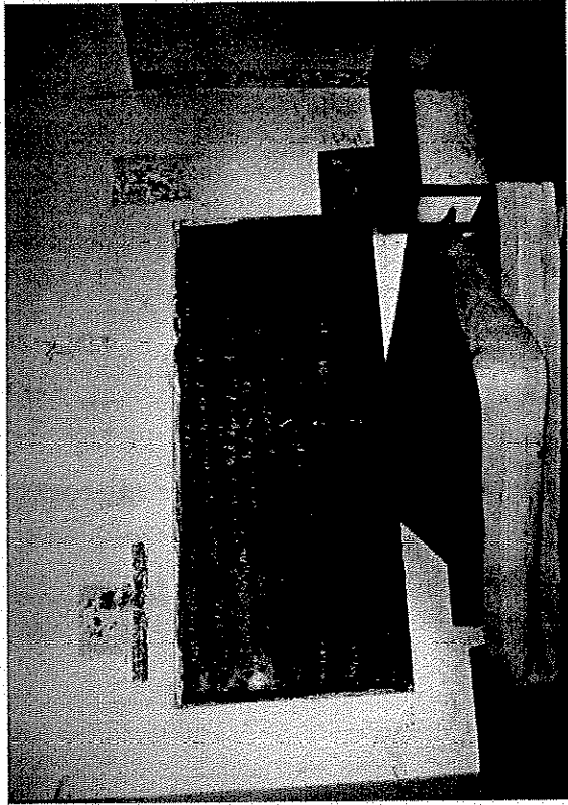
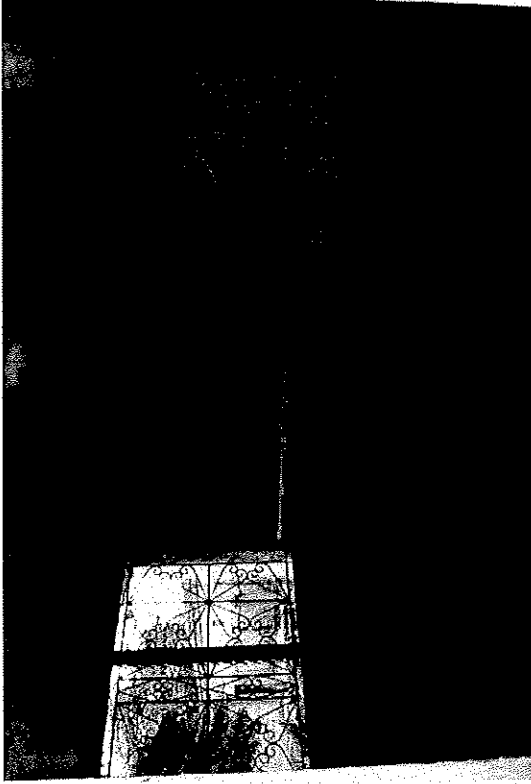
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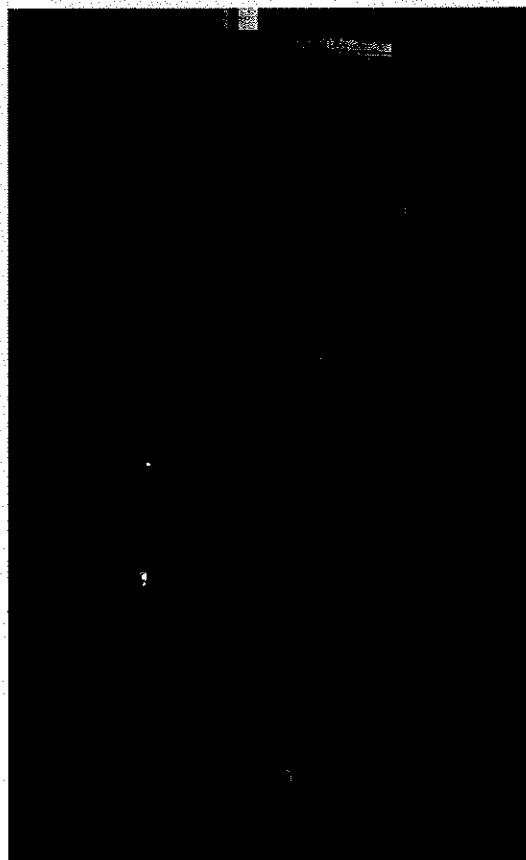
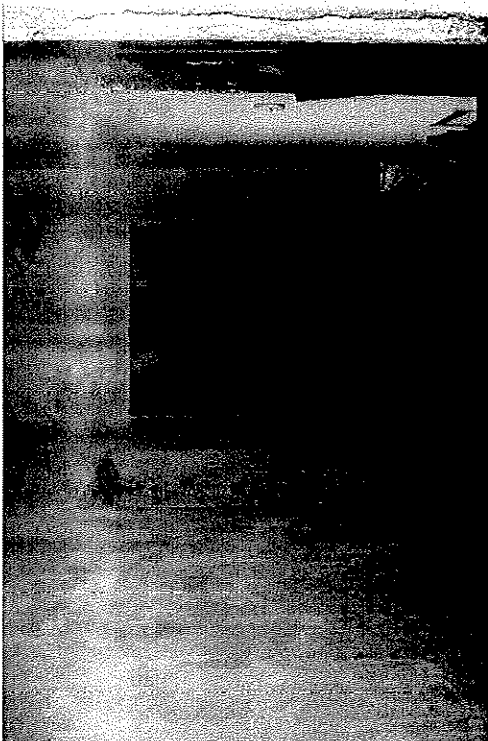
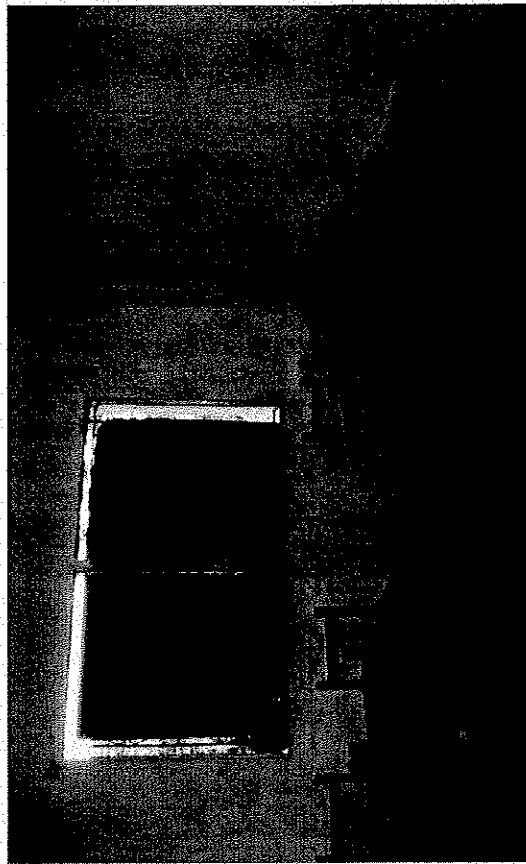
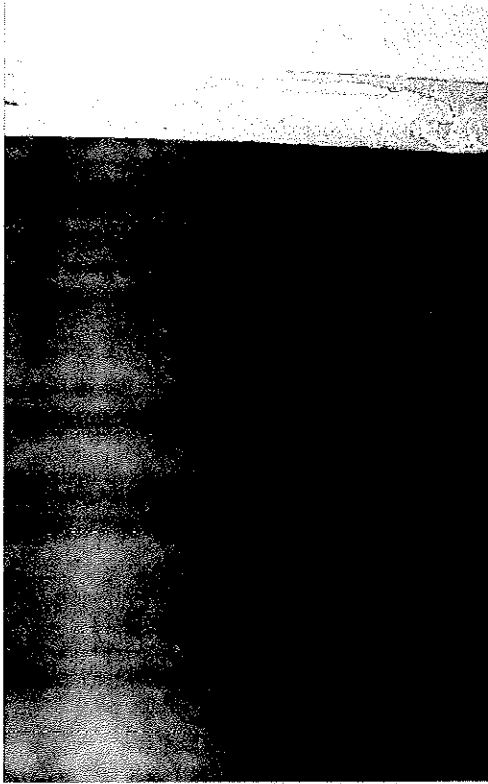
SECTION

