

Exhibit "32"

**Electronically Filed
FIRST CIRCUIT
1CCV-24-0000050
25-MAR-2025
11:05 AM
Dkt. 132 EXH**

Jon Kenney

Questions for Candidates

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Give each candidate 5 minutes to summarize their vision for the office and explain why they are qualified	1 2 3 4 (5)
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<p>Leadership: who will your administration be?</p> <ul style="list-style-type: none"> a. First Deputy b. Felony Supervisors c. Family Court d. District Court e. Appeals f. Administrative Assistants g. James Tabe and Lee Hayakawa – what are you going to do with them if they don't leave the office or retire? 	<p>1 2 3 4 5</p>
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S. Oshiro

Craig Nagamine	Darcia Forester	Jon Ikenaga	Eric Niemeyer
Vision- 4 Qualified -4	Vision- 4 Qualified- 4	Vision- 4 Qualified- 4	Vision- 2 Qualified- 1
Leadership of Applicant 4	5 [Supervisor]	5 [Supervisor]	2
Leadership of Staff 4	4	5	NA
Hilo /Kona 4	4	5	NA
Sex Harrass 4	4	4	NA
Bullying 4	4	4	NA
Legislative 4	4	5	NA
Training 5	4	3	NA
Human Resources 4	4	4	NA
41	41	43	Not Qualified
11+ vs. 15-	13+ vs. 16-	18+ vs. 4 -	

C. Glendon

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C. 01/12/2023

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<p>Hilo and Kona, and all other neighbor islands offices</p> <ul style="list-style-type: none"> a. Are you aware of what happened in Hilo and Kona? What are you aware of? What is your game plan for these two offices? b. How do you plan to increase applicants and hire for the neighbor islands c. What would you have done differently with the Hilo and Kona situations 	<p>1 2 3 4 5</p>
<p>Do you believe the office has an issue with Sexual Harassment and/or Other Inappropriate Behavior?</p> <ul style="list-style-type: none"> a. Does the office have a problem with sexual harassment? <p>You have an office where women don't feel respected, where sexual harassment has abounded unchecked, where complaints have been made but nothing done to change the culture</p> <ul style="list-style-type: none"> b. Does the office have a problem with bullying? <p>You have an office where people bully others and make things very uncomfortable for others – yet nothing is done to change it. How do you plan to address this? What would you do differently than other administrations.</p>	<p>1 2 3 4 5</p>

<p>Legislature</p> <p>a. Testifying at the legislature – is the office doing enough?</p> <p>b. Submission of proposals to increase budget</p> <p>c. Give us one or two topics you want to see the PDs introduce legislation on</p>	<p>1 2 3 4 5</p>
<p>Training – what is your position on training? What will you do to improve training?</p> <p>d. Seminar</p> <p>e. Mainland trainings</p> <p>f. Other trainings?</p>	<p>1 2 3 4 5</p>
<p>Human Resources</p> <p>g. Inappropriate behaviors.</p>	<p>1 2 3 4 5</p>

Issues of temperament

- h. As you know, we've accepted comments from the public. We received a mix of responses to your candidacy – those who support you, those who raise concerns.
- i. Jon –
 1. What do you think are the concerns that have been raised about you?
 2. Lets start with the good – many supporters believe that you are kind, approachable. Many have heard that you plan to bring [REDACTED] on as your First Deputy and they are happy with that. Some have expressed concern that you'll be more of the same of the previous administration; concern that you were complicit in the James/Lee leadership (or lack thereof) of the office; concern about your commitment to the office; concern about you courting then dating a subordinate in your section. How do you address each of these concerns and assure us that they will not be concerns.
 - ii. Darcia –
 1. What do you think are the concerns that have been raised about you?
 2. concern that your temperament is not fit for leadership. That you target certain attorneys and let your dislike of them be known and affect whether or not you include them in things such as seminar or opportunities in the office; concern that your temper gets the best of you and intimidates those around you; concern that you are approachable for people you like and unapproachable for people you don't like; concern that you particularly target women – that women do not feel comfortable that you will treat them fairly; concern that you don't treat pregnant women fairly. How do you address these concerns and assure us that they will not impact your ability to lead the office.
 - iii. Craig –
 1. What do you think are the concerns that have been raised about you?
 2. The concern is that you treat women differently, concern that
 - iv. Eric –
 1. What do you think are the concerns that have been raised about you? your lack of connection with the office, no confidence in your knowledge of Hawai'i criminal law

