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As provided for in Minute Orders Nos. 16 and 21, KAHEA wishes to cross-examine all other parties' witnesses, including, but not limited to the witnesses of Applicant the University of Hawai'i at Hilo (UHH), the TMT International Observatory, Inc. (TIO), and Perpetuating Unique Educational Opportunities (P.U.E.O.) as designated below:

A. Designation of UHH Witnesses for Cross-Examination, as well as any other witnesses called by UHH.

1. Perry J. White
2. James T. Hayes
3. Clifford Smith
4. Robert McLaren
5. Chad Kalepa Babayan
6. Gunther Hasinger
7. Fritz Klasner
8. Stephanie Nagata
9. Jesse Eiben
10. Tom Nance
11. Richard Nees
12. Sara Collins
13. Walter M. Heen
14. Wallace A. Ishibashi, Jr.
15. David Lassner

B. Designation of TIO Witnesses for Cross-Examination, as well as any other witnesses called by TIO:

1. Edward C. Stone
2. Gary H. Sanders
3. Michael Bolte
4. David Callies
5. James E. Halstrom
6. Dr. Heather Kaluna
7. Naea Stevens
8. Amber Imai-Hong
9. Robert B. Rechtman
10. Paul Coleman.

C. Designation of P.U.E.O. Witnesses for Cross-Examination, as well as any other witnesses called by P.U.E.O.:

1. Shadd Keahi Warfield
2. Richard Ha
3. Elroy Osorio
4. William Brown

5. Patrick Kahawaiola'a
6. "All other witnesses named by other parties"
7. "Rebuttal witnesses"

D. Designation of Maunakea Anaina Hou Witnesses for Cross Examination

1. Kealoha Pisciotta
2. E. Kalani Flores
3. Clarence Kūkauakahi Ching
4. B. Pualani Case

II. Designation of Rebuttal Witness Evidence

KAHEA may call rebuttal witnesses to counter evidence received at the contested case proceedings and the content of direct witness testimonies. HRS §91-10(3) provides, "Every party shall have the right to conduct such cross-examination as may be required for a full and true disclosure of the facts, and shall have the right to submit rebuttal evidence." See *also* HAR §13-1-32(g) (providing for parties' right to submit rebuttal evidence). KAHEA submits its preliminary list of potential rebuttal witnesses, reserving the right to submit other appropriate rebuttal evidence after arguments and testimonies are disclosed during the hearing.

Reserving the right to identify other rebuttal witnesses as needed, KAHEA designates the following as rebuttal witnesses.

	Name of Witness	Witness Designation	Description of Area of Testimony
B.01	Kealoha Pisciotta	Direct & Rebuttal	Cultural practices, histories, desecration, impacts on environment
B.02	E. Kalani Flores	Direct & Rebuttal	Traditional & customary practices connected to Mauna a Wakea; cultural and natural resources impacts; mitigation
B.03	Marti Townsend, Esq.	Direct & Rebuttal	Environmental impacts, histories, mitigation
B.04	Maile Taualii	Direct & Rebuttal	Health impacts of Mauna Kea desecration on Hawaiians
B.05	Manulani Aluli-Meyer, Ed.D.	Direct & Rebuttal	Hawaiian education
B.06	Ku Kahakalau, Ph.D.	Direct & Rebuttal	Indigenous education, cultural impacts

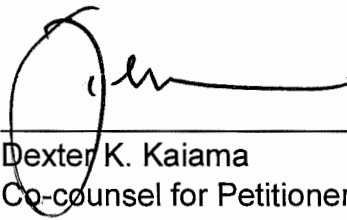
B.07	Jon Osorio, Ph.D.	Direct & Rebuttal	Cultural impacts, histories, and mitigation
B.08	Kehaunani Abad, Ph.D.	Direct & Rebuttal	Archaeological significance of Mauna Kea
B.09	David James Vicente, M.S.	Direct & Rebuttal	
B.10	Eric Hansen, M.S.	Direct & Rebuttal	Natural resource management and conservation on Mauna Kea
B.11	Kuulei Kanahele	Direct & Rebuttal	Hawaiian cultural perspective on the importance of water on Mauna Kea
B.12	Peter Mills, Ph.D.	Direct & Rebuttal	Mauna Kea historic properties & cultural resources
B.13	Candace Fujikane, Ph.D.	Direct & Rebuttal	Cultural impacts, histories, and mitigation
B.15	Laulani Teale	Direct & Rebuttal	Impacts on public health, welfare, safety; cultural practices of la'au lapa'au
B.17	Deborah J. Ward	Direct & Rebuttal	Natural resource impacts, management
B.18	Paul K. Neves	Direct & Rebuttal	Cultural impacts, practices, and mitigation
B.19	Clarence Kūkauakahi Ching	Direct & Rebuttal	Cultural impacts, practices, and mitigation
B.20	Kamanamaikalani Beamer, Ph.D.	Direct & Rebuttal	Hawaiian cultural significance of water; overview of Mahele and native tenant rights
B.21	B. Pualani Case	Direct & Rebuttal	Traditional & customary practices connected to Mauna a Wakea
B.23	Kapulei Flores	Direct & Rebuttal	Traditional & customary practices connected to Mauna a Wakea
B.24	Ruth Aloua, M.A.	Direct & Rebuttal	Historic properties, cultural resources, traditional & customary practices connected to Mauna a Wakea

B.25	Diana LaRose	Direct & Rebuttal	Indigenous Spirituality
	Jesse Potter/ Pōhāhā I ka Lani	Rebuttal	Educational impacts of the TMT
	Narissa Spies, M.S.	Rebuttal	Educational benefits proposed as "mitigation" and public welfare
	Keomailani Von Gogh	Rebuttal	Cultural practices, histories, desecration, impacts on environment; collection of water
	Hāwane Rios	Rebuttal	Traditional & customary practices connected to Mauna a Wakea
	Davianna Macgregor	Rebuttal	The exercise of customary and traditional practices and the protection of these customs and practices under US and Hawaii law
	David Kimo Frankel, Esq.	Rebuttal	Land use laws and protections for environment and native Hawaiian rights
	Brian Cruz	Rebuttal	Preparation of the cultural impact assessment Exhibits B.34 and B.44

DATED: Kailua, Hawaii, 10/14/16



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The Hawaiian Environmental Alliance,
a domestic non-profit Corporation



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The Hawaiian Environmental Alliance,
a domestic non-profit Corporation

BOARD OF LAND AND NATURAL RESOURCES

STATE OF HAWAII

In the Matter of:) Case No. BLNR-CC-16-002
)
A Contested Case Hearing Re:) **CERTIFICATE OF SERVICE**
Conservation District Use Permit)
(COUP) HA-3568 for the Thirty Meter)
Telescope at the Mauna Kea Science)
Reserve, Kaohe Mauka, Hamakua)
District, Island of Hawai'i, TMK (3) 4-4-015:009)
_____)

CERTIFICATE OF SERVICE

We hereby certify that a copy of the foregoing was served on the following via email unless otherwise specified below:

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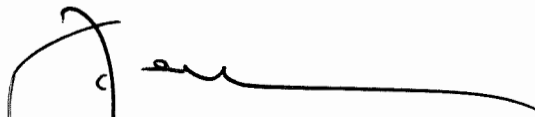
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