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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,
Hāmakua, Hawai'i, TMK (3) 4-4-015:009

BLNR Contested Case HA-16-02

**JOSEPH KUALII LINDSEY CAMARA'S MOTION TO
ADMIT EXHIBITS AND WRITTEN DIRECT
TESTIMONY INTO EVIDENCE: MEMORANDUM IN
SUPPORT OF MOTION CERTIFICATE OF SERVICE**

**JOSEPH KUALII LINDSEY CAMARA'S MOTION TO ADMIT EXHIBITS AND WRITTEN
DIRECT TESTIMONY INTO EVIDENCE; MEMORANDUM IN SUPPORT OF MOTION;
CERTIFICATE OF SERVICE**

Joseph Kualii Lindsey Camara, party, hereby submit my Motion to Admit Exhibits and Written Direct Testimony into Evidence ("Motion"). This motion is made pursuant to Hawaii administrative rules ("HAR") 13-5-32, 34, 35.

Me ke aloha aina,

Joseph K. L. Camara _____

Hilo, Hawaii _____

Received
Office of Conservation and Coastal Lands
Department of Land and Natural Resources
State of Hawaii
2017 March 7 256 am

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JOSEPH KUALII LINDSEY CAMARA'S
MEMORANDUM IN SUPPORT OF MOTION

MEMORANDUM IN SUPPORT OF MOTION

On March 2, 2017, Joseph Kualii Lindsey Camara, party, rested his case in the above entitled matter. Joseph Kualii Lindsey Camara now moves to admit into evidence the written direct testimony ("WDT") of his witnesses and the exhibits introduced therein during the contested case hearing. The proposed evidence is in accordance with Hawaii Revised Statutes (HRS 91-10 governing the admissibility of evidence in agency proceedings.

The evidence presented by Joseph Kualii Lindsey Camara is relevant, material and is not privileged or unduly repetitious, and is therefore admissible under the liberal standard of admissibility of evidence in administrative hearings. Therefore, pursuant to HRS 91-10, Ching moves to admit into the record the following testimony and documentary evidence:

WRITTEN DIRECT TESTIMONY/OPENING STATEMENT

Exhibit #	Description
Submitted as attachment to this motion	Joseph Kualii Lindsey Camara WDT (revised and submitted 3/7/17)
Witness Statement 2	Mililani B. Trask WDT
Pre hearing Statement	Joseph Kualii Lindsey Camara Opening Statement

EXHIBITS

Exhibit #	Description
H-1	Testimony and Pictures of Mauna Kea Rangers Documenting Desecration
H-2	UNDRIP 2007
H-3	UN Sacred Site Intervention
H-4	UN Rulings
H-5	Mauna Kea Aquifer Study
H-6	Kahea CDUA Testimony on Behalf of its Members
H-7	Apapalani Map
H-8	Linda Lindsey Kaapuni Mookuauhau
H-9	Credentials and Supporting Documents of Luana Busby Neff
H-10	2013 Hawaii Revised Statutes Title 12 Conservation and Resources 171. Public Lands, Management and Disposition of 171-17 Appraisals
H-11	2009 Comprehensive Management Plan (cross referenced with UHH Exhibit A 009)
H-12	Permanent Forum on Indigenous Issues, Report on the fifteenth session (9-20 May 2016)

H-13	May 18, 2016 correspondence between Trask, Trask, Kualii and Ruddle & Kahu Ku Manu
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Joseph Kualii Lindsey Camara's WDT has been minimally revised to correct grammatical errors before being moved to the permanent record. The content of the revised document is essentially the same as the WDT previously submitted and on file.

Moreover, Joseph Kualii Lindsey Camara reserves the right to supplement this motion based on additional evidence introduced during cross-examination and or rebuttal. Based on the foregoing, Joseph Kualii Lindsey Camara respectfully requests that the Hearing Officer grant this Motion.

Me ke aloha aina,

Joseph K. L. Camara _____ Hilo, Hawaii _____

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Document title:

I.

II. CERTIFICATE OF SERVICE

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

(1)

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