Questions for Candidates

Eric Niemeyer

Thank you for coming to this interview. We hold this position in the highest regard and have a great task ahead of us to make a decision that will impact the Office of the Public Defender for years to come.

The interview will go as follows:

We will ask core questions that will be the same for each candidate.

Next, we will ask questions that are designed specifically for each candidate based on the comments we received from the public.

At the end of the interview, you will have an opportunity to ask us questions

We may give you follow up homework to get back to us.

This interview will be scored by each Member of the Council based on the answers you give us. Each member of the Council has equal weight in this decision. The final decision will be issued on November 2, 2023 in the public meeting of the Council.

These questions and process have been approved by our Attorney General.

Give each candidate 5 minutes to summarize their vision for the office and explain why they are qualified	1 2 3 4 5

7

<p>Leadership: who will your administration be?</p> <ul style="list-style-type: none"> a. First Deputy b. Felony Supervisors c. Family Court d. District Court e. Appeals f. Administrative Assistants g. James Tabe and Lee Hayakawa – what are you going to do with them if they don't leave the office or retire? 	<p>1 2 3 4 5</p>
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<p>Legislature</p> <p>a. Testifying at the legislature – is the office doing enough?</p> <p>b. Submission of proposals to increase budget</p> <p>c. Give us one or two topics you want to see the PDs introduce legislation on</p>	<p>1 2 3 4 5</p>
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<p>Human Resources</p> <p>g. Inappropriate behaviors</p>	<p>1 2 3 4 5</p>

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1. What do you think are the concerns that have been raised about you?
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iii. Craig –

1. What do you think are the concerns that have been raised about you?
2. The concern is that you treat women differently, concern that

iv. Eric –

1. What do you think are the concerns that have been raised about you? your lack of connection with the office, no confidence in your knowledge of Hawai'i criminal law

Exhibit "33"

NOTICE TO REQUESTER

TO: Benjamin Creps
Civil Beat Law Center

FROM: Defender Council
c/o Deputy Attorney General Randall S. Nishiyama
randall.s.nishiyama@hawaii.gov

DATE THAT THE RECORD REQUEST WAS RECEIVED BY AGENCY: Nov. 2, 2023

DATE OF THIS NOTICE: Nov. 15, 2023

GOVERNMENT RECORDS YOU REQUESTED (attach copy of request or provide brief description below):
See attached request.

THIS NOTICE IS TO INFORM YOU THAT YOUR RECORD REQUEST:

Will be granted in its entirety as to the executive session minutes.

Cannot be granted as to audio or visual recordings of the executive sessions requested. Agency is unable to disclose the requested records for the following reason:

Agency does not maintain the records. (HRS § 92F-3)

Other agency that is believed to maintain records:

Agency needs further clarification or description of the records requested. Please contact the agency and provide the following information:

Request requires agency to create a summary or compilation from records, but requested information is not readily retrievable. (HRS § 92F-11(c))

Will be granted in part and denied in part as to the public written comments received about the applicants and the letters submitted by the applicants, **OR** Is denied in its entirety Although the agency maintains the requested records, it is not disclosing all or part of them based on the exemptions provided in HRS § 92F-13 and/or § 92F-22 or other laws cited below.

(Describe the portions of records that the agency will not disclose.)

