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Attorneys for Movant
PUBLIC FIRST LAW CENTER

IN THE FAMILY COURT OF THE FIRST CIRCUIT
STATE OF HAWAII

SPECIAL PROCEEDING TO UNSEAL
ADOPTION RECORDS

1FFM-24-0000018

DECLARATION OF COUNSEL;
EXHIBITS "2" - "3"

DECLARATION OF COUNSEL

1. I, Benjamin M. Creps, am a staff attorney for Movant Public First Law Center (Public First) and submit this declaration based on personal knowledge, except as otherwise provided.
2. Attached as **Exhibit 2** is a true and correct copy of *MR v. TR*, No. CAAP-17-230, 2019 Haw. App. LEXIS 38, at *11 (Jan. 29, 2019) (unpublished) that I retrieved from LexisNexis.
3. As a precaution, the undersigned's colleague, Brian Black, screened Respondent Isaac Kalua's (Mr. Kalua) "Memorandum in Opposition to Motion to Unseal Adoption Records of Isabella P. Kalua, FKA Ariel Sellers" filed March 5, 2024 as Dkt. 21 (Kalua Opposition) and redacted arguably non-public information.
4. Attached as **Exhibit 3** is a true and correct copy of the redacted version of the Kalua Opposition. The undersigned has not seen and does not have access to the redacted information in the Kalua Opposition.

I declare under penalty of law that the foregoing is true and correct to the best of my knowledge.

DATED: Honolulu, Hawai'i, March 15, 2024

/s/ Benjamin M. Creps
BENJAMIN M. CREPS