

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'oho Mauka,
Hāmakua, Hawai'i, TMK (3) 4-4-015:009
BLNR Contested Case HA-16-02

Kalikolehua Kanaele MOTION FOR ADMITTANCE OF EXHIBITS
AND PREHEARING STATEMENT AS MY WRITTEN DIRECT
TESTIMONY INTO EVIDENCE ("MOTION") MEMORANDUM IN
SUPPORT OF MOTION, CERTIFICATE OF SERVICE

Kalikolehua Kanaele MOTION FOR ADMITTANCE OF EXHIBITS
AND PREHEARING STATEMENT AS MY WRITTEN DIRECT
TESTIMONY INTO EVIDENCE ("MOTION")

COMES NOW PETITIONER; Kalikolehua Kanaele, party, hereby submit my Motion to Admit Exhibits and PreHearing Statement as my Written Direct Testimony into Evidence ("Motion"). This motion is made pursuant to Hawaii administrative rules ("HAR") 13-5-32, 34, 35.

Aloha Aina,

Kalikolehua Kanaele March 9th, 2017 Hilo, Hawaii

Received
Office of Conservation and Coastal Lands
Department of Land and Natural Resources
State of Hawaii
2017 March 8 2:31 pm

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Kalikolehua Kanaele
MEMORANDUM IN SUPPORT OF MOTION

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On March 4, 2017, Kalikolehua Kanaele, rested his case in the above entitled matter. Kalikolehua Kanaele 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 Kalikolehua Kanaele 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, Kanaele moves to admit into the record the following testimony and documentary evidence:

WRITTEN DIRECT TESTIMONY/OPENING STATEMENT

Exhibit # Description

Moreover, Kalikolehua Kanaele reserves the right to supplement this motion based on additional evidence introduced during cross-examination and or rebuttal. Based on the foregoing, Kalikolehua Kanaele respectfully requests that the Hearing Officer grant my request YAY.

PREHEARING STATEMENT AS MY WRITTEN DIRECT TESTIMONY

Kalikolehua Kanaele PRE HEARING STATEMENT AS WRITTEN DIRECT TESTIMONY
FOUND IN CONTESTED CASE DOCUMENTS

CARROLL WDT

CARROLL WDT AMENDED

EXHIBITS

M-A Science, culture clash over sacred mountain

M-I-2 StarWars Telescope & Lawyers Caught In Theft Schemes: Third Circuit Court Officers
Stanley Roehrig

M-I-5 Emails offer insight into state's response to protests

M-4 "Division 1. Government ... "

M-E Challenging the member polling process on Rail by Stuart Scott

M-4 TMT attorney had inside track on legal issues

M7 Treaty and draft proposal, Hawaiian Kingdom 1835 Waitangi Treaty