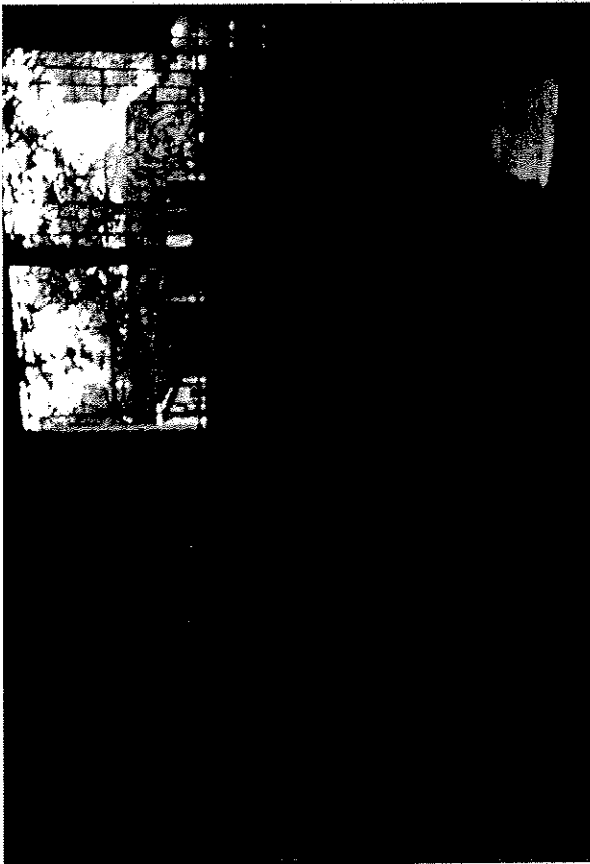
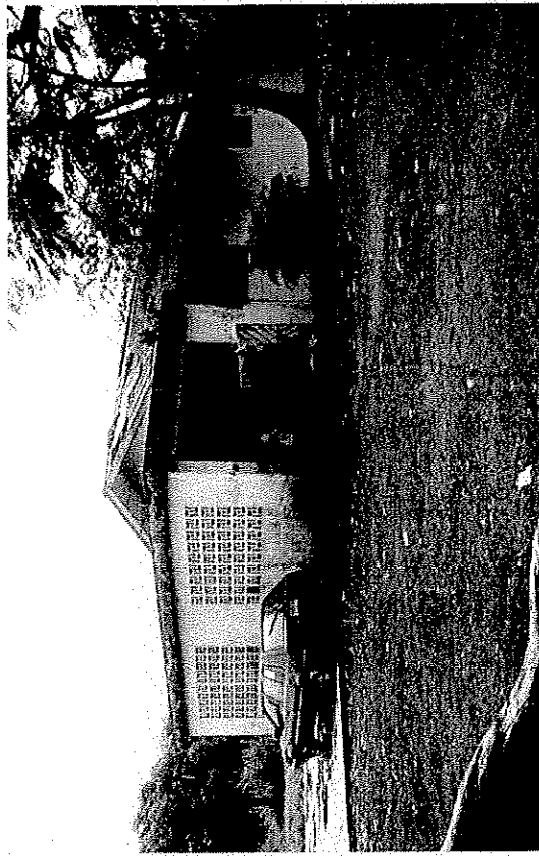
- 1. This Charter may be amended by the Legislature of the Republic of Liberia upon application to them by and through the Founder of the St. Luke School of Medicine (SLSOM), passed by a two-third vote of the said Board of Trustees during a regular meeting of the Board of Trustees.
- 2. If any provision of this Charter conflicts with any provision of the Constitution of Liberia then said Charter provision shall be declared null and void and be unenforceable without impairing the validity of the remaining provisions.
- 3. This Act shall take effect immediately upon publication in hand bills.

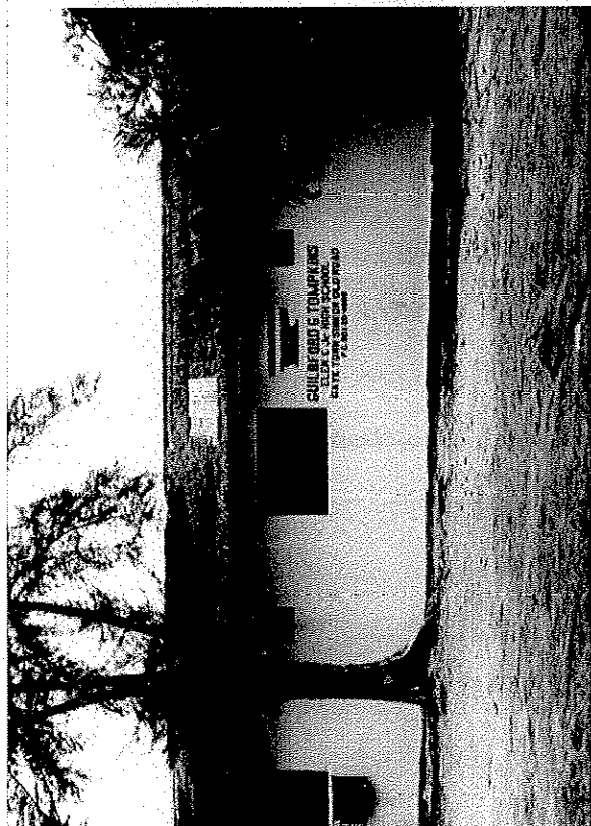
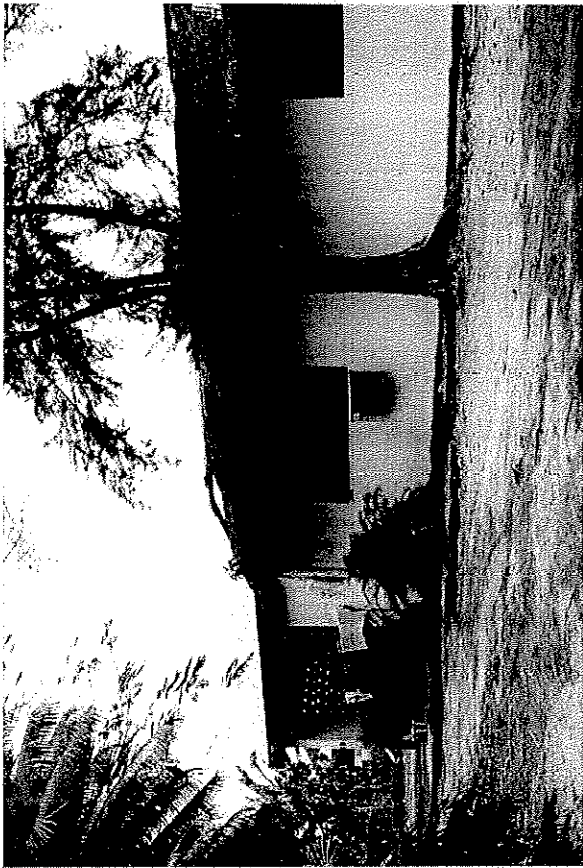
Any Law To The Contrary Notwithstanding

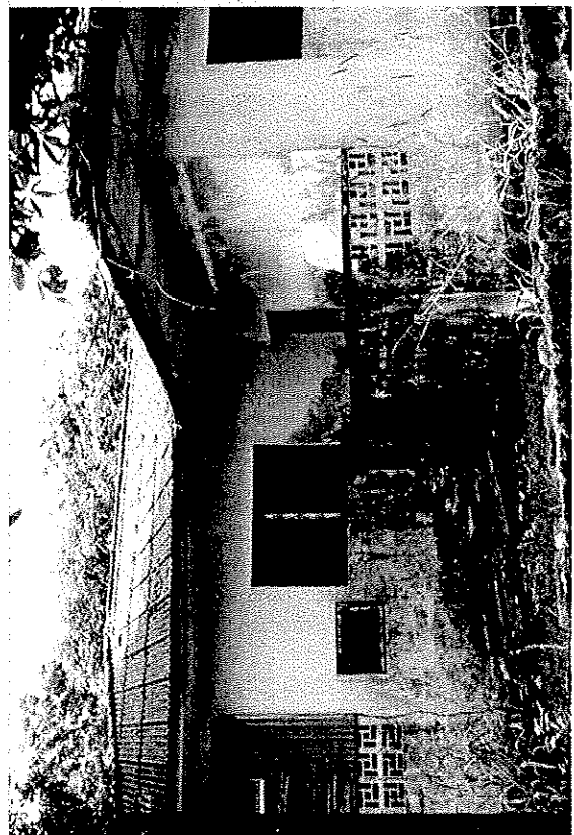
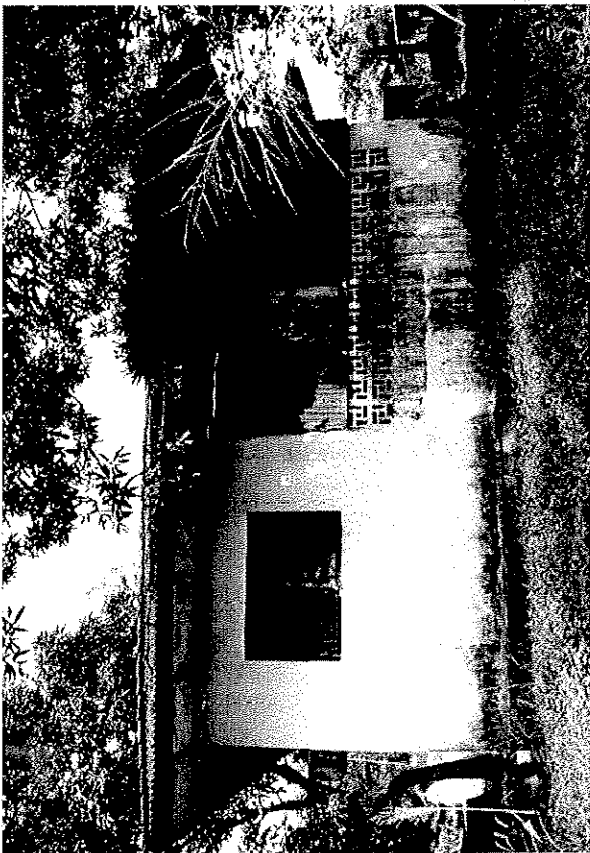
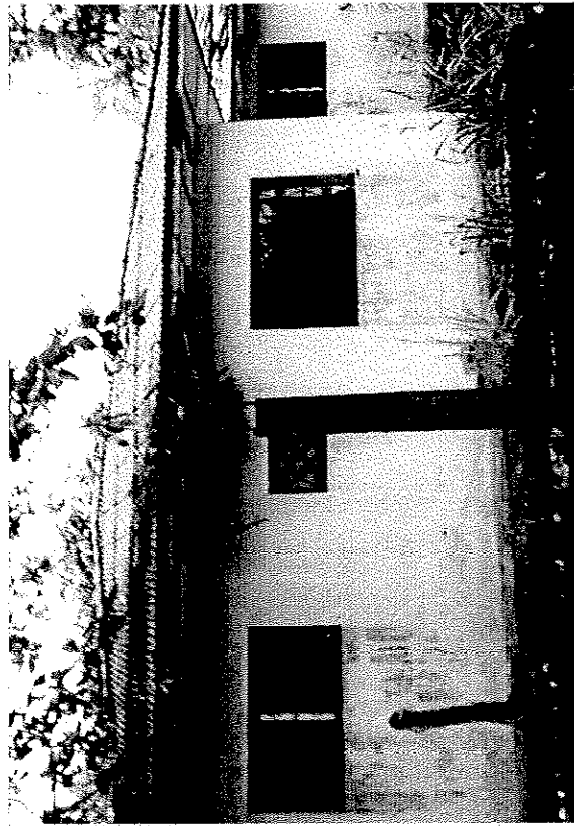
Exhibit 32 - Pictures of the SLSOM Gaye Town Campus before Renovation, November 2004











