PUBLIC FIRST
LAW CENTER

November 4, 2024

VIA ELECTRONIC MAIL

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RE: Response to September 30, 2024 Order Inviting Public Comment on the Hawai`i Court Records Rules

Public First Law Center is a Hawai`i non-profit organization focused on solutions that promote responsiveness and transparency in government. We write to provide comments on the Hawai`i Court Records Rules (HCRR) with a focus on the process for sealing and unsealing records.

Over the years, Public First has encountered a variety of circumstances where further clarity in the HCRR could benefit the parties, the courts, and the public. We have also observed a misperception among practitioners about the relatively rare circumstances under which sealing is necessary and appropriate.

The Hawai`i Supreme Court recognizes that sealing court records requires special procedures when the public has a qualified constitutional right of access. *E.g.*, *Grube v. Trader*, 142 Hawai`i 412, 420 P.3d 343 (2018); *Oahu Public'ns Inc. v. Ahn*, 133 Hawai`i 482, 331 P.3d 460 (2014). Even when the constitutional presumption of access may not attach, the common law may require certain procedures to preserve a presumption of public access. *In re Estate of Campbell*, 106 Hawai`i 453, 106 P.3d 1096 (2005); *Honolulu Advertiser, Inc. v. Takao*, 59 Haw. 237, 580 P.2d 58 (1978); *accord United States v. Bus. of the Custer Battlefield Museum*, 658 F.3d 1188 (9th Cir. 2011). Basic sealing procedures can ensure that courts apply the correct standards and have information available to make specific findings, if necessary. More uniform procedures for unsealing motions also will assist courts that struggle with the current rules.

The following suggestions address revising the HCRR or otherwise handling court records. We outline ideas regarding sealing motions, unsealing motions, issues common to both sealing and unsealing, and other miscellanea. Public First is not familiar with all the policies, technological constraints, and other issues that impact the

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Judiciary's processes, so these suggestions provide only general principles. With more information, we could offer specific language.

Sealing Court Records

1. **Court records are not a general repository**. We strongly encourage keeping and emphasizing HCRR 8.2. Parties create unnecessary sealing problems for courts by filing potentially confidential information *that is not relevant to the proceedings*.

Procedures should require parties to redact—not move to seal—information that the party considers confidential when that information is not necessary for adjudication of any pending dispute. There is no reason to attach a 50+ page exhibit when the parties only need a judge to consider one paragraph on the second page. And in many cases, a judge does not need to have a record with a party's complete tax identification number.

Federal rules provide examples of this principle. *E.g.*, D. Haw. LR 56.1(b) ("Documents referenced in the concise statement may be filed in their entirety only if a party concludes that the full context would be helpful to the court."); *see also* Fed. R. Civ. P. 5.2(a) (placing obligation on parties to redact certain personal information). An emphasis on redaction over sealing will better protect potentially confidential information and reduces the inclusion of irrelevant information in court files.

Regarding redaction of unnecessary information, we also encourage maintaining and streamlining the principles in HCRR 9 that require parties redact "personal information" specified in HCRR 2.19. In most instances, "personal information" is not relevant to proceedings and should be omitted completely from the record.

The current rules lead to confusion with parties filing confidential fly sheets when not required, as well parties not filing fly sheets when required. We suggest eliminating the fly sheet process and providing that if "personal information" is necessary for adjudication, the filing party may submit a sealed unredacted version with the redacted document. A revised rule should also permit different procedures by court order.[1]

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[1] Fed. R. Civ. P. 5.2 requires redaction of specified personal identifiers "[u]nless the court orders otherwise." As an example, a party may not wish to redact to the full extent required by the HCRR, *e.g.*, *Navahine F. v. Dep't of Transp.*, No. 1CCV-22-631 Dkt. 48 ("To date, the Youth Plaintiffs' filings in this case have identified the Youth Plaintiffs by first name and last initial only, which is also how individual Youth Plaintiffs have identified themselves in public statements and forums on this case.").

2. **Motions to seal must be publicly filed**. In *Grube*, the Hawai`i Supreme Court explained that requests for sealing must be publicly docketed. Public filing is necessary to provide general notice that a party seeks to seal records and the basis for that request to seal, so that members of the public have a "meaningful opportunity" to object, when appropriate, to the party's reasons for sealing.

