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MAKAHA CONGREGATION OF JEHOVAH'S
WITNESSES, HAWAII and WATCHTOWER BIBLE
AND TRACT SOCIETY OF NEW YORK, INC.

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FIRST CIRCUIT
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IN THE CIRCUIT COURT OF THE FIRST CIRCUIT
STATE OF HAWAII

N.D.,

Plaintiff,

vs.

MAKAHA, HAWAII CONGREGATION
OF JEHOVAH'S WITNESSES, a Hawaii
non-profit unincorporated religious
organization, a.k.a. MAKAHA
CONGREGATION OF JEHOVAH'S
WITNESSES and KINGDOM HALL,
MAKAHA CONGREGATION OF
JEHOVAH'S WITNESSES;
WATCHTOWER BIBLE AND TRACT
SOCIETY OF NEW YORK, INC., a New
York corporation; KENNETH L. APANA,
Individually; and Does 1 through 100,
inclusive,

Defendants.

Civil No. 1CCV-20-0000390 DEO
(OTHER NON-VEHICLE TORT)

DEFENDANTS/CROSSCLAIMANTS
MAKAHA CONGREGATION OF
JEHOVAH'S WITNESSES, HAWAII
and WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.'S NOTICE OF SUBMISSION
FOR IN CAMERA REVIEW

Judge: Honorable Dean E. Ochiai
Trial: June 20, 2022

MAKAHA, HAWAII CONGREGATION OF JEHOVAH'S WITNESSES, a Hawaii non-profit unincorporated religious organization, a.k.a. MAKAHA CONGREGATION OF JEHOVAH'S WITNESSES and KINGDOM HALL, MAKAHA CONGREGATION OF JEHOVAH'S WITNESSES; and WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., a New York corporation,

Crossclaimants,

vs.

KENNETH L. APANA, Individually,

Crossclaim Defendant.

DEFENDANTS/CROSSCLAIMANTS MAKAHA CONGREGATION OF JEHOVAH'S WITNESSES, HAWAII and WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.'S NOTICE OF SUBMISSION FOR IN CAMERA REVIEW

Pursuant to the Court's request at the January 19, 2022 hearing on *Plaintiff's Motion to Compel Documents From Defendants Watchtower Bible and Tract Society of New York, Inc. and Makaha, Hawaii Congregation of Jehovah's Witnesses., a.k.a. Makaha Congregation of Jehovah's Witnesses and Kingdom Hall, Makaha Jehovah's Witnesses'*, filed November 23, 2021 [Doc. 251] (the "Motion"), Defendants/Crossclaimants Makaha Congregation of Jehovah's Witnesses, Hawaii ("Makaha") and Watchtower Bible and Tract Society of New York, Inc. ("WTNY"), hereby provide notice of their submission for the Court's *in camera* review of redacted and unredacted versions of documents requested in the Motion. The documents are redacted and unredacted versions of:

- MAKAHA 000001 REV – MAKAHA 000011 REV
- WTNY-C000004- WTNY-C000009
- WTNY-C000012

DATED: Honolulu, Hawai'i, January 21, 2022.

/s/ William S. Hunt

WILLIAM S. HUNT

JENNY J.N.A. NAKAMOTO

Attorneys for Defendants/Crossclaimants

MAKAHA CONGREGATION OF

JEHOVAH'S WITNESSES, HAWAII and

WATCHTOWER BIBLE AND TRACT

SOCIETY OF NEW YORK, INC.