

**Tiffnie Kakalia**  
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**BOARD OF LAND AND NATURAL RESOURCES**  
**STATE OF HAWAII**

<b>In the Matter of:</b>	)	<b>Case No. BLNR-CC-16-002</b>
<b>A Contested Case Hearing</b>	)	
<b>Re</b>	)	
<b>Conservation District Use</b>	)	<b>STATEMENT OF TIFFIE KAKALIA</b>
<b>Permit</b>	)	<b>DESIGNATING WITNESSES; CERTIFICATE OF</b>
<b>(COUP) HA-3568 for the</b>	)	<b>SERVICE</b>
<b>Thirty Meter</b>	)	
<b>Telescope at the Mauna Kea</b>	)	
<b>Science</b>	)	<b>Hearing Officer: Riki J. Amano.</b>
<b>Reserve, Kaohe Mauka,</b>	)	
<b>Hamakua</b>	)	
<b>District, Island of Hawai‘i,</b>	)	
<b>TMK (3) 4-4-015:009</b>	)	
	)	

**STATEMENT OF TIFFNIE KAKALIA DESIGNATING WITNESSES**

I, Tiffnie Kakalia, respectfully submits this Statement Designating Witnesses pursuant to Minute Order No. 16, filed August 22, 2016 (Document No. 238), Minute Order No. 21, filed October 11, 2016 (Document No. 244), Hawaii Revised Statutes (HRS) § 91-10, Hawaii Administrative Rule (HAR) §13-1-32, and oral orders issued by the Hearing Officer at the prehearing conference on October 3, 2016 in Hilo, Hawai‘i.

**I. Designation of Witnesses for Cross-Examination**

As provided for in Minute Orders Nos. 16 and 21, I wish 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 all UHH Witnesses for Cross-Examination included on their Final Witness List, as well as any other witnesses called by UHH.
- B. Designation of all TIO Witnesses for Cross-Examination included on their Final Witness List, as well as any other witnesses called by TIO:

C. Designation of all P.U.E.O. Witnesses for Cross-Examination included on their Final Witness List, as well as any other witnesses called by P.U.E.O.:

D. Designation of other parties' Witnesses for Cross-Examination included on their Final Witness List, as well as any other witnesses that may be called.

## II. Designation of Rebuttal Witness Evidence

I 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). I submit my 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, I designate the following as rebuttal witnesses.

DATED: Hilo, Hawai'i, October 14, 2016

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Tiffnie Kakalia 10/14/16