But a party who moves to seal is not required to publicly file evidence supporting the motion when disclosing such evidence would defeat the purpose of the motion to seal. *E.g.*, *Grube*, 142 Hawai`i at 423 n.13, 420 P.3d at 354 n.13; *accord In re Copley Press, Inc.*, 518 F.3d 1022, 1028-29 (9th Cir. 2008). Thus, the HCRR should require that a party seeking to seal court records must make a publicly filed motion to seal, but permit a sealed supplement—if necessary—for confidential information, including submission of the proposed sealed document.

The sealed supplement and proposed sealed document should be submitted to the court in a manner that allows the party to withdraw the filing and remove it from the court files if the motion to seal is denied. *Grube*, 142 Hawai`i at 423 n.13, 420 P.3d at 354 n.13 ("In the event the motion to seal is denied, the party may request to withdraw the supporting evidence prior to disclosure.").

For example, the HCRR could require that a party specify in the motion to seal whether the sealed supplement and proposed sealed document will be withdrawn if the motion to seal is denied. If the judge grants the motion to seal, the "seal" flag remains in place. If the judge denies the motion to seal, depending on the party's election in the motion to seal, the "seal" flag would be removed (documents not withdrawn) or the docket entries would be replaced with a minute entry referencing the withdrawal and removing all access to the documents.[2]

3. **Interested persons must be provided notice of motions to seal**. In *Ahn*, the Hawai`i Supreme Court explained the importance of notice of motions to seal, including individual (not general) notice to interested persons when practicable. *Ahn*, 133 Hawai`i at 497-98, 331 P.3d at 475-76.

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[2] A party intending to challenge the denial of a motion to seal would be able to move for a stay of the trial court's decision to preserve the record for a challenge. As part of the analysis for a stay, the trial court could weigh the balance of irreparable damage and public interest if the public is denied access to timely information of judicial significance. *Grube*, 142 Hawai`i at 428 n.21, 420 P.3d at 359 n.21.

> All too often, parties to the litigation are either indifferent or antipathetic to disclosure requests. This is to be expected: it is not their charge to represent the rights of others. However, balancing interests cannot be performed in a vacuum. Thus, providing the public notice and an opportunity to be heard ensures that the trial court will have a true opportunity to weigh the legitimate concerns of all those affected by a closure decision.

Id. at 498, 331 P.3d at 476 (quoting *Phoenix Newspapers*). Consistent with the observations in *Ahn*, the HCRR should require that a motion to seal attest to efforts made to individually notify members of the public who previously objected to a motion to seal in the case or who requested "extended coverage" pursuant to RSCH 5.1 in the case. *Id.* at 497 & n.19, 331 P.3d at 475 & n.19.

An ideal solution would leverage the JEFS architecture to automate notice. A technological solution, for example, could modify JEFS to allow subscribers and users the ability to monitor cases—receiving notice of new filings—without making an appearance in the case. *Cf. Oahu Public'ns, Inc. v. Takase*, 139 Hawai`i 236, 247 n.15, 386 P.3d 873, 884 n.15 (2016) ("We recognize that members of the media that are not parties to a proceeding may not be on the list of recipients receiving electronic service of documents in a given case and may, therefore, not receive automatic notification of a court's order regarding sealing."). In this way, most interested persons would receive contemporaneous notice of motions to seal in the same way as parties. Technological solutions must be carefully planned; for example, with the Judiciary's recent implementation of click-through document access from e-mail notices, e-mail notices for non-parties would need to be handled differently to ensure those individuals do not inadvertently gain access to sealed filings.

4. **Parties must consider redaction as an alternative to complete sealing**. The Hawai`i Supreme Court has consistently recognized in *Ahn*, *Takase*, and *Grube* that redaction minimizes the intrusion on any public right of access to court records. Parties cannot seal an entire brief because one line refers to a potentially confidential exhibit. To ensure that parties consider redaction, the HCRR should require that parties file a redacted version of proposed sealed documents or explain why such filing is not possible.

The timing of a redacted filing is critical. Members of the public cannot effectively evaluate a party's sealing claims without knowing the extent of redactions. A party claiming trade secrets, for example, may not draw any objection if it only redacts one

line of text, but may be challenged if redacting half a memorandum of law, even though the purported justification is the same. The HCRR should require filing of a redacted version within a day or two of the motion to seal, so that the redacted version may be considered in advance of any deadline to oppose the motion to seal.