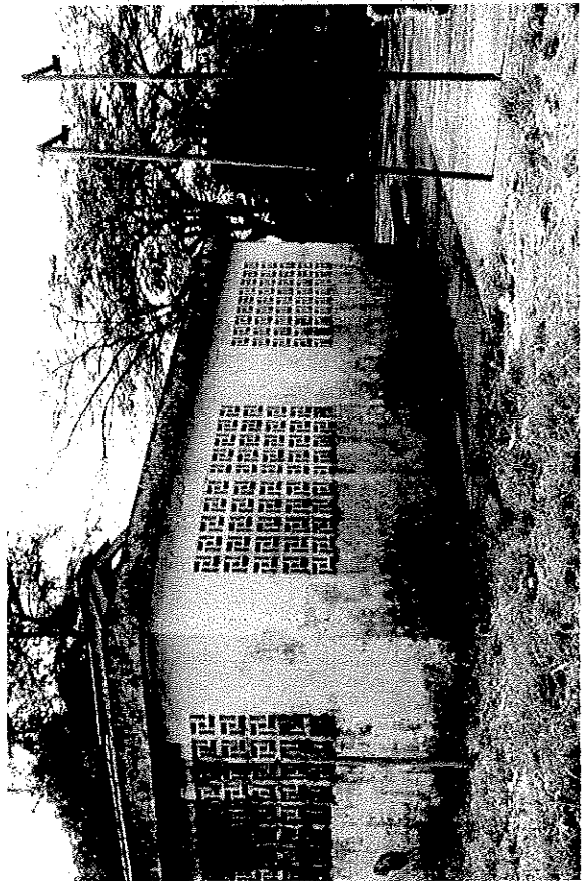
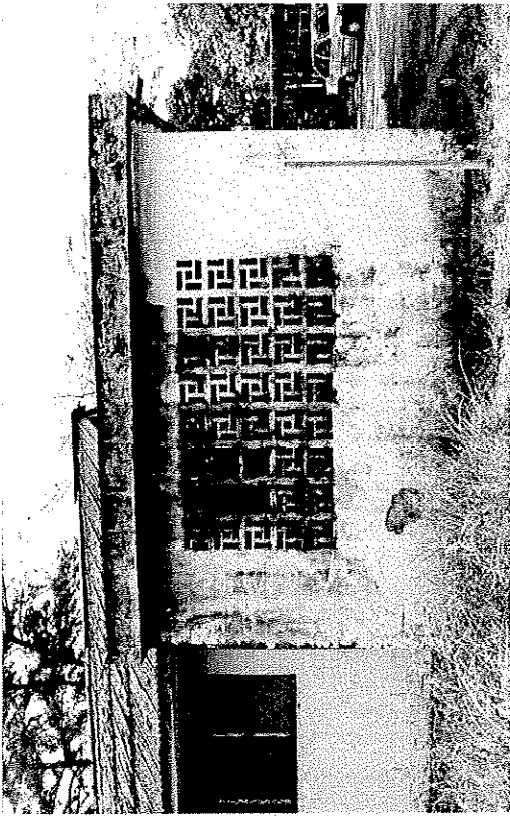
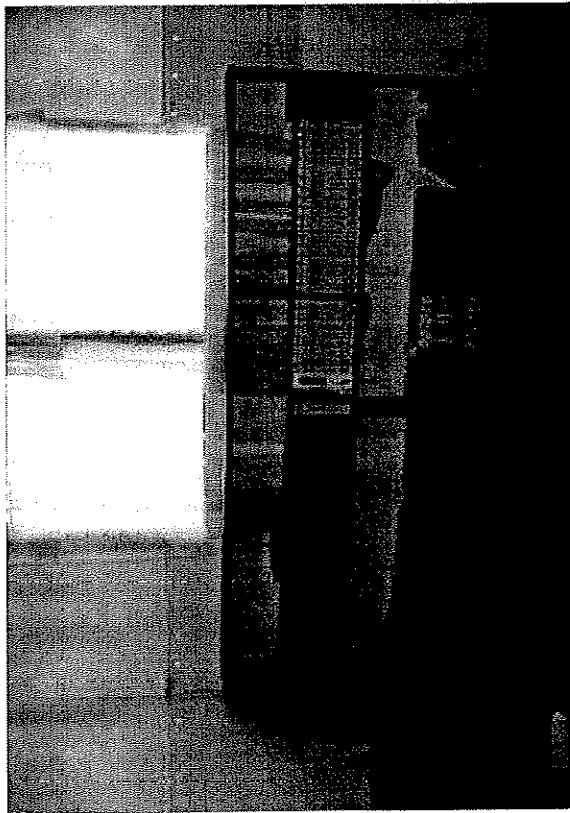
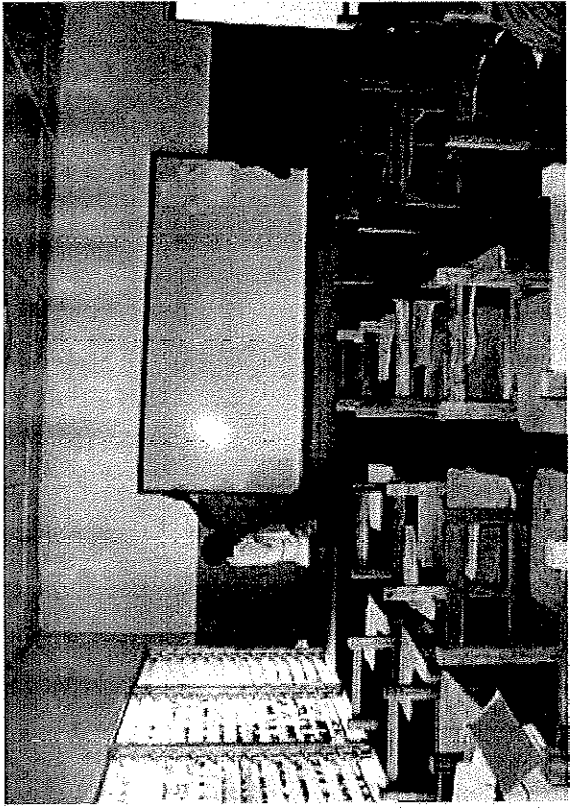
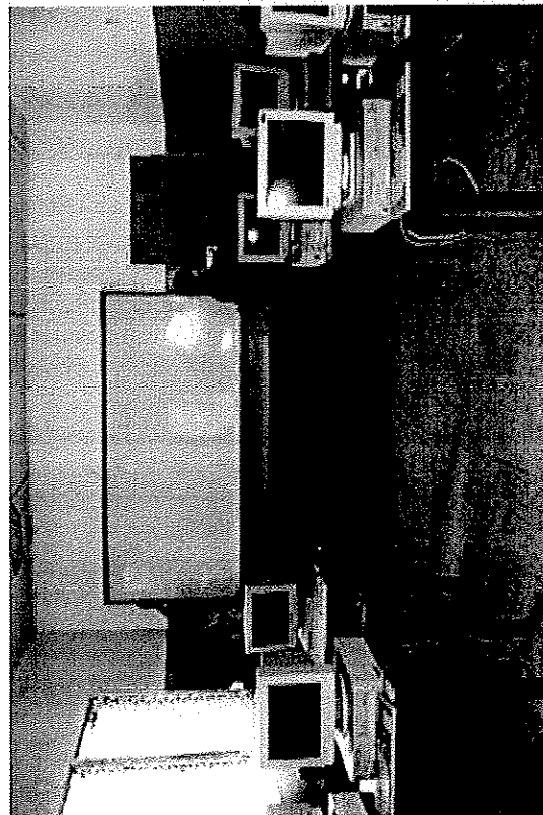
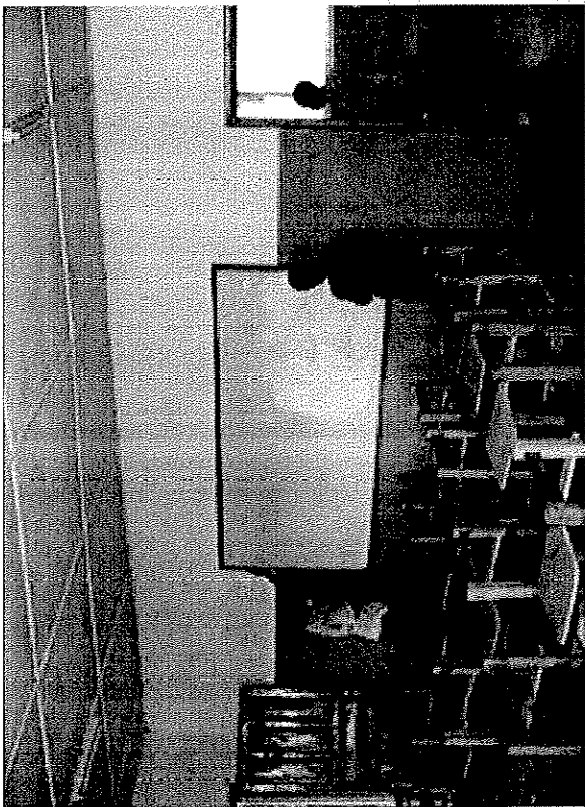