RECORDS OR
INFORMATION WITHHELD

APPLICABLE
STATUTES

AGENCY
JUSTIFICATION

The letters submitted by the applicants have been segregated to protect their personal confidential information such as their home address, cell phone numbers, information revealing their age, information identifying others in their personal relationships, and also the names and identifying information about the individuals they may be asking to be their First Deputy. These items of information are withheld from public disclosure under HRS section 92F-13(1). The direct email addresses and direct telephone numbers of the current deputy public defenders who are applicants have also been segregated under HRS section 92F-13(3) because public disclosure of such direct contact information may have an adverse effect on their ability to perform their duties, given the nature of their work, thereby resulting in the frustration of a legitimate government function.

Information that would reveal the identities of employees of the Office of the Public Defender submitting comments/criticisms of the applicants for the Public Defender position and/or about other employees in the Office of the Public Defender is withheld from public disclosure pursuant to section 92F-13(3). Disclosure of such information would discourage individuals from submitting candid opinions and observations of the applicants, which adversely affects the Defender's Council's responsibility to select and appoint the Public Defender.

REQUESTER'S RESPONSIBILITIES:

You are required to (1) pay any lawful fees and costs assessed; (2) make any necessary arrangements with the agency to inspect, copy or receive copies as instructed below; and (3) provide the agency any additional information requested. **For questions about this notice or the records being sought, please ask the agency's contact person named at the top of this form.** Also, please submit your payment, if any, to the agency at the address listed at the top of this form. **DO NOT SEND YOUR PAYMENT** to the Office of Information Practices (OIP) unless you are requesting records directly from OIP.

If you do not comply with the requirements set forth in this notice within 20 business days after the postmark date of this notice or the date the agency makes the records available, you will be presumed to have abandoned your request and the agency shall have no further duty to process your request. Once the agency begins to process your request, you may be liable for any fees and costs incurred. If you wish to cancel or modify your request, you must advise the agency upon receipt of this notice.

Please note that the Office of Information Practices (OIP) does not maintain the records of other agencies, and a requester must seek records directly from the agency it believes maintains the records. If the agency denies or fails to respond to your written request for records or if you have other questions regarding compliance with the UIPA, then you may contact OIP at (808) 586-1400, oiip@hawaii.gov, or 250 South Hotel Street, Suite 107, Honolulu, Hawaii, 96813.

METHOD & TIMING OF DISCLOSURE:

Records available for public access in their entireties must be disclosed within a reasonable time, not to exceed 10 business days from the date the request was received, or after receipt of any prepayment required. Records not available in their entireties must be disclosed within 5 business days after this notice or after receipt of any prepayment required. HAR § 2-71-13(c). If incremental disclosure is authorized by HAR § 2-71-15, the first increment must be disclosed within 5 business days of this notice or after receipt of any prepayment required.

Method of Disclosure:

- Inspection at the following location:
- As requested, a copy of the record(s) will be provided in the following manner:
 - Available for pick-up at the following location:
 - Will be emailed to you.
 - Will be transmitted to you by other means requested:

Timing of Disclosure: All records, or the first increment if applicable, will be made available or provided to you:

- On November 15, 2023.
- After prepayment** of 50% of fees and 100% of costs, as estimated below.

For incremental disclosures, each subsequent increment will be disclosed within 20 business days after:

- The prior increment (if one prepayment of fees is required and received), or
- Receipt of each incremental prepayment, if prepayment for each increment is required.

Records will be disclosed in increments because the records are voluminous and the following extenuating circumstances exist:

- Agency must consult with another person to determine whether the record is exempt from disclosure under HRS chapter 92F.
- Request requires extensive agency efforts to search, review, or segregate the records or otherwise prepare the records for inspection or copying.

- Agency requires additional time to respond to the request in order to avoid an unreasonable interference with its other statutory duties and functions.
- A natural disaster or other situation beyond agency's control prevents agency from responding to the request within 10 business days.

ESTIMATED FEES & COSTS AND PAYMENT:

FEES: For personal record requests under Part III of chapter 92F, HRS, the agency may charge you for its costs only, and fee waivers do not apply.