5. **Motions to seal must address specific issues**. When the constitutional or common law right of public access applies to a particular proceeding, a party that seeks to seal a document has the burden to overcome the presumption of public access. To assist parties, the HCRR can identify what parties must include in a motion to seal to ensure that the court has the information necessary to analyze a request for sealing.

a. The applicable standard. Different standards for sealing may apply depending on the nature of the proceeding.

b. Facts that justify sealing. Sealing is a fact-specific analysis. Parties must present sufficient facts in the motion to seal, without disclosing confidential information, to permit the public an opportunity to meaningfully respond.

c. Efforts to notify interested persons. Parties must certify efforts to notify known persons (prior objections to sealing, extended coverage) with a potential interest in the motion to seal.

d. Filing of redacted version. Parties must certify that a redacted version of the proposed sealed document has been, or will be expeditiously, filed with the motion to seal or explain why a redacted version is not possible.

e. Withdrawal of document. Parties must specify whether the proposed sealed document will be withdrawn if the motion to seal is denied.

Unsealing Court Records

6. **Motions to unseal must be publicly filed**. Persons who file motions to unseal court records are exercising either constitutional or common law rights of the general public. Those individuals are not seeking and should not be provided access to non-public information. Public First has encountered multiple instances in which the trial court treats the motion to unseal as confidential or provides confidential information to the person who filed the motion to unseal. These situations create uncertainty about whether the disclosed information is sealed or public and, in some instances, have led the trial courts to impose express or implied gag orders on the

person who filed the motion to unseal. Absent rare extremes, courts should not expect confidentiality from a member of the public who makes a motion to unseal. To ensure a public process, the HCRR should clearly state that motions to unseal and related filings must be publicly filed, subject to the same caveats above for a sealed supplement filed by the parties to the case, if necessary, in opposing the motion.

7. **Method of filing motions to unseal should be clarified**. HEFSR 2.2 provides: "Unless otherwise expressly provided in these rules or in exceptional circumstances that prevent a JEFS User from filing electronically, a JEFS User shall file each document as a PDF document through JEFS for docketing and storage in JIMS . . . ." HCRR 10.4 provides: "Unless authorized by a court, an attorney shall not use the JIMS/JEFS database to gain access to confidential information under seal in cases in which the attorney is not a party or an attorney of record." For persons moving to unseal court records, these rules create a problem because, under the Judiciary's current JEFS infrastructure, if a person electronically files a motion to unseal as required by HEFSR, that person may gain access to information that is sealed—contrary to the HCRR.

One solution would be to provide a wider array of permissions for JEFS users (*e.g.*, filer, subscriber, intervenor). JEFS presumably could define who has access to sealed filings based on "Party Role" in the case. For example, even using the existing party roles, the "Other" category could be restricted from accessing sealed documents, or other party roles (*e.g.*, Non-Party) could be created to refine the access restrictions.[3]

Short of a technological solution, the HCRR could expressly provide that motions to unseal and replies may be filed conventionally. We file our motions to unseal conventionally to avoid unwarranted accusations of improper access. This process is not ideal. In the absence of other solutions, however, express permission for conventional filing should be recognized.

8. **"The Clerk shall notify all parties of the motion."** HCRR 10.10 currently provides that the clerk notifies parties that a motion to unseal has been filed. Public First, however, has encountered instances in which the trial court requires the movant to handle some or all of the notification, *e.g.*, when a defendant named in the caption has not been served by the plaintiff or a party is not represented by counsel. Providing *notice* based on publicly accessible information is a minimal imposition—although

[3] This solution would not work for "confidential" cases that are sealed in the entirety. In such instances, conventional filing remains a solution.

notably the courts are in the same, if not better, position as movant to provide such notice. More troubling, Public First has been required to formally serve parties, incurring hundreds of dollars in unrecoverable expense simply to have a motion to unseal heard by the court. Subject to the discussion below about internal court procedures and commentary, the HCRR should be revised to specify that formal service of process is not required; thus, even if a trial court enlists the assistance of the movant, a member of the public will not be required to incur what may be prohibitive amounts simply to exercise public rights.