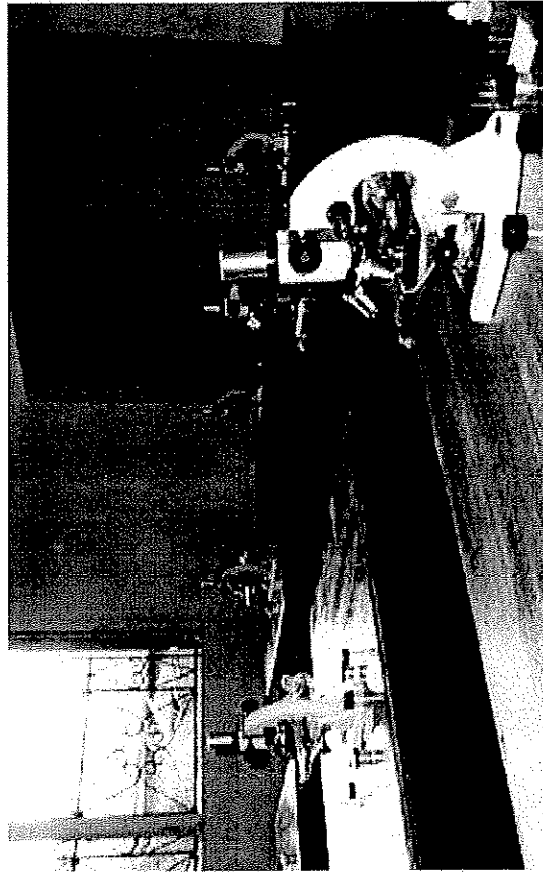
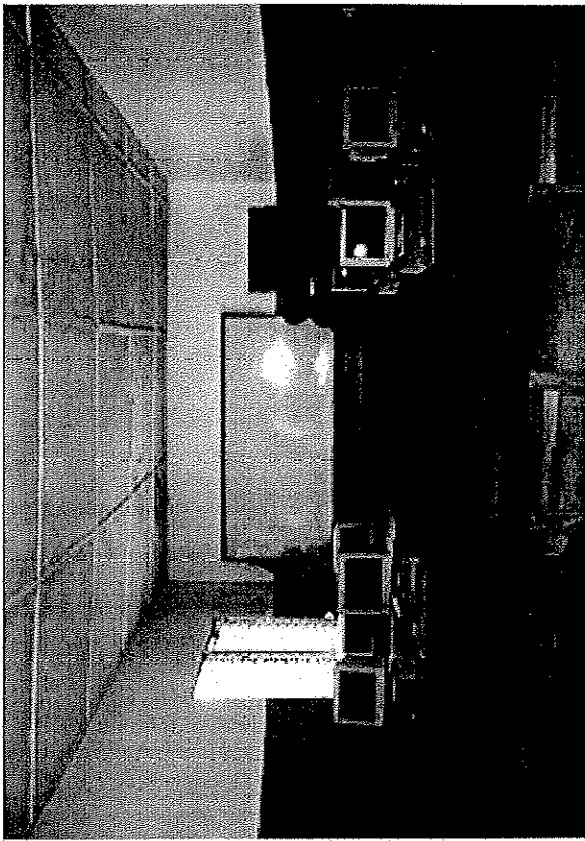
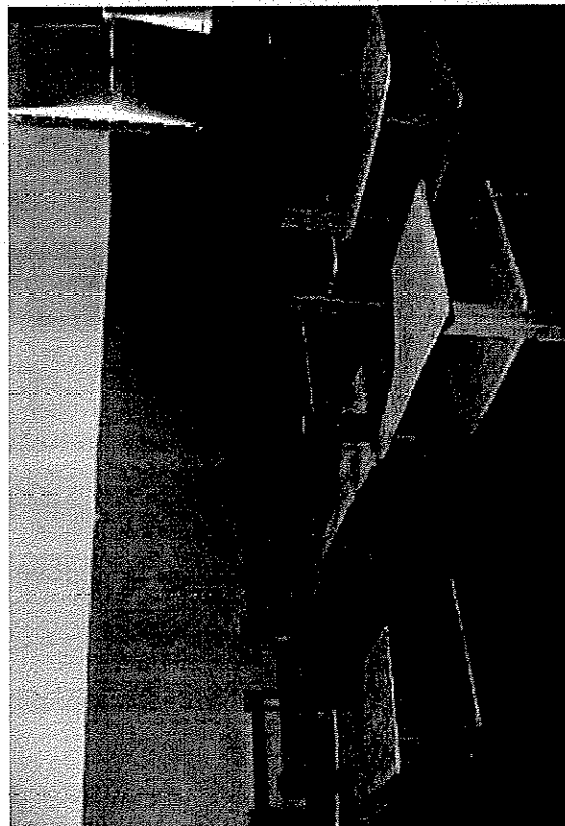
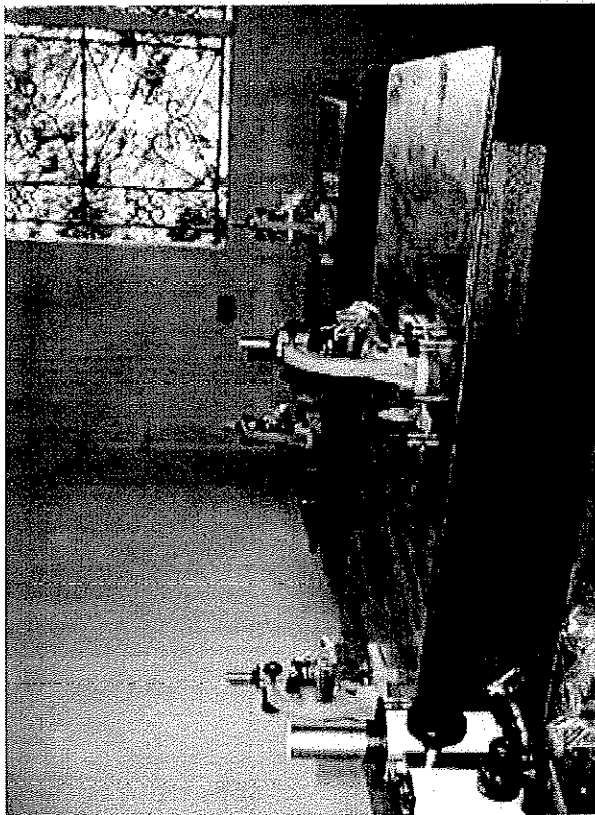
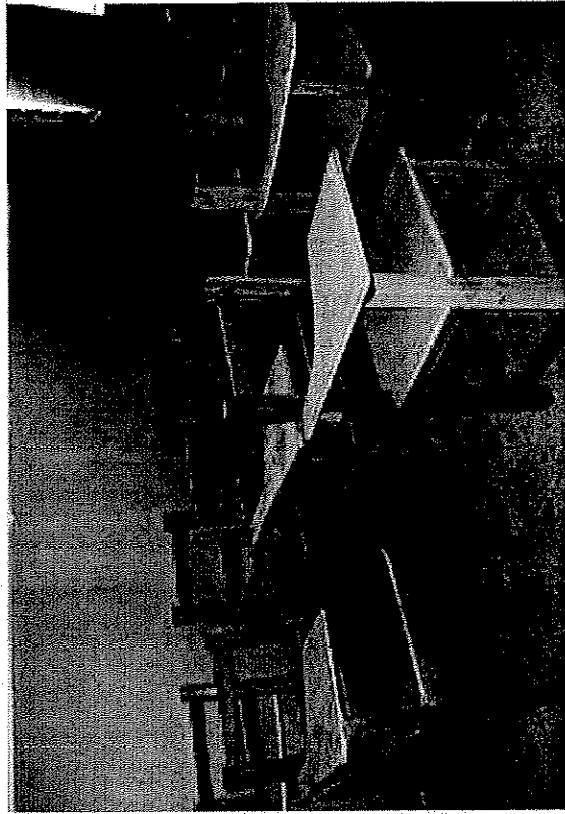
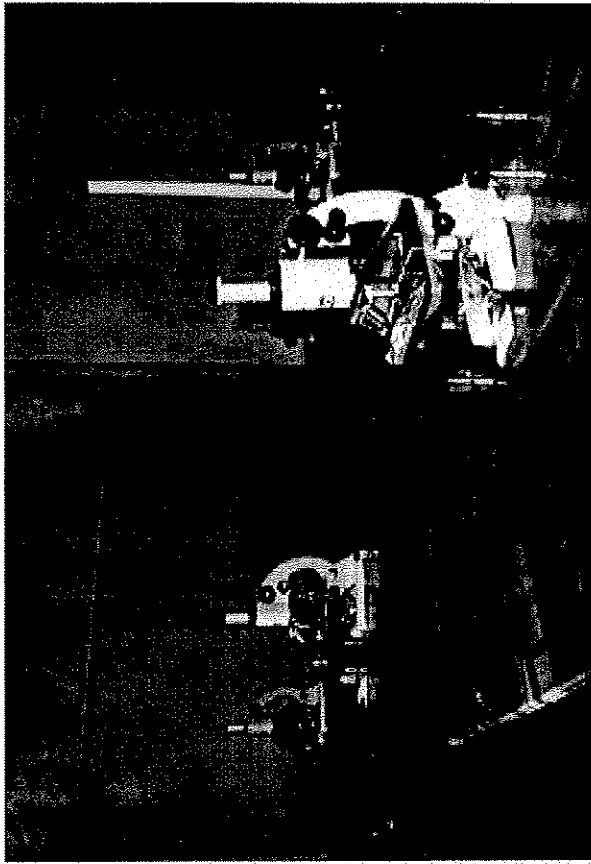


