

ROBERT BRIAN BLACK 7659
BENJAMIN M. CREPS 9959
700 Bishop Street, Suite 1701
Honolulu, Hawai'i 96813
brian@publicfirstlaw.org
ben@publicfirstlaw.org
Telephone: (808) 531-4000
Facsimile: (808) 380-3580

Attorneys for Public First Law Center

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

IN RE: PUBLIC FIRST LAW
CENTER,

Objector.

MISC. NO. 25-383
[CIV. NO. 21-00063 SASP-RT]

REPLY MEMORANDUM
REGARDING PUBLIC FIRST'S
OBJECTION TO STATE
DEFENDANTS' MOTION TO
SEAL SUMMARY JUDGMENT
EXHIBITS

**REPLY MEMORANDUM REGARDING PUBLIC FIRST'S
OBJECTION TO STATE DEFENDANTS' MOTION TO SEAL SUMMARY
JUDGMENT EXHIBITS**

Objector Public First Law Center (Public First) respectfully submits this reply regarding its Objection to State Defendants’ Motion to Seal Summary Judgment Exhibits filed October 24, 2025 [Dkt. 1] (Objection), pursuant to this Court’s minute order entered October 27, 2025.¹

The October 27 minute order required any responses to the Objection to be filed in the above-captioned miscellaneous matter by November 28, 2025. Dkt. 5.

On November 26, 2025, Plaintiff Archie John McCoy (Plaintiff) filed a statement providing that Plaintiff takes no position on the Objection so long as “the names, addresses, birth dates and confidential information concerning his minor children are deleted from any Court documents.” Dkt. 7 at PageID.46.

Public First has no objection to limited redaction of such information, as was done by Defendants Effective Planning and Innovative Communication, Inc. d.b.a. Epic ‘Ohana and Kathleen Shimabukuro. *E.g.*, Dkt. 1 at PageID.6, -19.

No other party has filed a response to the Objection.

Continued on following page

¹ “State Defendants” refers to Defendants Lena Kakehi, Lita Jyring, and Natasha Combs.

Accordingly, Public First respectfully requests that the Court unseal Exhibits “E”, “I”, “J”, “K”, “L”, “M”, and “P” to the State Defendants’ motion for summary judgment filed September 29, 2025 [Dkt. 193, 194]—after requiring the State Defendants to properly redact information pursuant to Fed. R. Civ. P. 5.2.

DATED: Honolulu, Hawai`i, December 4, 2025

/s/ Benjamin M. Creps
ROBERT BRIAN BLACK
BENJAMIN M. CREPS
Attorneys for Public First Law Center