9. **Method of service on movants should be clarified**. If, as discussed above, motions to unseal are conventionally filed, parties occasionally do not realize that the movant does not receive electronic notice of filings. Also, notices of relevant court orders, when physically mailed, routinely take up to a week to be delivered. To avoid these issues, the HCRR could provide that parties and the court must serve movants by electronic mail when feasible. *See* HEFSR 4.2 (attorneys who register as a JEFS User must consent to electronic notice in lieu of physical service).

10. **Members of the public must be permitted to file replies in support of motions to unseal**. HCRR 10.10 currently provides expressly for parties to file an opposition to a motion to unseal, but it does not address replies. For motions to unseal, the member of the public often lacks sufficient information to know why a document or, in some instances, an entire case is sealed. Accordingly, the parties' opposition may be the first explanation for the sealing. The only way to provide the public a meaningful opportunity to address the reasons for sealing and suggest alternatives to closure would be through a reply. The HCRR should expressly provide for a reply in support of motions to unseal.

<u>General Sealing/Unsealing Procedures</u>

11. **Deadlines should be clear**. The HCRR should consider the following deadlines:

- Filing of motion to seal a minimum number of days before an evidentiary hearing or, if no hearing, when the proposed sealed document is required to be filed (*e.g.*, a summary judgment filing deadline)[4]
- Filing of motion to unseal after clerk denies access

[4] For hearings, a motion to seal must be resolved before the substantive hearing. If it is not resolved, the trial court will not know whether the proposed sealed document is part of the record for consideration in the hearing or withdrawn.

- Filing of oppositions based on filing of motion[5]
- Filing of replies based on filing of oppositions
- Filing of challenges to Hawai`i Supreme Court

Any deadlines should be subject to modification by court order (*sua sponte* or on a motion to shorten time), so long as the court provides, when appropriate, constitutionally sufficient notice and opportunity for the public to be heard. Subject to such modification, the HCRR should provide at least 7-10 days for any action required of the public.

12. **Oppositions by any person**. Whether for motions to seal or unseal, the HCRR should provide that any person (not only parties) may file an opposition. More frequently, non-parties—*e.g.*, Public First—may oppose a motion *to seal* and should not be precluded from doing so by the HCRR. But we also have seen situations when a non-party may have a clear interest in opposing a motion *to unseal* (*e.g.*, a non-party whose records were obtained by subpoena and filed in an action). HCRR 10.10 currently only contemplates opposition to a motion to unseal by "any party".

13. **Hearings should be mandatory in limited circumstances**. In *Ahn*, the Hawai`i Supreme Court explained that if the public objects to sealing, "a hearing on the objections must be held as soon as possible. The hearing should provide a meaningful opportunity to address sealing the transcripts on the merits, or to discuss with the court viable alternatives." 133 Hawai`i at 507, 331 P.3d at 485. Absent objections after sufficient notice, a hearing should not be required. Thus, the HCRR should treat motions to seal or unseal as non-hearing motions for briefing purposes and provide for a hearing only if someone files an opposition or the court shortens the period for opposition. This would promote judicial efficiency and conserve party resources.

14. **Any hearing must be public**. Again, motions to seal and unseal are generally public proceedings. There may be limited circumstances—*e.g.*, to address matters discussed in sealed supplements—when a hearing on a motion may be closed. But trial courts occasionally exclude the public from hearings when only discussing public filings, or in one instance when ruling on the pending motion. The HCRR should

[5] HCRR 10.10 currently provides for filing of oppositions based on the clerk's notice. For a variety of reasons, that 10-day deadline is more observed in the breach than its adherence. A deadline based on filing of the motion to unseal—subject to modification by the court for special circumstances—would be more efficient.

clearly state that motions to seal and unseal shall be publicly heard, subject to caveats for partial closure to discuss a sealed supplement.

