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1ST CIRCUIT COURT
STATE OF HAWAII
FILED

2016 MAR 15 AM 10:39

N. MIYATA
CLERK

Attorneys for the STATE OF HAWAII

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

TAX FOUNDATION OF HAWAII, a
Hawaii nonprofit corporation, on behalf of
itself and those similarly situated,

Plaintiff

vs.

STATE OF HAWAII

Defendant.

Civil No. 15-1-2020-10 ECN
(Other Civil Action)

DEFENDANT STATE OF HAWAII'S
OPPOSITION TO PLAINTIFF'S CROSS-
MOTION FOR SUMMARY JUDGMENT
AGAINST DEFENDANT STATE OF
HAWAII'S MEMORANDUM IN
SUPPORT OF MOTION; CERTIFICATE
OF SERVICE

Trial Date: None

Hearing Motion:

Hearing Date: March 23, 2016

Time: 1:30 p.m.

Judge: Hon. Edwin C. Nacino

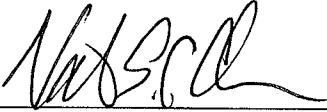
DEFENDANT STATE OF HAWAII'S OPPOSITION
TO PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT AGAINST
DEFENDANT STATE OF HAWAII'S MEMORANDUM IN SUPPORT OF MOTION

Defendant State of Hawaii ("State") opposes PLAINTIFF'S CROSS-MOTION FOR
SUMMARY JUDGMENT AGAINST DEFENDANT STATE OF HAWAII'S
MEMORANDUM IN SUPPORT OF MOTION filed on January 21, 2016 ("TP Motion"). The

State incorporates by reference herein DEFENDANT STATE OF HAWAII'S CROSS-MOTION FOR SUMMARY JUDGMENT filed on March 4, 2016; DEFENDANT STATE OF HAWAII'S MOTION TO DISMISS COMPLAINT FILED ON OCTOBER 21, 2015 filed on November 10, 2015; the memoranda in support and the declaration(s)/affidavit(s) and exhibits thereto; and any further evidence, filings, arguments as may be presented for or at the hearing of the TP Motion and/or the States' Motions.

DATED: Honolulu, Hawai'i, March 15, 2016.

DOUGLAS S. CHIN
Attorney General

By: 

HUGH R. JONES
NATHAN S.C. CHEE
Deputy Attorneys General

Attorneys for the STATE OF HAWAII'I

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

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CERTIFICATE OF SERVICE

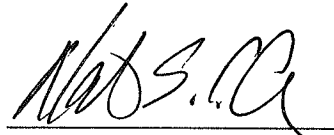
CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2016, a copy of the foregoing DEFENDANT STATE OF HAWAII'S OPPOSITION TO PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT AGAINST DEFENDANT STATE OF HAWAII'S MEMORANDUM IN SUPPORT OF MOTION, was duly served by hand delivery to:

PAUL ALSTON, ESQ.
TOM BUSH, ESQ.
Alston Hunt Floyd & Ing
1001 Bishop Street, Suite 1800
Honolulu, Hawai'i 96813

Attorneys for Plaintiff

DATED: Honolulu, Hawai'i, March 15, 2016.



NATHAN S.C. CHEE
Deputy Attorney General

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