

517518.1  
WATANABE ING LLP  
A Limited Liability Law Partnership

**J. DOUGLAS ING** #1538-0  
**ROSS T. SHINYAMA** #8830-0  
**SUMMER H. KAIawe** #9599-0  
First Hawaiian Center  
999 Bishop Street, 23rd Floor  
Honolulu, Hawaii 96813  
Telephone No.: (808) 544-8300  
Facsimile No.: (808) 544-8399  
E-mails: rshinyama@wik.com

Attorneys for  
**TMT INTERNATIONAL OBSERVATORY, LLC**

BOARD OF LAND AND NATURAL RESOURCES  
FOR THE STATE OF HAWAII

IN THE MATTER OF

A Contested Case Hearing Re Conservation  
District Use Permit (CDUP) HA-3568 for the  
Thirty Meter Telescope at the Mauna Kea  
Science Reserve, Kaohe Mauka, Hamakua  
District, Island of Hawaii, TMK (3) 4-4-  
015:009

Case No. BLNR-CC-16-002

**TMT INTERNATIONAL  
OBSERVATORY, LLC'S OBJECTIONS  
TO WITNESS LISTS; CERTIFICATE OF  
SERVICE**

**TMT INTERNATIONAL OBSERVATORY, LLC'S OBJECTIONS TO WITNESS LISTS**

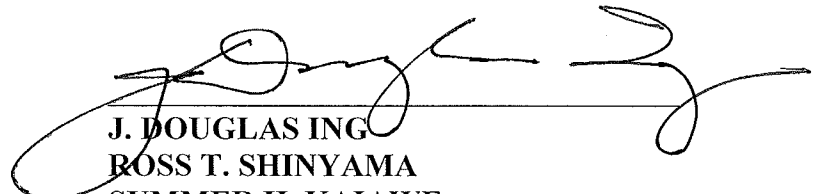
TMT International Observatory, LLC ("TIO"), by and through its undersigned counsel,  
and pursuant to Minute Order No. 13 [Doc. 115], hereby submits its Objections to Witness Lists.

TIO objects to the Witness Lists as follows:

- (1) TIO objects to any and all witnesses that are immaterial, irrelevant, and/or unduly  
repetitious.

- (2) TIO objects to any and all witnesses that may be called to testify on areas or issues that are outside the subject matter jurisdiction of this Hearings Officer, including, but not limited to, sovereignty, ceded lands, the existence of the Kingdom of Hawai'i, the alleged illegal overthrow of the Kingdom of Hawai'i, and/or any other non-justiciable political questions.
- (3) TIO reserves the right to assert and/or raise additional objections to witnesses once the written direct testimonies of such witnesses are produced in this matter.
- (4) TIO also hereby joins in the University of Hawai'i at Hilo's objections to witness lists.

DATED: Honolulu, Hawaii, August 1, 2016.



**J. DOUGLAS ING**  
**ROSS T. SHINYAMA**  
**SUMMER H. KAIawe**  
Attorneys for **TMT INTERNATIONAL**  
**OBSERVATORY, LLC**

BOARD OF LAND AND NATURAL RESOURCES

STATE OF HAWAII

Contested Case Hearing Re Conservation  
District Use Application (CDUA) HA-3568  
for the Thirty Meter Telescope at the Mauna  
Kea Science Reserve, Ka'ohe Mauka,  
Hāmākua, Hawai'i, TMK (3) 4-4-015:009

BLNR Contested Case HA-16-02

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served upon the following parties by the means indicated:

Michael Cain  
Office of Conservation and Coastal  
Lands  
1151 Punchbowl, Room 131  
Honolulu, HI 96813  
[michael.cain@hawaii.gov](mailto:michael.cain@hawaii.gov)  
*Custodian of the Records  
(original + digital copy)*

Judge Riki May Amano (Ret.)  
[rma3cc@yahoo.com](mailto:rma3cc@yahoo.com)  
*Hearing Officer*