15. **Stipulations, including blanket protective orders, are not relevant to sealing court records**. As the Hawai`i Supreme Court observed in *Grube* and *Ahn*: "All too often, parties to the litigation are either indifferent or antipathetic to disclosure requests." (quoting *Phoenix Newspapers*). And outside the context of sealing proceedings, the supreme court has made clear that parties cannot stipulate to matters of public interest. *E.g.*, *State v. Tangalin*, 66 Haw. 100, 100-01, 657 P.2d 1025, 1026 (1983) ("It is well established that matters affecting the public interest cannot be made the subject of stipulation so as to control the court's action with respect thereto."); *accord LC v. MG*, 143 Hawai`i 302, 320, 430 P.3d 400, 418 (2018) ("[P]arty agreement as to a question of law is not binding on this court, and does not relieve us from the obligation to review questions of law de novo."). Based on similar principles, federal courts routinely reject stipulations and blanket protective orders as a basis for sealing. *E.g.*, *Union Oil Co. v. Leavell*, 220 F.3d 562, 567 (7th Cir. 2000) (rejecting argument that the sealing party should not be forced to sacrifice the benefit of the bargain to seal); *see also Foltz v. State Farm Mut. Auto Ins. Co.*, 331 F.3d 1122, 1136 (9th Cir. 2003) (common law presumption of public access is not rebutted by a stipulated protective order); *Citizens First Nat. Bank v. Cincinnati Ins. Co.*, 178 F.3d 943, 944 (7th Cir. 1999) ("[G]rant[ing] a virtual carte blanche to either party to seal whatever portions of the record the party wanted to seal . . . [is] improper."). Parties cannot stipulate away the public's constitutional and common law rights of access to court records.

Public First frequently encounters sealing motions or orders supported only by reference to a stipulation or blanket protective order. The HCRR should state clearly that stipulations or blanket protective orders are not a basis for sealing court records. If sufficient reasons exist for sealing records, those reasons can be stated in a motion to seal without relying on such documents. The federal local rules provide an example of model language: "A stipulation or blanket protective order that allows a party to designate matters to be filed under seal will not suffice to allow the filing of the matter under seal." D. Haw. LR 5.2(b).

16. **The exclusive review for challenging a sealing decision should be a petition for writ to the Hawai`i Supreme Court**. The Hawai`i Supreme Court has long held that a petition for writ is the appropriate means to challenge a decision granting or denying a motion to seal or unseal court records. *E.g.*, *Kema v. Gaddis*, 91 Hawai`i 200, 204-05, 982 P.2d 334, 338-39 (1999); *Gannett Pac. Corp. v. Richardson*, 59 Haw. 224, 227, 580 P.2d 49, 53 (1978). HCRR 10.15 thus provides: "A person or entity may seek review of a

denial or grant of access to a record by petitioning the supreme court, in accordance with Rule 21 of the Hawai`i Rules of Appellate Procedure."

Nevertheless, Public First has encountered instances in which parties have disregarded the HCRR and appealed adverse sealing decisions to the Intermediate Court of Appeals. *E.g.*, *Roy v. GEICO*, 152 Hawai`i 225, 524 P.3d 1249 (App. 2023). Appeals raise several concerns. The ICA applies a potentially more permissive standard of review (de novo). *See State v. Kealaiki*, 95 Hawai`i 309, 313 n.4 & 314 n.5, 22 P.3d 588, 592 n.4 & 593 n.5 (2001) (writs not intended to "cure a mere legal error" and may not be granted "even when the judge has acted erroneously"). An appeal—unlike a petition for writ—may divest the trial court of jurisdiction, delaying the underlying proceeding. *See Ogeone v. Au*, No. CAAP-18-449, 2023 Haw. App. LEXIS 391 at *8-9 (2023) ("We similarly conclude that the filing of the petition for writ of mandamus did not divest jurisdiction of the case from the Circuit Court."). The appeal also delays resolution of the access question to the detriment of the public. *See Grube*, 142 Hawai`i at 428 n.21, 420 P.3d at 359 n.21 ("Because the right of public access exists to provide members of the public with contemporary information about matters of current public interest so that they may effectively exercise their First Amendment rights, the belated release of records to which the public is rightfully entitled is not an adequate remedy."). And if appeals are an unwritten option in addition to petitions for writ, it creates confusion as to when the different avenues of review are appropriate and whether denial of a petition for writ is final or subject to later appeal.

The HCRR should clarify that a petition for writ is the exclusive method for review of sealing decisions.[6]

Miscellaneous Suggestions

17. **Evaluate whether certain cases or documents should be published on the Internet**. Public First is not aware of any case law that requires courts provide public access to court records specifically over the Internet. The Federal Rules of Civil

[6] Because a petition for writ should be the exclusive method for review, the Judiciary also may consider clarifying that its review is an exercise of supervisory jurisdiction. *See Gannett Pac.*, 59 Haw. at 226-27, 580 P.2d at 53; HRS § 602-4 ("The supreme court shall have the general superintendence of all courts of inferior jurisdiction to prevent and correct errors and abuses therein where no other remedy is expressly provided by law."). Such clarification would reduce the frequent *procedural* arguments raised by respondents.