For public record requests under Part II of chapter 92F, HRS, the agency is authorized to charge you fees to search for, review, and segregate your request (even if a record is subsequently found to not exist or will not be disclosed in its entirety). The agency must waive the first \$30 in fees assessed for general requesters, OR in the alternative, the first \$60 in fees when the agency finds that the request is made in the public interest. Only one waiver is provided for each request. See HAR §§ 2-71-19, -31 and -32.

COSTS: For either personal or public record requests, the agency may charge you for the costs of copying and delivering records in response to your request, and other lawful fees and costs.

PREPAYMENT: The agency may require prepayment of 50% of the total estimated fees and 100% of the total estimated costs prior to processing your request. If a prepayment is required, the agency may wait to start any search for or review of the records until the prepayment is received by the agency. Additionally, if you have outstanding fees or costs from previous requests, including abandoned requests, the agency may require prepayment of 100% of the unpaid balance from prior requests before it begins any search or review for the records you are now seeking.

The following is an itemization of what you must pay, based on the estimated fees and costs that the agency will charge you and the applicable waiver amount that will be deducted:

For public record requests only:

Fees: Search	Estimate of time to be spent: ___ hours (\$2.50 for each 15-minute period)	\$	
Review & segregation	Estimate of time to be spent: ___ hours (\$5.00 for each 15-minute period)	\$	
Fees waived	<input type="checkbox"/> general (\$30), OR <input type="checkbox"/> public interest (\$60) (Only one waiver per request)	<\$ ____>	
Other	Click or tap here to enter text. (Pursuant to HAR §§ 2-71-19 & 2-71-31)	\$	
Total Estimated Fees:		\$	waived

For public or personal record requests:

Costs: Copying	Estimate of # of pages to be copied: _____ (@ \$ ____ per page, pursuant to HRS § 92-21)	\$	
Delivery	Postage	\$	
Other	Click or tap here to enter text.	\$	
Total Estimated Costs:		\$	waived

TOTAL ESTIMATED FEES AND COSTS from above: \$ waived

The estimated fees and costs above are for the first incremental disclosure only. Additional fees and costs, and no further fee waivers, will apply to future incremental disclosures.

PREPAYMENT IS REQUIRED (50% of fees + 100% of costs, as estimated above) \$

UNPAID BALANCE FROM PRIOR REQUESTS (100% must be paid before work begins) \$

TOTAL AMOUNT DUE AT THIS TIME \$ **waived**

Payment may be made by: cash

personal check payable to: [Click or tap here to enter text.](#)

other

Submit your payment to the agency at the address listed at the beginning of this form, including the name of the agency's contact person.

Exhibit "34"

ANNE E. LOPEZ 7609
Attorney General for the State of Hawai'i

AMANDA J. WESTON 7496
DAVID N. MATSUMIYA 9640
Deputy Attorneys General
Department of the Attorney General
State of Hawai'i
425 Queen Street
Honolulu, Hawai'i 96813
Telephone: (808) 586-1300
Facsimile: (808) 586-8115
E-mail: amanda.j.weston@hawaii.gov
david.n.matsumiya@hawaii.gov

Attorneys for Defendants
DEFENDER COUNCIL, JON N. IKENAGA, AND
AGRIBUSINESS DEVELOPMENT CORPORATION
BOARD OF DIRECTORS

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT
STATE OF HAWAI'I

PUBLIC FIRST LAW CENTER,

Plaintiff,

vs.

DEFENDER COUNCIL; JON N. IKENAGA;
and AGRIBUSINESS DEVELOPMENT
CORPORATION BOARD OF DIRECTORS,

Defendants.

