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BOARD OF LAND AND NATURAL RESOURCES

FOR THE STATE OF HAWAI'I

IN THE MATTER OF

) Case No. BLNR-CC-16-002

)

) **ERRATA RE:**

A Contested Case Hearing Re Conservation;
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

) **CINDY FREITAS MOTION IN**
) **OPPOSITION TO THE ADMISSION**
) **OF EXHIBITS A-141, A-142, A-143,**
) **A-45, A-45a, A-41 AND WITNESS**
) **TESTIMONY SARA COLLINS, PH.D**
) **DAVID LASSNER, JESSE ALAN**
) **EIBEN, PH.D, DENNIS CHARLES**
) **GOSSER AND PAT**
) **KAHAWAIOLOA'A; CERTIFICATE**
) **OF SERVICE**

CINDY FREITAS MOTION IN OPPOSITION TO THE ADMISSION OF
EXHIBITS A-141, A-142, A-143, A-45, A-45a, A-41 AND WITNESS TESTIMONY
SARA COLLINS, PH.D, DAVID LASSNER, JESSE ALAN EIBEN, PH.D,
DENNIS CHARLES GOSSER AND PAT KAHAWAIOLOA'A

I Cindy Freitas, ("Petitioner") Motion in Opposition to the Admission of Exhibits as follows:

Ex. No Submitted	Description
Submitted on 10/11/16	Sara Collins, Ph.D. WDT
Submitted On 10/11/16	David Lassner WDT
Submitted	Jesse Alan Eiben Ph.D. WDT

Received

Office of Conservation and Coastal Lands
Department of Land and Natural Resources
State of Hawaii
2017 March 16 4:21 pm

on 10/11/16	
Submitted on 2/27/17	Gosser Written Rebuttal Testimony
Submitted on 10/11/16	Patrick Kahawaiola'a WDT
A-141 Submitted on 2/24/17	Historic Preservation Mitigation Plan in support of Construction of the Thirty Meter Telescope in the Astronomy Precinct on Mauna kea
A-142 Submitted On 2/24/17	Final Report Archaeological Monitoring Plan in Support of Construction of the Thirty Meter Telescope in the Astronomy Prescient on Mauna Kea
A-143 Submitted on 2/24/17	Correspondence from State Historic Preservation Division to Pacific Consulting Service April 24, 2013
A-45 Submitted on 10/11/16	Sara Collins, Ph.D. Curriculum Vitae
A-45a Submitted on 3/01/17	Gosser Curriculum Vitae
A-41 Submitted on 10/11/16	Jesse Alan Eiben Ph.D. Curriculum Vitae

On many occasions repeatedly by the Hearing Officer stated that, "if the witness dose not testify then the Written Testimony will not be allowed". Therefore as required by the Hearing Officer guidelines.

University of Hilo at Hilo ("UHH") Motion to Supplemental to Admit Exhibit A-141, A-142 and A-143 on March 9, 2017 as DOC 506 should not be accepted in to evidence due to the fact I did not have an opportunity to cross-examine the exhibit though Mr. Gosser or Ms. Collins.

CONCLUSION

Therefore with good cause in this matter the Petitioner should be Granted.

Kailua Kona HI., March 16, 2017

A handwritten signature in dark ink, appearing to read 'Cindy Freitas', followed by the letters 'TDC' in a stylized, cursive font.

Cindy Freitas Petitioner

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 of the Mauna
Kea Science Reserve, Ka'ohe Mauka,
Hamakua, Hawaii, TMK (3) 4-4-015.009

BLNR Contested
Case HA-16-02
Document Title

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above reference document was served upon the
Following parties by the means of email and or mailed and electronically filed.

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