

William Freitas
P.O. 4650
Kailua Kona HI 96745
pohaku7@yahoo.com

BOARD OF LAND AND NATURAL RESOURCES
FOR THE STATE OF HAWAII

IN THE MATTER OF) Case No. BLNR-CC-16-002
)
A Contested Case Hearing Re Conservation;) MOTION FOR EXTENSION
Use Application (CDUA) HA-3568 For the) OF TIME FOR FILING OF
Thirty Meter Telescope at the Mauna Kea) MOTIONS, WITNESS AND
Science Reserve, Ka'ohe Mauka, Hamakua,) EXHIBIT LISTS AND DIRECT
Hawai'i TMK(3)4-4-015:009) TESTIMONIES AND PRE-
) HEARING STATEMENT;
) MEMORANDUM IN SUPPORT;
) CERTIFICATE OF SERVICE

MOTION FOR EXTENSION OF TIME FOR FILLING OF MOTIONS,
, WITNESS AND EXHIBIT LISTS AND DIRECT TESTIMONIES AND
PRE-HEARING STATEMENT

I William Freitas, "Petitioner" move this Hearing Officer for Motion for Extension of Time for Filing of Motions, Witness and Exhibit Lists and Direct Testimonies and Pre-hearing Statement pursuant to Hawaii Administrative Rules 13-1-34.

This motion is supported by the Memorandum.

Kailua Kona HI., October 4, 2016

William Freitas, Petitioner

Received
Office of Conservation and Coastal Lands
2016 Oct 04 2:40 pm
Department of Land and Natural Resources
State of Hawaii

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BOARD OF LAND AND NATURAL RESOURCES
FOR THE STATE OF HAWAII

IN THE MATTER OF) Case No. BLNR-CC-16-002
)
A Contested Case Hearing Re Conservation;) **MEMORANDUM IN SUPPORT**
Use Application (CDUA) HA-3568 For the) **OF MOTION FOR MOTION FOR**
Thirty Meter Telescope at the Mauna Kea) **EXTENSION OF TIME FOR**
Science Reserve, Ka'ohe Mauka, Hamakua,) **FILING OF MOTIONS, WITNESS**
Hawaii TMK(3)4-4-015:009) **AND EXHIBIT LISTS AND**
) **DIRECT TESTIMONIES AND PRE-**
) **HEARING STATEMENT;**
) **CERTIFICATE OF SERVICE**

MEMORANDUM IN SUPPORT OF MOTION FOR MOTION FOR EXTENSION
OF TIME FOR FILING OF MOTIONS, WITNESS AND EXHIBIT LISTS AND
DIRECT TESTIMONIES AND PRE-HEARING STATEMENT

I. INTRODUCTION

Minute Order No. 20, [DOC 289], On Monday, October 3, 2016, at 10:00 a.m. -
1:00p.m., there shall be a Fifth Pre-Hearing Conference that will be held at The Grand
Nanioloa Hotel, Crown Room at 93 Banyan Drive, Hilo, Hawaii 96720.

II. ARGUMENT

I William Freitas, "Petitioner" argues that the Minute Order 19 [DOC 281] that was
filed on September 23, 2016 in the Document Library and at the Meeting on October 3,

2016 at the Crown Room of the Grand Naniloa Hotel [DOC 289]. Minute Order 19 DOC 281 did not provide enough time for the Parties to respond to this Minute Order and Order on meeting at Crown Room ordered by the Hearing Officer on dates that all motions, witness and exhibit lists and direct testimonies and pre-hearing statements to be submit on certain date in October and also in DOC 281 at page 5 of the Minute Order and/or Order contains no reasoned explanation as to how the issues presented by the Petitioner as well as other parties and are excluded from the issues to be heard at the hearing [DOC 90, 258, and 277]

Petitioner Motion for Extension of time for Filing documents as such, extending time of Motions for Reconsideration to 5 business days (previously stated by HO) change from October 13, 2016 to October 17, 2016 and also extension of time to submit witness, exhibit lists, and written direct testimonies and pre-hearing statement to change from October 11, 2016 to October 21, 2016.