CIVIL NO.: 1CCV-24-0000050
(Other Civil Action)

DEFENDANT DEFENDER COUNCIL'S
WRITTEN RESPONSE TO *PLAINTIFF'S*
FIRST REQUESTS FOR PRODUCTION OF
DOCUMENTS TO DEFENDANT DEFENDER
COUNCIL DATED NOVEMBER 29, 2024

Judge: Honorable Jordon J. Kimura
Trial: June 23, 2025

**DEFENDANT DEFENDER COUNCIL'S WRITTEN RESPONSE TO
PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT DEFENDER COUNCIL DATED NOVEMBER 29, 2024**

Defendant DEFENDER COUNCIL ("**Defendant DC**"), by and through Anne E. Lopez,
Attorney General for the State of Hawai'i, and its attorneys Amanda J. Weston and
David N. Matsumiya, Deputy Attorneys General, pursuant to Rule 34(b) of the Hawai'i Rules of
Civil Procedure, hereby submits its written response to *Plaintiff's First Requests for Production
of Documents to Defendant Defender Council*, dated November 29, 2024 ("**Plaintiff's RPODs**")
as follows:

GENERAL RESPONSES AND OBJECTIONS

1. Defendant DC objects to each request for production of documents in the Plaintiff's RPODs to the extent that the requests seek the disclosure of privileged communication(s), information that is protected work product, and information concerning documents and tangible things prepared in anticipation of litigation or trial.

2. Defendant DC objects to each request for production of documents in the Plaintiff's RPODs to the extent that the requests seek the production of documents that are immaterial and irrelevant to the subject matter of this action.

3. Defendant DC objects to each request for production of documents in the Plaintiff's RPODs to the extent that the requests are unreasonably burdensome, oppressive, or vexatious in that the information so acquired would be of little or no relevance to the issues in this case, and/or would place an unreasonable and oppressive burden on Defendant DC in the expenditure of time, cost, and money.

4. Defendant DC objects to each request for production of documents in the Plaintiff's RPODs to the extent that the requests are so broad, uncertain, and unintelligible that Defendant DC cannot determine the nature of the documents sought, and to which Defendant DC, therefore, is unable to respond.

5. Defendant DC objects to each request for production of documents in the Plaintiff's RPODs to the extent that the requests seek information that is as easily available to Plaintiff PUBLIC FIRST LAW CENTER (the "**Plaintiff**") as it is to Defendant DC.

6. Defendant DC objects to each request for production of documents in the Plaintiff's RPODS to the extent that the requests seek information for which the required good cause or substantial need, as dictated by applicable statutes, court rules and case laws, has not been shown.

7. Defendant DC does not concede that any of its responses and/or documents will be admissible evidence at trial. Further, Defendant DC does not waive any objections, whether or not stated herein, to use such responses and/or documents at trial.

8. Defendant DC states that its discovery, investigation, and trial preparation are ongoing and have not been completed. Any and all responses to the Plaintiff's RPODS are based only on the documentation available to Defendant DC at the time that its responses and

objections were prepared. Defendant DC reserves its right to supplement its responses as necessary and appropriate.

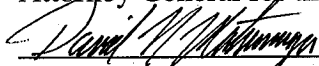
9. All specific responses and objections are made without waiving any of these general objections and statements.

10. Without waiving any of the foregoing objections, which Defendant DC incorporates by reference in its responses and/or objection to each of the following individual request for production of documents as if fully set forth therein, Defendant DC further responds and objects to the individual request for production of documents as follows.

DATED: Honolulu, Hawai'i, February 7, 2025.

ANNE E. LOPEZ

Attorney General for the State of Hawai'i



AMANDA J. WESTON

DAVID N. MATSUMIYA

Deputy Attorneys General

Attorneys for Defendants

DEFENDER COUNCIL, JON N. IKENAGA, AND

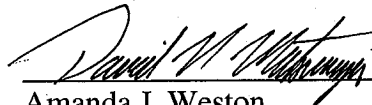
AGRIBUSINESS DEVELOPMENT CORPORATION

BOARD OF DIRECTORS

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. All communications concerning the Complaint or this action (Civil Number 1CCV-24-0000050).

