

TORKILDSON KATZ
A Law Corporation

NEWTON J. CHU 6537-0
(Newton.Chu@torkildson.com)
LINCOLN S. T. ASHIDA 4478-0
(Lincoln.Ashida@torkildson.com)
120 Pauahi Street, Suite 312
Hilo, HI 96720
Telephone: (808) 961-0406
Facsimile: (808) 961-3815

Attorneys for PERPETUATING UNIQUE
EDUCATIONAL OPPORTUNITIES (“PUEO”)

BOARD OF LAND AND NATURAL RESOURCES

STATE OF HAWAII

IN THE MATTER OF

The Petition Of Mauna Kea Hui for a
Declaratory Order Filed May 24, 2021.

Case No. HA-22-02

PERPETUATING UNIQUE EDUCATIONAL
OPPORTUNITIES’ (“PUEO”) JOINDER TO
RESPONDENT TMT INTERNATIONAL
OBSERVATORY LLC’S “PROPOSED
FINDINGS OF FACT, CONCLUSIONS OF
LAW, AND DECISION AND ORDER, RE:
MAUNA KEA HUI’S MOTION TO REOPEN
HEARING TO HEAR MOTION TO
CONFIRM NON-COMPLIANCE WITH
CONDITION NO. 4, OR, ALTERNATIVELY,
PETITION FOR DECLARATORY ORDERS
CONCERNING THE SAME” DATED
DECEMBER 20, 2023; CERTIFICATE OF
SERVICE

**PERPETUATING UNIQUE EDUCATIONAL OPPORTUNITIES’ (“PUEO”) JOINDER
TO RESPONDENT TMT INTERNATIONAL OBSERVATORY LLC’S
“PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW, AND DECISION AND
ORDER, RE: MAUNA KEA HUI’S MOTION TO REOPEN HEARING TO HEAR
MOTION TO CONFIRM NON-COMPLIANCE WITH CONDITION NO. 4,
OR, ALTERNATIVELY, PETITION FOR DECLARATORY ORDERS CONCERNING
THE SAME” DATED DECEMBER 20, 2023**

Received
Office of Conservation and Coastal Lands
Department of Land and Natural Resources
State of Hawaii
Dec 21, 2023

PERPETUATING UNIQUE EDUCATIONAL OPPORTUNITIES (“PUEO”), by and through their undersigned counsel, joins “PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW, AND DECISION AND ORDER, RE: MAUNA KEA HUI’S MOTION TO REOPEN HEARING TO HEAR MOTION TO CONFIRM NON-COMPLIANCE WITH CONDITION NO. 4, OR, ALTERNATIVELY, PETITION FOR DECLARATORY ORDERS CONCERNING THE SAME” dated December 20, 2023.

DATED: Hilo, Hawai`i, December 21, 2023.

TORKILDSON KATZ
A Law Corporation

/s/ Lincoln S. T. Ashida
NEWTON J. CHU
LINCOLN S. T. ASHIDA

Attorneys for PERPETUATING UNIQUE
EDUCATIONAL OPPORTUNITIES (“PUEO”)

BOARD OF LAND AND NATURAL RESOURCES

STATE OF HAWAII

IN THE MATTER OF

The Petition Of Mauna Kea Hui for a
Declaratory Order Filed May 24, 2021.

Case No. HA-22-02

CERTIFICATE OF SERVICE

RE: PERPETUATING UNIQUE
EDUCATIONAL OPPORTUNITIES'
("PUEO") JOINDER TO RESPONDENT
TMT INTERNATIONAL OBSERVATORY
LLC'S "PROPOSED FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND DECISION
AND ORDER, RE: MAUNA KEA HUI'S
MOTION TO REOPEN HEARING TO HEAR
MOTION TO CONFIRM NON-
COMPLIANCE WITH CONDITION NO. 4,
OR, ALTERNATIVELY, PETITION FOR
DECLARATORY ORDERS CONCERNING
THE SAME" DATED DECEMBER 20, 2023

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the above-described document was duly served upon the following parties, by email, on December 21, 2023:

Linda L.W. Chow
Lauren K. Chun
Deputy Attorneys General
Linda.L.Chow@hawaii.gov
Lauren.K.Chun@hawaii.gov
*Attorneys for the Board of Land
and Natural Resources*

Carrie K.S. Okinaga
University General Counsel
Gary Y. Takeuchi
Deputy General Counsel
Jesse K. Souki
Associate General Counsel
University of Hawai'i
gyt@hawaii.edu
souki@hawaii.edu

Harry Fergerstrom
hankhawaiian@yahoo.com

Richard L DeLeon
kekaukike@msn.com

Mehana Kihoi
uhiwai@live.com

C. M. Kaho'okahi Kanuha
kahookahi@gmail.com

Joseph Kualii Lindsey
Camara
kualiic@hotmail.com

Cindy Freitas
hanahanai@hawaii.rr.com

Tiffnie Kakalia
tiffniekakalia@gmail.com

Glen Kila
makakila@gmail.com

Dwight J. Vicente
dwrightjvicente@gmail.com

Brannon Kamahana Kealoha
brannonk@hawaii.edu

William Freitas
Pohaku7@yahoo.com

Michael Cain
Michael.cain@hawaii.gov
Custodian of the Records

*Attorneys for University of
Hawai'i, Hilo*

Richard Naiwieha Wurdeman
RNWurdeman@RNWLAW.com
Bianca Isaki
bianca.isaki@gmail.com
*Attorneys for the Mauna Kea
Hui*

Maelani Lee
maelanilee@yahoo.com

Lanny Alan Sinkin
lanny.sinkin@gmail.com
The Temple of Lono
Kalikolehua Kanaele
akulele@yahoo.com

E. Kalani Flores
Flores-Case 'Ohana
08ef80@gmail.com

Lincoln S.T. Ashida
Newton J. Chu
Torkildson, Katz, Moore, &
Harris
lsa@torkildson.com
njc@torkildson.com
*Attorneys for Perpetuating
Unique Educational
Opportunities (PUEO)*

The undersigned hereby further certifies that a hard copy of the foregoing document was
duly served upon the following parties, via U.S. Mail, postage paid, on December 21, 2023:

J. Leina'ala Sleightholm
P.O. Box 383035
Waikoloa, HI 96738

Stephanie-Malia Tabbada
P.O. Box 194
Naalehu, HI 96772

DATED: Hilo, Hawai'i, December 21, 2022.

TORKILDSON KATZ
A Law Corporation

/s/ Lincoln S. T. Ashida
NEWTON J. CHU
LINCOLN S. T. ASHIDA

Attorneys for PERPETUATING UNIQUE
EDUCATIONAL OPPORTUNITIES ("PUEO")