Exhibit 33 - Pictures of SLSOM Gaye Town Campus after Renovation, Circa March 2005







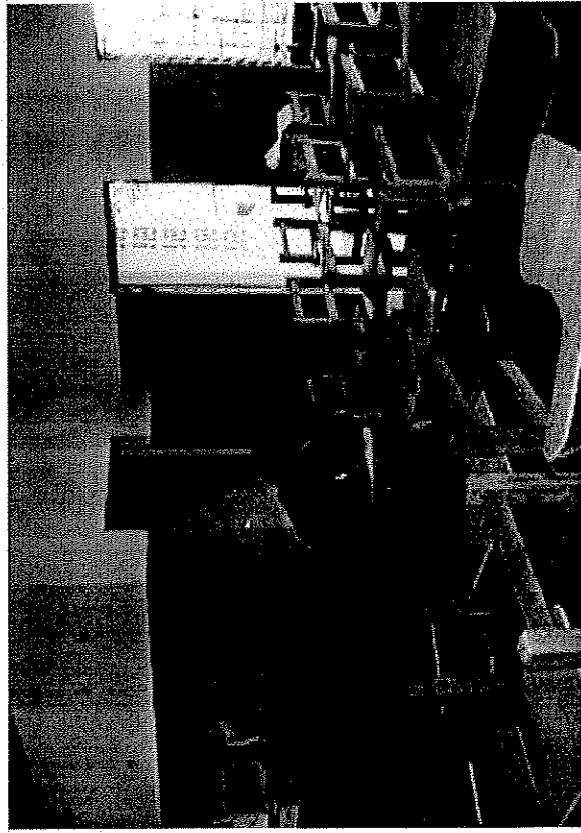
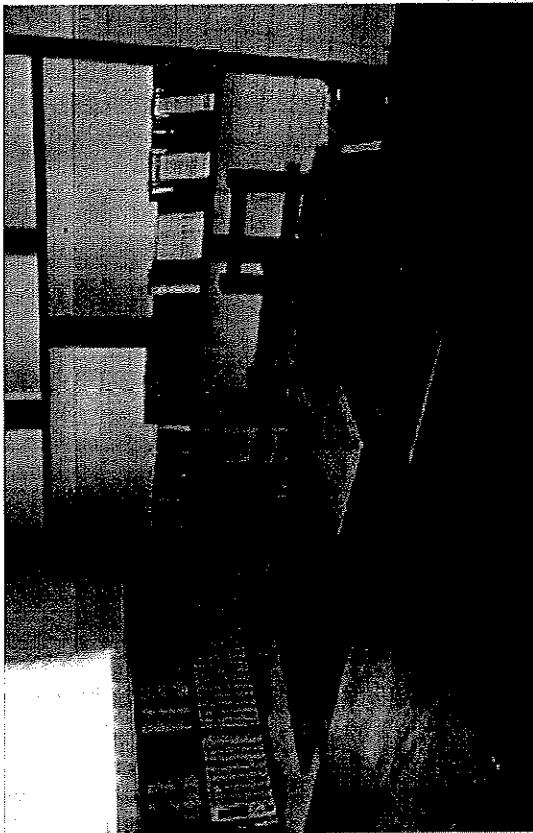
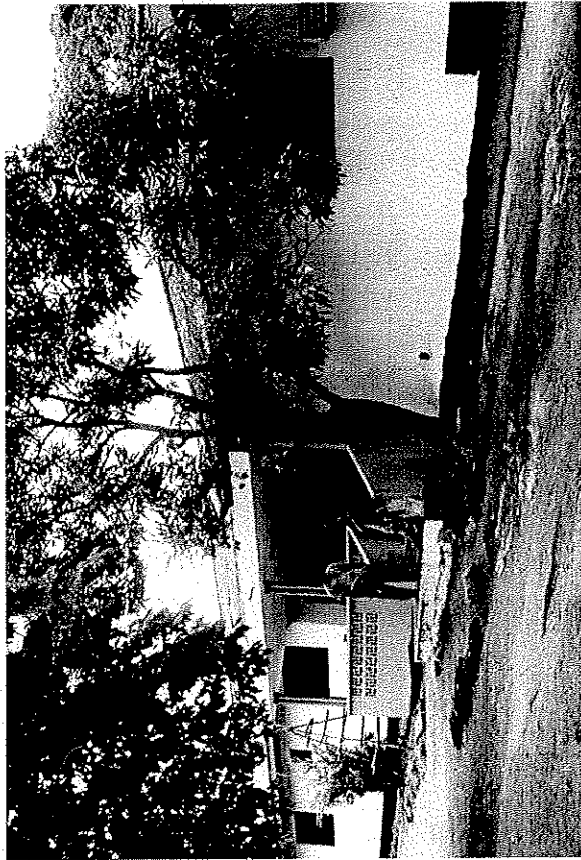
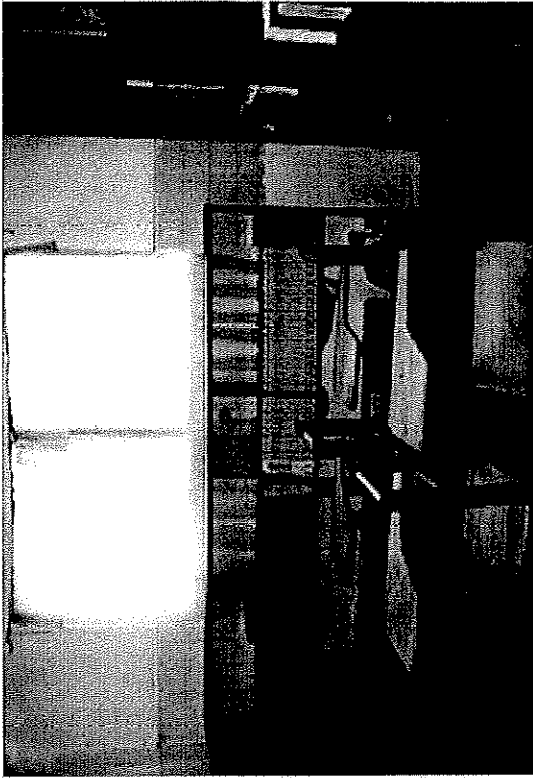


Exhibit 34 - Partial Transcript of Ministry of Health Letter to India Consulate General

March 16, 2005

Consul General of the Republic of India

Dear Consulate:

We are in receipt of your letter dated This is our answer to the question posed.

St. Luke Medical College does not exist; however, St. Luke School of Medicine does exist.

St. Luke School of Medicine filed for a temporary permit to operate in 2001. St. Luke School of Medicine was granted a temporary permit to operate a University from the Ministry of Education, National Commission on Higher Education. St Luke School of Medicine also received an enactment from the Liberian legislature to operate a university. The school is also recognized by the World Health Organization.

Presently, St. Luke is recognized by the government of Liberia. Moreover, St. Luke School of Medicine is going through the process of reaccreditation. The National Commission on Higher Education has issued an attestation to the school. St. Luke School of Medicine is now waiting to receive a new permit to operate.

I thank you for your inquiry.

Sincerely yours,

Exhibit 35 – SLSOM Invitation to the LMB for Inspection of its Campus

March 8, 2005

Horatius Brown, M.D.
Chairman, Liberian Medical Board
Ministry of Health and Social Welfare
Capital Bypass
Monrovia, Liberia

INSPECTION INVITATION

Dear Dr. Brown,

On behalf of the Board of Trustees and administrators of St. Luke School of Medicine (SLSOM), I invite the Liberian Medical Board to inspect the SLSOM campus in Monrovia for accreditation. This campus is located at Gaytown, Sinkor, Old Road, behind the University of Liberia Professor's Housing Quarters.

SLSOM will limit the number of students on the campus to 50 until the second half of the building, which has four (4) more classrooms, is renovated. At which time, SLSOM will ask the Liberian Medical Board to allow it to increase its enrollment to 100 students. The expected date of completion of the final phase of renovation is in April 2005.

SLSOM will continue to build its modern library and computer facilities. SLSOM has over 500 new volumes of medical and nursing books, CD-ROMS, and software. SLSOM has eight (8) computers, ten (10) new 1500X microscopes, with stains, solvents, solutions, and other equipment. SLSOM's CD-ROM collection includes some 22 approved courses of interactive learning at the university and graduate levels. SLSOM expects to have approximately 700 new volumes of medical and nursing literature by April 2005.

St. Luke School of Medicine wishes to be a working partner in higher education for the advancement of Liberia. It is with great pleasure that the administrators of the School of Medicine of St. Luke School of Medicine invite the Liberian Medical Board to inspect its facilities at its first opportunity to do so.

Detailed arrangements for this inspection can be made with myself at 05-670125, or Ms. Grace Dorbor, B.Sc., R.N., the Nursing Program Manager. Her telephone number is 540318.

