

From: Brannon Kealoha <brannonk@hawaii.edu>
Sent: Tuesday, July 19, 2016 12:22 PM
To: China, Julie H
Cc: Richard N. Wurdeman; C. M. Kaho'okahi Kanuha; Carlsmith Ball LLP;
Cindy Freitas; Glen Kila; Harry Fergerstrom; J. Leina'ala Sleightholm;
Joseph Kualii Lindsey Camara; Judge Riki May Amano (Ret.);
Kalikolehua Kanaele; Lanny Alan Sinkin; Maelani Lee; Mehana Kihoi;
Cain, Michael; Richard L. DeLeon; Stephanie-Malia Tabbada; Tiffnie
Kakalia; Torkildson, Katz, Moore, Hetherington & Harris; Torkildson,
Katz, Moore, Hetherington & Harris; Watanabe Ing LLP; Watanabe Ing
LLP; William Freitas; Wynhoff, Bill J; Timothy Lui-Kwan
Subject: Re: Resent: Kamahana Witnesses under protest of deadline and
motion to extend

So did you receive my motions as summarized or not? These will have to do and were turned in on the 18th. Please confirm. I see that the time stamp is 508pm 7/18 on the email you responded to here delineating my motions, since you were unable to receive them as a file so I re-composed the motions in an effort to save time in summary. I am satisfied that the motions are clear and my intent and efforts and reasons are included to accommodate the fact that these attachments don't seem to be getting to you. Respectfully, as stated and submitted, those were my two motions and witness lists. I will respond to this email, which you did receive yesterday as time stamped. It was received by you yesterday 7/18.

The first two are motions

1- In support of another party's motion to extend the due date, we hope to hear an answer from the hearing officer Judge Amano, of course, and does not solicit answer, out of protocol from you. So I am sorry if you assumed that, respectfully.

2- The second delineates my own individual motion requesting an extension.

3- Was to be my witness list but was incomplete and this mistake was caught and the immediate email following, ALSO received by you on 7/18 states my proposed witnesses.

To be clear I am not asking you individually to extend anything. I merely reserve any rights I have if any. My email simply restates the motions and substitutes for the original motions you are unable to receive and clearly states my motions and has been submitted to you AS my motions. If you are asking for the original documents, in addition, to be mailed as a supplement to my motions and witness list submitted yesterday on time then I will be happy to send. Otherwise I am under the impression that these will substitute just fine as my submission on time of a motion in support of motions to extend, a motion to request extension from myself and my proposed witness list. You have received these on 7/18.

I am not going to withdraw these and turn in motions late. As far as I can tell they are on time so please clarify. Due to the circumstance you've made evident, I've clearly asserted and submitted these as my motions yesterday on time and will not be coerced or compelled to withdraw these on time motions, in the clear understanding that if I do I will be considered late.

Now are you saying that you are refusing my on time submissions of these two motions and my witness list?

I will also reply to the followup email to this to reconfirm your receipt time stamp of the edit to the third item, my witness list, also submitted 7/18 on time.

Please clarify. You seem to be saying (1) I am asking you to make some decisions out of protocol, but I am not and you can see that I reserve what rights I may have and what rights administrators have in leniency IF ANY instead AND (2) that you, for some reason, may not be accepting my on time submissions of my two motions and witness list proposal. Is this correct?

Thank you for your time. If you are frustrated or troubled by anything believe me it should be with this so-called user friendly system and for that we are in it together, with all due respect.

Again I will respond to the time stamped submission of my edited and reworked witness list and you can verify the time stamp for the submissions of my two motions re-quoted below.

I eagerly look forward to your response and appreciate greatly your time, clarification, and patience in all our matters.

Thank you very much for your guidance,

Kamahana Kealoha

p.s. My name keeps being misprinted and mis-typed. It's "Kealoha" not "Keahola." -Mahalo

On Tuesday, July 19, 2016, China, Julie H <Julie.H.China@hawaii.gov> wrote:

Mr. Kealoha and everyone on this e-mail: If we cannot receive your e-mail and open all attachments, you need to mail hard copies to Judge Amano, OCCL/Michael, and me, and serve everyone else with hard copies. This is your responsibility. If you know or are unsure whether your e-mail and attachments were received, mail hard copies out today. By sending this message, I am not waiving any deadlines because I am not entitled to do so. I am merely attempting to ensure that the process moves forward smoothly. Thank you.

