

WILLIAM S. HUNT 1259  
CANDACE M. HOUGH 10658

DENTONS US LLP  
1001 Bishop Street, Suite 1800  
Honolulu, Hawai`i 96813-3689  
Telephone: (808) 524-1800  
Facsimile: (808) 524-4591  
Email: bill.hunt@dentons.com  
candace.hough@dentons.com

JOEL M. TAYLOR (Pro Hac Vice)  
1000 Watchtower Drive  
Patterson, New York 12563  
Telephone: (845) 306-0700  
Email: jmtaylor@jw.org

Attorneys for Defendants/Crossclaimants  
MAKAHA, HAWAII CONGREGATION OF  
JEHOVAH'S WITNESSES; and  
WATCHTOWER BIBLE AND TRACT  
SOCIETY OF NEW YORK, INC.

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  
(Other Non-Vehicle Tort)

**CERTIFICATE OF SERVICE**

*[Re Defendant/Crossclaimant Watchtower  
Bible and Tract Society of New York, Inc.'s  
Answers to Plaintiff's First Request For  
Answers to Interrogatories]*

**Electronically Filed  
FIRST CIRCUIT  
1CCV-20-0000390  
21-AUG-2020  
03:16 PM**

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.

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 20<sup>th</sup> day of August, 2020,  
*DEFENDANT/CROSSCLAIMANT WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW  
YORK, INC.’S RESPONSES TO PLAINTIFF’S FIRST REQUEST FOR ANSWERS TO  
INTERROGATORIES*, dated August 20, 2020, was served on the following parties listed  
below by U.S. mail, postage prepaid:

MARK S. DAVIS, ESQ.  
MATTHEW WINTER, ESQ.  
400 Davis Levin Livingston Place  
851 Fort Street  
Honolulu, HI 96813

Attorneys for Plaintiff

JAMES S. ROGERS, ESQ. *(Pro Hac Vice)*  
LAW OFFICES OF JAMES S. ROGERS  
1500 Fourth Avenue, Suite 500  
Seattle, WA 98101

Attorney for Plaintiff

KENNETH L. APANA  
73-4339 Papaana Place  
Kailua-Kona, HI 96740

Pro Se  
Defendant/Crossclaim Defendant

DATED: Honolulu, Hawai'i, August 21, 2020.

/s/ William S. Hunt

WILLIAM S. HUNT  
CANDACE M. HOUGH

Attorneys for  
Defendants/Crossclaimants  
MAKAHA, HAWAII  
CONGREGATION OF JEHOVAH'S  
WITNESSES and WATCHTOWER  
BIBLE AND TRACT SOCIETY OF  
NEW YORK, INC.