This invitation is duly submitted and ratified, signified by the St. Luke School of Medicine insignia, below.



Jerroll B. R. Dolphin, M.D., M.Sc.
President, St. Luke School of Medicine

Exhibit 36 – SLSOM Curriculum

SLSOM Online Curriculum

The St. Luke School of Medicine online curriculum began in April 2001 by Dr. Jerroll Dolphin from his own medical school notes. Its creation was a solution to the idea that medical students in both basic science and clinical clerkship may need supplemental instruction in state of the art medicine and science. The first courses online were the 1st Trimester courses: Human Anatomy, Physiology, Histology, Embryology, and Biostatistics. Over the next year and a half, the 2nd, 3rd, and 4th Trimester courses were added. At that time, the end of 2002, St. Luke School of Medicine was the first medical school worldwide with a curriculum completely online.

Many organizations objected to learning medicine online, saying that medicine cannot and should not be taught online. St. Luke School of Medicine's philosophy supporting the development and use of online medical curriculum is that:

1. SLSOM's medical students are intelligent and bright;
2. An online curriculum supplements classroom instruction;
3. An online curriculum reduces the time and effort of student note taking;
4. An online curriculum helps the medical student focus on learning in class and increases memory retention;
5. An online curriculum lesson can be repeated as many times as necessary to assist the medical student's learning;
6. Online demonstrations, laboratory experiments, and interactive learning increase the medical students' learning efficiency;
7. Online information is ever increasing and developing as well as being easily assessable;
8. The need for classroom instruction is reduced;
9. The number of professors required to teach is reduce;
10. Laboratory sessions can be more intensive in training when routine fundamental experiments can be performed or simulated online, repeatedly.

Since St. Luke School of Medicine's posted its online curriculum in 2001, many medical schools have developed an online curriculum such as the University of California, University of Utah, Harvard University, Stanford University, Duke University, the University of Glasgow, and many others. However, they refer their online curriculum as 'independent study'.

Many states, medical licensing agencies, etc., in many countries have stated that they will not accept or disqualify applications for licensing if doctors have received any training as

distance learning or online. Those 'name' medical schools make classroom attendance "optional" and not a requirement for learning. However, the licensing agencies the other way when it comes to licensing graduates of 'name' medical schools. The trend in modern medical education, however, is not to reduce online instruction, but to increase the number of courses available for online instruction and improve its quality and content.

St. Luke School of Medicine's examinations are also online. In the beginning, the examinations were written in Microsoft Word. They were 'paper' exams. The medical student would take the examination and send it to SLSOM's office for grading. With experience, SLSOM MS Word examinations became 'paperless' and the medical student would return the examinations to SLSOM's Exam Coordinator by e-mail for grading. In 2004, St. Luke School of Medicine started converting all of its examinations to completely online system where each exam is taken online. When the medical student finishes the examination, it is automatically scored, graded and the results are sent to the SLSOM Exam Coordinator. The Exam Coordinator would only enter the score for the examination in the medical student's transcripts.

St. Luke School of Medicine has 104 automated examinations in virtually every course. These standardized exams assure that St. Luke School of Medicine medical students are adequately trained to its standard of learning. SLSOM has an additional 160 other graded quizzes, essays, and term projects for its medical students to complete in basic science, many of which are also automatically graded.

As a consequence of SLSOM's instructional and examination methods, no St. Luke School of Medicine medical can be 'black-balled' or mistreated by an instructor regarding grading. Instructors only have the option of changing examination content, with departmental approval and the approval of SLSOM's Educational Coordinator. A SLSOM instructor, generally, only grades essays, and never by himself. Essays require two reviewers for grading. This assures each SLSOM medical student of fair assessments.

A St. Luke School of Medicine transcript for its medical student is only based on the medical students grade, and likewise, honors and graduation are only determined by his academic achievement.

St. Luke School of Medicine only accepts advance students into its Independent Studies Program. To be admitted into the Independent Studies Program, an applicant must have a graduate degree, M.Sc or PhD, in a medically related field or a Bsc and at least 10 years experience as a medical professional.

St. Luke School of Medicine's students entering clinical clerkships have been said to be amongst the 'best trained' medical students at hospitals. Many SLSOM students have letters from their proctors who have stated that they were the "best" medical student they have ever had the opportunity to train.

Medicine Curriculum - Basic Science

BASIC SCIENCES

The first four trimesters are called the basic sciences; each trimester is approximately 16 weeks. The basic science curriculum provides the scientific basis for medical understanding, diagnosis, and treatment. It emphasizes the principles and mechanisms of health, disease and modes of therapy. As stated by the USMLE, St. Luke's goal as a medical school is to ensure mastery of not only the basic medical sciences undergirding the safe practice of medicine, but to also present the scientific principles required for maintenance through lifelong learning. St. Luke's curriculum for basic science is centered on the Content Description for USMLE Step 1. All Students will provided with our written basic science curriculum, as well as the Instructors. All lectures, examinations, homework, and the final examinations emphasize the requirements of the content descriptions of the USMLE Step 1. The curriculum is revised annually to reflect the latest developments in medical science and to match the requirements for the USMLE Step 1.

Basic science specialists will teach the first two trimesters. Doctors will teach the second two trimesters of basic sciences primary from the Liberia and United States. Some courses will require laboratory work as well as lecture attendance Computeraided learning is also provided for most subjects.

Basic Science Courses - Year 1

TRIMESTER 1 (540 hours)

Human Anatomy (200 hours)
Human Neuroanatomy (80 hours)
Histology & Embryology (80 hours)
Human Physiology (160 hours)
Biostatistics & Medical Writing (40 hours) - PH1
Ethics & Legal Medicine (20 hours)

TRIMESTER 2 (540 hours)

Medical Biochemistry (160 hours)
Medical Genetics (60 hours)
Microbiology and Immunology (100 hours)
Parasitology & Tropical Medicine (80 hours)
Public Health Policy & Practice (40 hours) - PH2
Nutrition (40 hours)
General Pathology (100 hours)

Basic Science Courses - Year 2

TRIMESTER 3 (580 hours)

Systemic Pathology 1 (100 hours)
Pharmacology (160 hours)
Behavioral Science (120 hours)
Child/Drug Abuse/Human Sexuality (40 hours)
Occupational and Rehabilitation (40 hours)
Community Medicine (20) - PH3
Molecular Biology (60 hours)

TRIMESTER 4 (640 hours)

Systemic Pathology 2 (160 hours)
Epidemiology & Preventive Medicine (80 hours)
Physical Diagnosis (80 hrs)
Medical Diagnosis (40 hrs)
Intro to Patient Care & Treatment (120 hours)
Intro to Clinical Medicine (80 hours)
USMLE Review (80 hours)

Preparation for the Basic Science Comprehensive Examination as well as the USMLE Part 1, Seminars will be held routinely throughout the Basic Science period at minimal cost to students, if any. All basic science graduates are required to take the USMLE Step I or its equivalent (as defined in each student's country of origin), or St. Luke School of Medicine's Comprehensive Basic Science Examination.

Continuation into clerkship (clinical rotations), however, is not dependent on passing USMLE Part I, however, all students must pass the St. Luke Basic Science Comprehensive Examination with a score of 75% or higher. The Basic Science comprehensive examination is a one-day, 400-question examination, given in four parts. Each student is allowed 150 minutes to complete each part.

Students are encouraged to pass their countries licensing examinations before their graduation for many reasons. The examinations may also show a student subjects where more study and learning are needed.

BASIC SCIENCE COURSE DESCRIPTIONS

HUMAN ANATOMY (160 hours) This course consists of daily lectures and laboratory on human anatomy and function. The students will dissect and identify the bones, muscles, organs, nerves, blood vessels, Connective tissues, and cavities of the human body. This will include a discussion on nomenclature and orientation, anatomic terms, direction and movement, classification of joints, surface and gross anatomy, blood flow and nervous system control of the head and neck, back, upper extremity, thorax,

abdomen, pelvis and lower extremity. Radiographic images will also be studied from x-ray, computerized assisted tomography (CAT), magnetic resonant images (MRI) angiographs, and sonographs.

HUMAN NEUROANATOMY (80 hours) Human Neuroanatomy will consist of lectures and laboratory of surface and internal neuroanatomy. In this course students will learn about brain structure, neurons, neuroglia membrane potential and nerve impulse (action potential), receptors, nervous system development; detailed neuroanatomy of the brain and spinal cord including the cerebral cortex, medulla, pons, midbrain, and diencephalon, reticular formation cerebellum, peduncles, thalamus, hypothalamus, epithalamus and subthalamus, basal ganglia limbic system, cerebral hemispheres, cerebral cortex, pain and pain inhibitions pathways; pathways; cranial nerves: the viscera nervous system including parasympathetic and sympathetic division; and support system of the central nervous system including blood supply venous drainage dural sinuses, meninges, ventricles, cerebrospinal fluid, and spinal cord blood circulation. Radiological images will also be studied from x-rays, computerized assisted tomography (CAT), magnetic resonant images (MRI), angiographs, and sonographs.

HISTOLOGY & EMBRYOLOGY (80 hours) Consists of two courses conducted simultaneously. Histology is a lecture and laboratory courses, will cover the detail of cellular structure and function of all the different types of cells in the human body including skin, hair and nails, nervous tissue and eyes, striated and smooth muscle, cardiac muscle, connective tissue, bones, blood vessels, endocrine organs, lungs, gastrointestinal organs, reproductive organs and kidneys. Embryology will cover embryonic staging, early development including fertilization, implantation, primitive streak, notochord, neural plate, tube and crest, coelom, somites, head and tail folds; placenta and fetal membranes (germ layers, yolk sac and allantois, chorion circulation, multiple pregnancy); cardiovascular system (blood and lymph formation, aortic arches, heart development, fetal blood flow and changes at birth, congenital malformations), nervous system development (early neurulation, alar and basal plates, spinal nerves, brain development), branchial apparatus, coelom, respiratory system, digestive system, urogenital system, bone development, muscles, limbs, integumentary system, and parturition.