Julie H. China
Deputy Attorney General
Land/Transportation Division

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From: Brannon Kealoha [mailto:brannonk@hawaii.edu]
Sent: Monday, July 18, 2016 5:04 PM
To: China, Julie H <Julie.H.China@hawaii.gov>
Cc: Richard N. Wurdeman <rnwurdeman@rnwlaw.com>; C. M. Kaho'okahi Kanuha <kahookahi@gmail.com>; Carlsmith Ball LLP <isandison@carlsmith.com>; Cindy Freitas <hanahanai@hawaii.rr.com>; Glen Kila <makakila@gmail.com>; Harry Fergerstrom <hankhawaiian@yahoo.com>; J. Leina'ala Sleightholm <leina.ala.s808@gmail.com>; Joseph Kualii Lindsey Camara <kualiiic@hotmail.com>; Judge Riki May Amano (Ret.) <rma3cc@yahoo.com>; Kalikolehua Kanaele <akulele@yahoo.com>; Lanny Alan Sinkin <lanny.sinkin@gmail.com>; Maelani Lee <maelanilee@yahoo.com>; Mehana Kihoi <uhiwai@live.com>; Cain, Michael <michael.cain@hawaii.gov>; Richard L. DeLeon <kekaukike@msn.com>; Stephanie-Malia Tabbada <s.tabbada@hawaiiantel.net>; Tiffnie Kakalia <tiffniekakalia@gmail.com>; Torkildson, Katz, Moore, Hetherington & Harris <lsa@torkildson.com>; Torkildson, Katz, Moore, Hetherington & Harris <njc@torkildson.com>; Watanabe Ing LLP <douging@wik.com>; Watanabe Ing LLP <rshinyama@wik.com>; William Freitas <pohaku7@yahoo.com>; Wynhoff, Bill J <Bill.J.Wynhoff@hawaii.gov>; Timothy Lui-Kwan <tluikwan@carlsmith.com>

Subject: Re: Resent: Kamahana Witnesses under protest of deadline and motion to extend

Aloha,

I have no objection to your report that it is not coming through but am working on identifying the issue. Not sure why you are receiving or not receiving my official submissions. Let this summary substitute the originals you are having trouble receiving. The original documents and details within are available and the motions and requests are the same. I am in the process of figuring out why you are not receiving my email now and hope that if anyone can help rectify the issue they will assist. I seem to see the same indiacernable text in other party's attempts. What time is the confirmed deadline?

If not possible before apparent deadline, than I assert the following motions, actions and summaries as my primary submittal. The following requests supplement the actual final drafts you are unable to receive currently, and request that the following statements be officially accepted formally:

1) A motion to support all motions to extend deadline based on failure of the honorable proceeding's officer to fulfill the promised deadline of confirmation to the former pre-hearing's verbal notification of the due date and followup re: written notification and clarification If deadlines and requirements. Parties objecting claim the verbal pre-hearing statements, unclarified and unconfirmed, should serve as the confirmation of dealine. Yet we see the failure to meet verbally promosed deadline for service of confirmation and clarification blatantly disproves that frivolous generalization.

2) I assert my own motion to extend the deadline of 7/18 based on the above and more evidence that I reserve the right to provide if needed. Parties claiming this motion as a tactic fail to provide evidence for claims of stalling tactics being used. If this process will take sweeping, factless, generalizations as evidence I respectfully submit that the tactic being used by opponents is to suggest the false idea that enough time had been given. As a new party I have proof that this claim is false.

3) Here is my wittness list. I plan to submit witness requests as needed in the future as afforded by the regulations of this proceeding and the discretionary power, of any afforded the honorable Amano.

Thank you for your attention to these matters. I have the original motions and items available for further clarification. The items listed above are summaries of the documents and requests themselves. I submit this and ask it be accepted and recognized.

Kamahana Kealoha

On Monday, July 18, 2016, China, Julie H <Julie.H.China@hawaii.gov> wrote:

Hi,

If you look at the message below, you'll see that it's not coming through. Can you try to send it again some other way?

Julie H. China

Deputy Attorney General

Land/Transportation Division

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Kahookahi Kanuha Witness List

3:01 pm
Kahookahi Kanuha
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