III. CONCLUSION

Due to the above issues as a pro se without an attorney and representing to represent the Petitioner and interests of this matter, I will need reasonable extension of time and that to ensure my due process of law is excised. (14th Amendment) Therefore this matter has shown good cause to grant this Motion

Kailua Kona HI., October 4, 2016

William Freitas
Petitioner

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Use Application (CDUA) HA-3568 For the)
Thirty Meter Telescope at the Mauna Kea)
Science Reserve, Ka'ohe Mauka, Hamakua,)
Hawai'i TMK(3)4-4-015:009) Certificate of Service
)
)

CERTIFICATE OF SERVICE

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

Michael Cain
OCCL
1151 Punchbowl, Rm131
Hon. HI 96813
michael.cain@hawaii.gov
Custodian of Records
(original digital copy).

Carlsmith Ball LLP
Ian Sandison, Tim Lui-Kwan
John P. Manaut, Lindsay N.
McAneeley
isandison@carlsmith.com
jpm@carlsmith.com
lmcaneley@carlsmith.com
Counsel for the Applicant
UHH

Richard N. Wurdeman
RNWurdeman@RNWlaw.com
Counsel for the Petitioners
Mauna Kea Anaina Hou,
Clarence Kukauakahi Ching
Flores-Case, 'Ohana, Deborah

Richard L Deleon
kekaukiki@msn.com

Mehana Kihoi
uhiwai@live.com

C.M. Kaho'okahi
Kanuha
Kahookahi@gmail.com

Joseph Kaulii Lindsey
Camara
kualiic@hotmail.com

Torkildson, Katz,
Moore, Hetherington
Harris Attn: Lincoln
S.T. Ashida
lisa@torkildson.com

J. Leina'ala Sleightholm
leina.ala.s808@gmail.com

Lanny Alan Sinkin

Glen Kila
makakila@gmail.com

Dwight J. Vicente
2608 Ainaola Dr.
Hilo, Hawaiian
Kingdom/mail

Brannon Kamahana
Kealoha
brannonk@hawaii.edu

Cindy Freitas
hanahanai@hawaii.rr.com

William Freitas
Pohaku 7@vahoo.com

Tiffnie Kakalia
tiffniekakalia@gmail.com

Maelani Lee
maelanilee@yahoo.com

Kalikolehua Kanaele

J. Ward, Paul K. Naves, and
Kahea: The Environmental
Alliance

Watanabe Ing LLP
J. Douglas Ing, Ross T.
Summer H. Kiawe
rshinyama@wik.com
douging@wik.com
TIO

David M Louie, ESQ
dml@ksglaw.com
Clifford K. Higa, EXQ
ckh@ksglaw.com
Nicholas R. Monlux, ESQ
nrm@ksglaw.com

Kobayashi Sugita & Goda LLP
Special Deputy Attorneys General for Attorney
General Douglas S. Chin The Department of
The Attorney General, and Deputy Attorneys
General in their Capacity as Counsel for
The Board of Land & Natural Resources and
Hearing Officer

lanny.sinkin@gmail.com
Rep. for The Temple of Lono

Stephanie-Malia: Tabbada
s.tabbada@hawaiiantel.net

Wilma H. Holli
P.O. Box 368
Hanapepe, HI 96716
Witness List

Moses Kealamakia Jr.
mkealama@yahoo.com
Witness List

Patricia P. Ikeda
peheakeanila@gmail.com

akulele@yahoo.com

Harry Fergerstrom
P.O. 951
Kurtistown, HI 96760

Ivy McIntosh
3popoki@gmail.com
Witness List

Crystal F. West
crystalinx@gmail.com
Witness List

Signature: William Freitas

Name (Print):

Date: October 4, 2016