Objection: Defendant DEFENDER COUNCIL (“**Defendant DC**”) objects to this request for production of documents on the grounds that the term “communications” as defined is vague, ambiguous, and overly broad as to its meaning and scope. Defendant DC further objects to this request for production of documents on the grounds that it does not specify the parties to the communications, which makes the request overly broad and unduly burdensome. Defendant DC objects to this request for production of documents to the extent that it seeks information that is personal and private to the applicants for the State Public Defender position. Finally, Defendant DC objects to this request for production of documents to the extent that it seeks the disclosure of privileged communication(s), information that is protected work product, and information concerning documents and tangible things prepared in anticipation of litigation or trial.



Amanda J. Weston
David N. Matsumiya
Deputy Attorneys General

Response: Without waiving the objections raised above and subject to them, Defendant DC responds as follows:

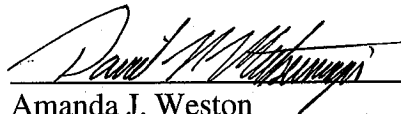
Without a stipulated protective order, Defendant DC will not produce any documents or information that are considered personal and private to the applicants for the Public Defender position. See DC 000001 – DC 000252.

Defendant DC’s discovery into this issue is ongoing. As a result, Defendant DC reserves the right to amend its response to this request for production of documents if its discovery into this matter indicates that its response is incorrect or incomplete.

2. All communications between August 2023 and February 2024 concerning the selection of State Public Defender or potential invalidation of that selection.

Objection: Defendant DC objects to this request for production of documents on the grounds that the term “communications” as defined is vague, ambiguous, and overly broad as to its meaning and scope. Defendant DC further objects to this request for production of documents on the grounds that it does not specify the parties to the communications, which makes the request overly broad and unduly burdensome. Defendant DC objects to this request for production of documents to the extent that it seeks information that is personal and private to the applicants for the State Public Defender position. Finally, Defendant DC objects to this request for production of documents to the extent that it seeks the disclosure of privileged communication(s),

information that is protected work product, and information concerning documents and tangible things prepared in anticipation of litigation or trial.



Amanda J. Weston
David N. Matsumiya
Deputy Attorneys General


Response: Without waiving the objections raised above and subject to them, Defendant DC responds as follows:

Without a stipulated protective order, Defendant DC will not produce any documents or information that are considered personal and private to the applicants for the Public Defender position. *See* DC 000001 – DC 000252.

Defendant DC's discovery into this issue is ongoing. As a result, Defendant DC reserves the right to amend its response to this request for production of documents if its discovery into this matter indicates that its response is incorrect or incomplete.

3. All communications between the Council and the candidates for State Public Defender in 2023 regarding their candidacy, applications, and interview scheduling.

Objection: Defendant DC objects to this request for production of documents on the grounds that the term "communications" as defined is vague, ambiguous, and overly broad as to its meaning and scope. Defendant DC further objects to this request for production of documents to the extent that it seeks information that is personal and private to the applicants for the State Public Defender position.



Amanda J. Weston
David N. Matsumiya
Deputy Attorneys General

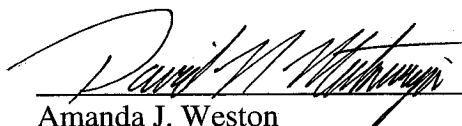
Response: Without waiving the objections raised above and subject to them, Defendant DC responds as follows:

Without a stipulated protective order, Defendant DC will not produce any documents or information that are considered personal and private to the applicants for the Public Defender position. *See* DC 000030 – DC 000215.

Defendant DC's discovery into this issue is ongoing. As a result, Defendant DC reserves the right to amend its response to this request for production of documents if its discovery into this matter indicates that its response is incorrect or incomplete.

4. All documents concerning the Council meetings held June 16, August 4, October 4, and November 2, 2023, including documents provided to Council members in connection with those the [sic] meetings.