Procedure recognize that certain categories of cases "are entitled to special treatment due to the prevalence of sensitive information and the volume of filings." Fed. R. Civ. P. 5.2 advisory committee notes (2007) (referencing social security appeals and immigration cases). In those cases, "[r]emote electronic access by nonparties is limited to the docket and the written dispositions of the court unless the court orders otherwise. The rule contemplates, however, that nonparties can obtain full access to the case file at the courthouse, including access through the court's public computer terminal." *Id.*

We would suggest that the Judiciary explore the possibility of using JIMS security levels and leveraging other technological solutions to do something similar for its court records. JIMS security levels already separately handle juvenile traffic cases, and there are at least six undefined security levels that could be utilized for other types of cases. If there are categories of Hawai`i cases that typically concern the filing of voluminous "sensitive information," Public First encourages a system similar to the federal rule that provides the public with Internet access to dockets, but access to the filed documents only through terminals at the courthouses; parties should continue to have Internet access to the documents.

Public First also encourages leveraging the available technology, if feasible, to allow designation of "sensitive" documents in otherwise public cases as available only at the courthouse terminals. The documents would not be sealed, but also would not be readily accessible to the public through the Internet. If such technological solutions exist, rules would need to address various issues, including who makes the designation, the criteria for designation, whether redacted versions must be published on the Internet, and who reviews disputes about designations. We suggest incorporating such "sensitive" document designation as an available alternative for trial courts to consider if sealing is not appropriate. *E.g.*, *Grube*, 142 Hawai`i at 427, 420 P.3d at 358 (courts must consider "less restrictive alternatives" to sealing that adequately protect compelling interests).

18. **Consider separating internal procedures and policies for court staff from rules that concern obligations of court participants**. Much of the HCRR focuses on actions of the clerks outside the context of particular proceedings. *Compare* HCRR 3 (clerk's general obligations to maintain court records), *with* HCRR 10.10 (clerk's obligations in responding to a request for access). It is exceptionally helpful for attorneys and others to be aware of clerk procedures—*i.e.*, Public First does not recommend making such policies less accessible. But those procedures do not need to be prescribed in the HCRR. The Judiciary should have more flexibility to modify those internal procedures and policies as needed. Focused on obligations of court participants, the HCRR will be

easier to understand and follow. And removing the court's internal procedures eliminates potential grounds for disputes over compliance. *See, e.g.*, U.S.C.A. Fed. Cir. Internal Operating Procedures (2022), *at* https://cafc.uscourts.gov/wp-content/uploads/RulesProceduresAndForms/InternalOperatingProcedures/IOPs-03012022.pdf ("Counsel should not cite the IOPs in appeal filings or rely on them to avoid controlling statutes or rules.").

19. **The HCRR should include commentary**. Commentary can assist practitioners in complying with the requirements of the HCRR. Providing non-binding information regarding a rule's rationale or related internal court policies would guide attorneys and others in understanding the practical application and expectations for the HCRR.

20. **Define the records not covered by the HCRR**. HCRR 1 provides: "These rules govern court and ALDRO records, unless otherwise specified." That broad definition could be read to include the Judiciary's various non-case records. To avoid confusion, the HCRR could further specify that the rules do not govern records covered by HRS ch. 92F, the public records law.[7]

21. **Streamline and restyle the rules**. The current HCRR is verbose. It also has redundant definitions and defined words that are not used in the HCRR itself. We would suggest that any effort to revise the HCRR should consider a comprehensive restyling. The Administrative Office of the U.S. Courts has some resources for restyling court rules at https://www.uscourts.gov/rules-policies/records-and-archives-rules-committees/style-resources.

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[7] It is unclear whether there are Judiciary records that fall outside both the HCRR and HRS ch. 92F.

Public First appreciates the Judiciary's invitation to submit suggestions regarding the HCRR. Again, given the nature of the call for comments, we have provided general principles, not specific language. In the future, if the Judiciary considers amendments, Public First welcomes the opportunity to work with other interested stakeholders to share experiences, research alternatives, and provide more tailored ideas.

Respectfully,

R. Brian Black