HUMAN PHYSIOLOGY (160 hours) Chemical and physical properties of physiology: cell Chemistry; cell metabolism; homeostasis; neural and endocrine control mechanisms; membrane transport; actions potentials, neural signals; brain function; somatosensory controls; special senses; skeletal, cardiac smooth muscle: somatic and automatic motor systems; cardiac function; blood and vascular system; cardiovascular regulation; respiratory dynamics; gas exchange and transport; respiratory regulation, renal and function and function, body fluid, electrolyte, and acid-base balance control,

gastrointestinal organization, secretion, motility and control, absorption and digestion; endocrine control of metabolism and growth; reproduction, pregnancy, birth and location; introduction to the physiology of the immune system.

MEDICAL BIOCHEMISTRY (120 hours) Lecture and laboratory studies of proteins, enzymes, lipids, biological membranes and membrane transport, carbohydrate structure, glycolysis, pentose phosphate pathway, glycogen metabolism and gluconeogenesis, citric acid cycle, oxidative phosphorylation, lipid metabolism, amino acid, metabolism, biosynthesis of purine and pyrimidine nucleotide, signal transduction pathways and harmony action, nucleic acid structure, replication, transcription, purine and pyrimidine nucleotides, signal transduction pathways and harmony action, nucleic acid structure, replication, transcription, protein synthesis, techniques in molecular biology including restriction fragment length polymorphism (RFLP) and polymerase chain reaction (PCR). Also included in the biochemistry curriculum is a clinical review of enzyme deficiencies and their metabolic consequences, vitamin and mineral deficiencies and excesses, and selected drug interactions.

MEDICAL GENETICS (60 hours) - A lecture based course which includes DNA, genes, and chromosomes; restriction fragment length polymorphism (RFLP), polymerase chain reaction (PCR) gene mutations; chromosome studies including banding, abnormalities, translocations, deletions and insertions karyotype nomenclature; cell division (mitosis, meiosis); loci, alleles and segregation, dominant and recessive inheritance new mutation, penetrance, and gene expression, gene maps and linkage: chromosome disorders, frequency, down, syndrome, sex chromosome abnormalities (Klinefelter's XYY males, Turner's syndrome 47-XXX females, cancer chromosome breakage); single gene disorders including aminoacidopathies, transport disorders, storage disorders, connective tissue disorders: multifactorial disorders; management of genetic disorders and genetic counseling,

MICROBIOLOGY AND IMMUNOLOGY (100 HOURS) - Lecture and laboratory including the study of infectious agents, normal flora, biology of infectious agents, bacterial genetics and action, constitutive and induced defenses of the body, bacteria toxins, infectious agents, gram positive and gram negative bacteria, acid fast bacteria, spirochetes; viruses; fungi; virions: systemic. The pathophysiology of infectious diseases, immunocompromised patients. AIDS, congenital and neonatal infections, zoonoses, fever of unknown origin, nosocomial, and iatrogenic infections will also be studied. Immunology portion will study immunity, the cellular basis of the immune response, antibodies, humoral immunity cell-mediated immunity, major histocompatibility complexes and transplantation. complement, antigen-antibody reactions, hypersensitivity and allergy, tolerance and autoimmune diseases, tumor immunity, and immunodeficiency.

PARASITOLOGY & TROPICAL MEDICINE (80 hours) - This is a lecture and laboratory course. The parasitology portion of the will consist of the study of an introduction to Parasitology including blood and tissue protozoa, intestinal and vaginal protozoa, intestinal helminths, tissue and blood helminths, ectoparasites (scabies, lice, etc.). Tropical medicine portion will emphasize the presentation, diagnosis treatment and maintenance of tropical diseases. It will also include community and preventive measure that can be used to combat spread of tropical diseases.

GENERAL PATHOLOGY (100 hours) - A lecture and laboratory class studying general pathology including diagnosis autopsies characteristics classification and incidence of disease, disorders of growth, differentiation and morphogenesis, responses to cellular injury, inflammation, healing, metabolic and degenerative disorders, thrombosis, circulatory embolism and infarction, immunology and immunopathology, carcinogenesis, benign and malignant tumors.

BIostatISTICS AND MEDICAL WRITING (40 hours) - This course is a lecture to train students in biostatistics and medical writing. Students will learn about probability theory, regression, tables and graphs, descriptive statistics, skewing, probability distributions, sampling, confidence interval hypothesis testing, analysis of variance, correlation chi square tests, descriptive studies, analytic studies, and intervention studies, etc. Medical writing will include report preparation and history taking.

SYSTEMIC PATHOLOGY 1 (160 hours) - The systemic portion of this course will consist of the study of the pathology and pathophysiology of the cardiovascular system, central and peripheral nervous system, respiratory tract, alimentary system including the mouth, teeth, esophagus, stomach and digestive tract, liver, biliary system and exocrine pancreas.

PHARMACOLOGY (160 hours) - This course is a lecture series which include drug regulations and governmental controls, the principles of pharmacology, drug administration, pharmacokinetics, drug actions, interactions, tolerance dependence and withdrawal; drugs of the peripheral nervous system and special senses; central nervous system drugs; cardiovascular drugs; respiratory drugs; gastrointestinal agents; antibiotics; antifungals; antivirals; antiparasitic drugs; anticancer drugs; anti-inflammatory, autacoids, NSAIDs, and agents for arthritis and gout; and immunomodulating drugs; drugs affecting the system, sexual affectious drugs, oxytocic drugs and uterine relaxants, anti-migraine drugs, vitamins and minerals, food additives, toxicology, and newly introduced drugs. Contraindications to use of drugs and drug classes will also be discussed.

BEHAVIORAL SCIENCE (120 hours) This is a lecture course consisting of the study of psychoanalytic theory, conditioning, child development, gender related psychology, electroencephalograms and imaging, psychological testing, sleep, sex, psychopathology, genetic influences drug abuse, suicide and homicide, etiology, memory, neuropsychology and behavioral neurology emotions and hypothalamic functioning, behavioral neurochemistry neurotransmitters medical ethics. The course will also include detailed lectures in psychiatry and psychiatric treatment of the following disorders: infant, childhood and adolescent disorders; delirium, dementia, amnesic and cognitive disorders; mental disorders due to medical conditions; substance related disorders; schizophrenia and other psychotic disorders; mood disorders; anxiety disorders; somatoform disorders; factitious disorders; dissociative disorders; sexual and gender identity disorders; eating disorders; sleep disorders; impulse control disorders not elsewhere classified; adjustment disorders; and personality disorders.

CHILD & DRUG ABUSE, HUMAN SEXUALITY (40 HOURS) This is a lecture class that includes the psychology and patterns of child abuse; physicians responsibility in suspected child and elder abuse cases, ethics, pathology signs of child abuse, diagnostic techniques in suspected child abuse cases, physical examination, reporting and counseling. The drug abuse portion of this class involves a specific and detailed investigation of substance abuse diagnosis and treatment including but not limited to alcohol; cocaine; opiates including morphine and heroin; barbiturates and benzodiazepines; neuroexcitatory drugs and stimulants; depressants; anxiolytics; marijuana; LSD; glue; and designer drugs. The human sexuality portion will study the development and anatomy of sexual and reproductive organs; endocrine control of sexually, psychosexual responses, sensory innervation of sex organs, the sexual response cycle in men and women, normal sexual practices, abnormal sexual behaviors, and psycho physiological behaviors recently elucidated.

OCCUPATIONAL AND REHABILITATION MEDICINE (40 hours) This is a lecture consisting of the study of occupational diseases including the anatomy, physiology and pathology and treatment. This study includes psychiatric disorders, as well. Rehabilitation portion will study fundamentals of neurologic and physical rehabilitation techniques, and relearning.

NUTRITION (40 hours) This is a lecture consisting of the study of food and its use; assessment of nutrition status; primary nutrition disorders, obesity, food sensitivity, malnutrition in disease states, nutrition support, nutrition as a cofactor in disease, nutritional factors in health promotion, nutritional factors in disease prevention.

MOLECULAR BIOLOGY (100 hours) - This course bridges the gap between histology, physiology, and biochemistry. The course teaches students about microcellular mechanisms which include cellular transport and sorting, receptor mediated endocytosis, microtubule dynamics, cell powerhouses, translation of mRNA, membrane architecture, membrane cytochemistry, cilia structure and dynamics, cytoskeletal microfilament structure, nuclear organization, organization of chromosomes, nucleolar structure and function, movement through nuclear pores, epithelial polarity, adhesion molecules. This course will also provide the student with more detailed information on the structure, operation and physiology of organelles and microorganelles.

SYSTEMIC PATHOLOGY 2 (160 hours) This course is a continuation of the general and introduction to systemic pathology course described above. It consists of lecture and laboratory study of pathology and pathophysiology of the endocrine system, breast, female genital tract, male genital tract, kidneys and urinary tract, lymphoreticular system, blood and bone marrow, skin, osteoarticular and connective tissues.