Objection: Defendant DC objects to this request for production of documents on the grounds that the term “concerning” as defined is vague, ambiguous, and overly broad as to its meaning and scope. Defendant DC further objects to this request for production of documents on the grounds that the term “connection” is not defined and is vague, ambiguous, and overly broad as to its meaning and scope. Defendant DC objects to this request for production of documents to the extent that it seeks information that is personal and private to the applicants for the State Public Defender position. Finally, Defendant DC objects to this request for production of documents to the extent that it seeks the disclosure of privileged communication(s), information that is protected work product, and information concerning documents and tangible things prepared in anticipation of litigation or trial.



Amanda J. Weston
David N. Matsumiya
Deputy Attorneys General

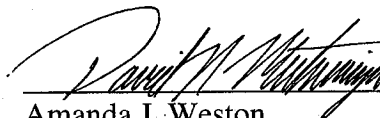
Response: Without waiving the objections raised above and subject to them, Defendant DC responds as follows:

Without a stipulated protective order, Defendant DC will not produce any documents or information that are personal and private to the applicants for the Public Defender position. *See* DC 000001 – DC 000252.

Defendant DC’s discovery into this issue is ongoing. As a result, Defendant DC reserves the right to amend its response to this request for production of documents if its discovery into this matter indicates that its response is incorrect or incomplete.

5. All documents, including notes or recordings, prepared by the Council during or concerning the Council meetings held June 16, August 4, October 4, and November 2, 2023, excluding official agendas and minutes.

Objection: Defendant DC objects to this request for production of documents on the grounds that the term “concerning” as defined is vague, ambiguous, and overly broad as to its meaning and scope. Defendant DC further objects to this request for production of documents to the extent that it seeks information that is personal and private to the applicants for the State Public Defender position.



Amanda J. Weston
David N. Matsumiya
Deputy Attorneys General


Response: Without waiving the objections raised above and subject to them, Defendant DC responds as follows:

At the present time, no notes or recordings have been located.

Defendant DC's discovery into this issue is ongoing. As a result, Defendant DC reserves the right to amend its response to this request for production of documents if its discovery into this matter indicates that its response is incorrect or incomplete.

6. All documents referenced in the Council's responses to Plaintiff's interrogatories.

Objection: Defendant DC objects to this request for production of documents on the grounds that the term "referenced" is not defined and is vague, ambiguous, and overly broad as to its meaning and scope. Defendant DC further objects to this request for production of documents to the extent that it seeks the disclosure of privileged communication(s), information that is protected work product, and information concerning documents and tangible things prepared in anticipation of litigation or trial.



Amanda J. Weston
David N. Matsumiya
Deputy Attorneys General

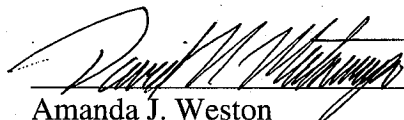
Response: Without waiving the objections raised above and subject to them, Defendant DC responds as follows:

Without a stipulated protective order, Defendant DC will not produce any documents or information that are personal and private to the applicants for the Public Defender position. See DC 000001 – DC 000252.

Defendant DC's discovery into this issue is ongoing. As a result, Defendant DC reserves the right to amend its response to this request for production of documents if its discovery into this matter indicates that its response is incorrect or incomplete.

7. Position descriptions for any person who verified answers to Plaintiff's interrogatories or responses to Plaintiff's requests for admissions.

Objection: Defendant DC objects to this request for production of documents on the grounds that the phrase "position descriptions" is not defined and is vague, ambiguous, and overly broad as to its meaning and scope.



Amanda J. Weston
David N. Matsumiya
Deputy Attorneys General

Response: Defendant DC responds as follows:

See Defendant DC's answer to Interrogatory No. 1. *See also* Hawaii Revised Statutes §§ 802-9, 802-11.

8. All documents the Council intends to use as evidence in this action (Civil Number 1CCV-24-0000050).

Response: Defendant DC responds as follows:

See DC 000001 – DC 000252. Defendant DC's discovery into this issue is ongoing. As a result, Defendant DC reserves the right to amend its response to this request for production of documents if its discovery into this matter indicates that its response is incorrect or incomplete.