Julie China, Deputy Attorney General  
[julie.h.china@hawaii.gov](mailto:julie.h.china@hawaii.gov)  
*Counsel for the Board of Land and  
Natural Resources*

Carlsmith Ball LLP  
[isandison@carlsmith.com](mailto:isandison@carlsmith.com)  
*Counsel for the applicant University of  
Hawai'i at Hilo*

Richard N. Wurdeman  
[RNWurdeman@RNWLaw.com](mailto:RNWurdeman@RNWLaw.com)  
*Counsel for the petitioners Mauna Kea  
Anaina Hou, Clarence Kukauakahi  
Ching, Flores-Case Ohana, Deborah J.  
Ward, Paul K. Neves, and Kahea: The  
Environmental Alliance*

Harry Fergerstrom  
[hankhawaiian@yahoo.com](mailto:hankhawaiian@yahoo.com)

Richard L DeLeon  
[kekaukike@msn.com](mailto:kekaukike@msn.com)

Mehana Kihoi  
[uhiwai@live.com](mailto:uhiwai@live.com)

C. M. Kaho'okahi Kanuha  
[kahookahi@gmail.com](mailto:kahookahi@gmail.com)

Joseph Kualii Lindsey Camara  
[kualiic@hotmail.com](mailto:kualiic@hotmail.com)

Torkildson, Katz, Moore,  
Hetherington & Harris  
[lsa@torkildson.com](mailto:lsa@torkildson.com)  
[njc@torkildson.com](mailto:njc@torkildson.com)  
*Counsel for Perpetuating Unique  
Educational Opportunities (PUEO)*

J. Leina'ala Sleightholm  
[leina.ala.s808@gmail.com](mailto:leina.ala.s808@gmail.com)

Maelani Lee  
[maelanilee@yahoo.com](mailto:maelanilee@yahoo.com)

Lanny Alan Sinkin  
[lanny.sinkin@gmail.com](mailto:lanny.sinkin@gmail.com)  
*Representative for The Temple of Lono*

Kalikolehua Kanaele  
[akulele@yahoo.com](mailto:akulele@yahoo.com)

Stephanie-Malia:Tabbada  
[s.tabbada@hawaiiantel.net](mailto:s.tabbada@hawaiiantel.net)

Tiffnie Kakalia  
[tiffniekakalia@gmail.com](mailto:tiffniekakalia@gmail.com)

Glen Kila  
[makakila@gmail.com](mailto:makakila@gmail.com)

Dwight J. Vicente  
2608 Ainaola Drive  
Hilo, Hawaiian Kingdom

Brannon Kamahana Kealoha  
[brannonk@hawaii.edu](mailto:brannonk@hawaii.edu)

Cindy Freitas  
[hanahanai@hawaii.rr.com](mailto:hanahanai@hawaii.rr.com)

William Freitas  
[pohaku7@yahoo.com](mailto:pohaku7@yahoo.com)

Wilma H. Holi  
P.O. box 368  
Hanapepe, HI 96716

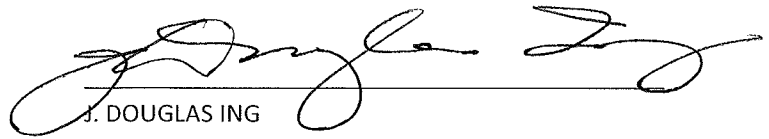
Ivy McIntosh  
[3popoki@gmail.com](mailto:3popoki@gmail.com)

Moses Kealamakia, Jr.  
[mkealama@yahoo.com](mailto:mkealama@yahoo.com)

Crystal W. West  
[crystalinx@yahoo.com](mailto:crystalinx@yahoo.com)

Patricia Ikeda  
[pehekeanila@gmail.com](mailto:pehekeanila@gmail.com)

DATED: Honolulu, Hawaii, August 1, 2016.

A handwritten signature in black ink, appearing to read "J. Douglas Ing", written over a horizontal line.

J. DOUGLAS ING

ROSS T. SHINYAMA

SUMMER H. KAIawe

Attorneys for **TMT International Observatory LLC**