PHYSICAL DIAGNOSIS (80 hours) This course is a preclinical course of lecture, laboratory, and clinical introduction. It consists of the study and training in medical recording and confidentiality; interviewing techniques and history-taking; general physical examination, examination of the skin, nails and hair; ear; nose and throat; respiratory system; heart and cardiovascular system; abdomen; female breast and genitalia; male genitalia; bone, joint and muscle and the nervous system including the cranial nerves motor system, cerebellar system, sensory system, and the unconscious patient organ. This course will include investigation of signs, symptoms and patient presentations, organ orientation, instrument usage and evaluation of current medical arts and sciences. The medical diagnosis portion of the class will train students in diagnostic protocol, procedure, costs, and administration. It will include blood counts, electrolyte panels, lipid and cholesterol studies, endocrine studies, pap smears, pathologic studies and methods, spinal taps, medical protocol, and physician referrals.

MEDICAL DIAGNOSIS (40 hours) The medical diagnosis portion of the class will train students in diagnostic protocol, procedure, costs, and administration. It will include blood counts, electrolyte panels, lipid and cholesterol studies, endocrine studies, pap smears, pathological studies and methods, spinal taps, medical protocol, and physician referrals

EPIDEMIOLOGY & PREVENTIVE MEDICINE (80 hours) This is a lecture course that includes the study of causes of diseases, establishing causality, descriptive studies, incidence and prevalence, age standardization, life expectancy, analytic studies, prospective risk, risk, relative risk, retrospective studies interventional studies, methodological issues, historical and geographical controls, randomized controls, ethical

issues. Specific disease epidemiology will be discussed and analyzed such as influenza, cold, yellow fever, polio, food poisoning, etc. The preventive medicine part of the class will include the study of medical preventive (primary-secondary) patterns of mortality and morbidity in developing countries.

INTRO RADIOLOGY (40 hours) This is a preclinical class consisting a lecture, laboratory, and clinical study. It consists of a study of radiological imaging such as X-rays, Computer Aided Tomography. Magnetic resonant imaging, ultrasound including Doppler ultrasound, angiography, cerebral and spinal contrast studies, nuclear imaging studies, ventilation/perfusion studies, etc.

INTRO PATIENT CARE AND TREATMENT (120 hours) This is a preclinical course. The purpose is to prepare the medical student to take responsibility for the care and management of patients. It is a series of short courses consisting of hospitality, demeanor, physician responsibility, medical management and protocol, cost-to-patient analysis, ethics, specific training in triage, emergency techniques and protocols, basic *dental hygiene, dental care and referral*, acute cardiac and life support, chest pain protocols, bum management, electrolyte management, blood and plasma transfusions and protocols, drug abuse diagnosis and treatment, obstetrical and gynecological management, neonate management and care, pediatric care immunization, health and well-child care. This course will also include introduction to anesthesiology, surgery, and surgical techniques. Additionally, this course covers the use of intravenous fluids and solutions during emergencies, surgery, and other situations. This course will, additionally, consist of a computerized patient simulator. The medical student will learn blood gas calculations, acid-base analysis and treatment, and EKG interpretation, trauma, and critical life-support for cardiac arrest, arrhythmias, and sudden cardiac death.

INTRO CLINICAL MEDICINE (80 hours) - This is a preclinical course. This course trains medical students to recognize, diagnose and treat common clinical pathologies. The course covers infections, skin diseases, diseases of the joints and bones, respiratory disorders, cardiovascular disorders, renal disease, endocrine, metabolic and nutritional disorders, gastrointestinal disorders, disorders of the liver and pancreas, disorders of the blood and lymph, disorders of muscles and connective tissue, disorders of the eye and nervous system.

All students must pass the Basic Science Comprehensive Examination and must receive the Basic Science Completion Certificate before moving onto clinical rotations or taking the USMLE Part I.

CLINICAL SCIENCES

The last six trimesters, ninety-two (92) weeks consists of sixty (60) weeks of core clerkships (Internal Medicine, Obstetrics and Gynecology, General surgery Pediatrics, Family Medicine, Psychiatry, and Emergency Medicine), twenty (20) weeks of electives, and twelve weeks of mandatory community service.

The purpose of the clinical sciences curriculum is to train the medical student to apply the concepts and principles that are important in health and diseases and that constitute the basis of safe and effective patient care. As stated by the USMLE, St. Luke goal is to provide the medical knowledge and understanding of clinical sciences considered essential for the providing patient care under supervision, including emphasis on health promotion and disease prevention. St. Luke's curriculum for clinical science rotations is cantered around the essentials for medical education required by the Liberia Medical and Dental Council, and the Content Description for USMLE step and the Clinical Skills Assessment Examination given by the Educational Commission for Foreign Medical Graduates.

Clerkships will be available for students for all clinical science students in Liberia. Transfer students will also permitted to do clinical rotations in Liberia. *Clinical rotations will be available in Liberia, the United States, and other countries.*

Clinical Science Courses - Year 3 (Core Rotations)

CORE

Liberia

72 Weeks

Internal Medicine	12 weeks
Obstetrics and Gynecology	08 weeks
General Surgery	12 weeks
Pediatrics	08 weeks
Family Medicine / Primary Care / Preventive Medicine	06 weeks
Psychiatry	06 weeks
Emergency Medicine	04 weeks
Radiology	04 weeks
Community Medicine	12 weeks

ELECTIVES: 04 weeks minimum

20 weeks

Any combination of the above rotations with 4 weeks minimum except the last rotation. Twenty (20) weeks total.

Surgery Subspecialties

General Surgery, Neurosurgery, Orthopedic Surgery, Urology, Ophthalmology, Plastic Surgery, Oncology Surgery, Obstetrics and Gynecology, Pediatric Surgery, Cardiothoracic Surgery, Ear Nose and Throat, Transplant Surgery, Maxillofacial Surgery, etc.

Internal Medicine

Endocrinology, Cardiology, Neurology, Hematology, Oncology, Gastroenterology, Pneumology, Dermatology, Infectious Diseases, Preventive Medicine, Immunology, Epidemiology, etc.

Pediatrics and subspecialties

Pediatrics, neonatology, pediatric surgery, pediatric oncology, etc.

Psychiatry and subspecialties

Family Practice and subspecialties or General Medicine

Emergency Medicine and subspecialties, Critical Care Medicine

Community or Preventive Medicine

Rehabilitation Medicine

Clinical Pathology (including intro to autopsy)

Refugee Medicine

Weeks Total

92

Each student in clerkship will be required to submit a three-page report on a specific medical pathology, epidemiology, signs & symptoms, diagnosis, and treatment, or one interesting case history, each rotation. The topics will be provided by St. Luke's administration and they will be based on the contents of the Liberia Medical Licensing Examination (LMLE), the USMLE Step 2 Content Outline, and the USMLE CSA Content Outline. The case history should be discussed with your proctor. The purpose of these reports is two-fold:

- (1) The reports will help the student in his/her preparation for the Liberia MLE, and the USMLE Step 2 and CSA exams,
- (2) The reports will help provide information that may be used to help other students prepare for the Liberia MLE, USMLE Step 2, and CSA exams.

All reports will be kept at the school office and/or on-line and each will be available for students, staff and administrators of the school for review, if needed.

Clinical Science students will be required to participate in clerkships from six to eight hours daily. Additionally, there will be lectures, Liberia MLE reviews, and USMLE Part 2 and CSA reviews scheduled weekly where attendance is mandatory. The lectures are given by specialists in their fields and are to supplement the knowledge and experience they acquire doing their clerkships. The purpose of the LMLE, USMLE Part 2 and CSA reviews is to prepare each student with the information they need to pass the LMLE, the USMLE Part 2 and CSA examinations.

Exhibit 37 – LMB Press Release, March 2005

LIBERIA MEDICAL BOARD (LMB)
MINISTRY OF HEALTH & SOCIAL WELFARE
MONROVIA, LIBERIA

PRESS RELEASE

March 29, 2005

LADIES AND GENTLEMEN OF THE PRESS.

The Liberia Medical Board, in her meeting of March 15, 2005, deliberated on the issue of "St. Luke Medical School" reportedly operating in Liberia.

While it is not our policy to run the affairs of the Board in the press, we feel obliged at this time, to set the record straight on this very crucial issue, for the benefit of the general public. This move is especially imperative since "St. Luke Medical School", in the last few days, provided headlines in the print and electronic media. Accordingly, the Liberia Medical Board is pleased to present the following facts as contained in the records and files of the Board for the information of the general public.

1. During the Board Meeting of February 12, 2004, the secretariat of the Board presented documents of "19 doctors" who reportedly completed their course of study at St. Luke Medical School for the degree of Doctor of Medicine (MD). **EB**
2. The documents were presented to the office of the Board for licensure by Dr. Meimei Dukuly, on behalf of St. Luke Medical School, since he was the contact person.

3. The Board was greatly angered by this bold and shameless act which is considered an insult to the integrity and professionalism of the Liberia Medical Board, since in fact:

- a. The Board has no knowledge of a "St. Luke Medical School" operating in Liberia.
- b. The Board can not and does not issue license to any Doctor who
 - Is not a graduate of a recognized medical school,
 - Does not present a certificate of internship from the JFK Medical Center,
 - Does not satisfactorily pass a comprehensive clinical assessment examination, or
 - who does not present a valid license from the country where he/she was trained, or has practiced medicine.

4. The Board therefore did not admit the applications of the doctors for discussion, but rather warned the representatives of "St. Luke Medical School" to legally and properly apply to operate a medical school in Liberia by meeting all requirements thereto.

5. On March 8, 2005, the Liberia Medical Board received a letter of invitation to the "Campus of St. Luke Medical School" in Gaye Town, Old Road, Congo Town, for assessment for the purpose of granting a