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IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

DANIEL HANAGAMI,

Plaintiff,

vs.

STATE OF HAWAII, DEPARTMENT OF
THE ATTORNEY GENERAL; HOLLY
SHIKADA; VALERIE KATO; and DOE
DEFENDANTS 1-50.

Defendants.

CIVIL NO. _____
(Other Civil Matter)

COMPLAINT; DEMAND FOR JURY
TRIAL; SUMMONS

COMPLAINT

Plaintiff DANIEL HANAGAMI, complains against Defendants STATE OF HAWAII,
DEPARTMENT OF THE ATTORNEY GENERAL, HOLLY SHIKADA, VALERIE KATO,
and DOE DEFENDANTS 1-50 as follows:

I. PARTIES

1. Plaintiff DANIEL HANAGAMI (“Plaintiff”), is, and at all times relevant herein
was, a resident of the City and County of Honolulu, State of Hawai‘i.

2. Upon information and belief, Defendant STATE OF HAWAII, DEPARTMENT OF THE ATTORNEY GENERAL (“Defendant AG”) is a governmental entity existing under the laws of the State of Hawaii and conducting business in the State of Hawai`i with its principal place of business in the City and County of Honolulu, State of Hawaii.

3. Upon information and belief, Defendant HOLLY SHIKADA (“Defendant Shikada”) is, and at all times material herein was, a resident of the City and County of Honolulu, State of Hawaii.

4. Upon information and belief, Defendant VALERIE KATO (“Defendant Kato”) is, and at all times material herein was, a resident of the City and County of Honolulu, State of Hawaii.

5. DOE DEFENDANTS 1-50 are individuals, corporations, partnerships, limited partnerships, joint ventures and/or other entities named hereunder fictitious names for the reason that their true identities are presently unknown to Plaintiff, except that they are persons and/or entities who are subsidiaries, agents, associates, masters, servants, employees and/or who were in some manner presently unknown to Plaintiff engaged in activities alleged in the Complaint filed herein; and/or who are in some manner responsible for the damages to Plaintiff; and/or who conducted some activity in a negligent and/or intentional manner, which negligent and/or intentional conduct was a proximate cause of the injuries or damages to Plaintiff; and/or who are in some manner related to the named Defendants; and Plaintiff prays leave to insert herein their true names and capacities, activities, and/or responsibilities when the same are ascertained. Plaintiff has conducted research through third-parties in order to identify the persons and/or entities liable for the damages to Plaintiff complained of herein. Plaintiff has conducted

independent research through a third party to ascertain the corporate identities of Defendants. The Plaintiff at this time is unable to identify the names and identities of the persons and/or entities until Plaintiff proceeds with discovery

6. At all times material herein, all employees or agents of Defendant AG were acting in the course and scope of their employment and/or agency and as employees and/or agents when engaging in the conduct alleged herein. Therefore, Defendant AG is directly liable for the conduct of its employees and/or agents, and Defendant AG is also liable under the doctrines of strict liability, respondeat superior, vicarious liability, and/or agency.

II. STATEMENT OF FACTS

7. Plaintiff was employed as Chief Special Investigator for Defendant AG from August 12, 2013 until Defendant AG illegally terminated Plaintiff's employment on September 9, 2022, effective close of business on September 19, 2022.

8. For the four-year period from 2017 through 2020, Defendant AG issued performance ratings of "exceptional" to Plaintiff.

9. Clare Connors ("AG Connors") was the Attorney General of the State of Hawaii from on or about January 3, 2019 until approximately December 10, 2021.

10. At all relevant times during AG Connors tenure, Holly Shikada ("AG Shikada") was AG Connors' First Deputy Attorney General and was later confirmed as the successor to AG Connors on April 19, 2022.

11. At the time Plaintiff was terminated by Defendant AG on September 9, 2022, effective close of business on September 19, 2022, Defendant Kato was Defendant AG's First Deputy Attorney General.

12. On March 4, 2021, for reasons previously unknown, AG Connors called Plaintiff into a meeting in AG Connors' office.

13. During the March 4, 2021 meeting, AG Connors discussed Plaintiff's prospective retirement.

14. Plaintiff informed AG Connors that Plaintiff had no intention of retiring.

15. Prior to March 4, 2021, Plaintiff had given no indication to Defendant AG that Plaintiff had plans to retire.

16. On April 23, 2021, approximately seven weeks after Plaintiff had refused to discuss his retirement with AG Connors during the March 4, 2021 meeting, AG Connors once again summoned Plaintiff to her office for another meeting.

17. During the April 23, 2021 meeting, AG Connors questioned Plaintiff's judgment.

18. During the April 23, 2021 meeting, AG Connors questioned Plaintiff's leadership ability.

19. During the April 23, 2021 meeting, AG Connors stated that she could no longer trust Plaintiff.

20. During the April 23, 2021 meeting, AG Connors then presented Plaintiff with charges of misconduct.

21. All of the charges of misconduct presented to Plaintiff by AG Connors on April 23, 2021 were false.

22. Some of the charges of misconduct presented by AG Connors to Plaintiff on April 23, 2021 were related to matters which occurred in 2019.

23. None of the charges of misconduct presented by AG Connors to Plaintiff on April 23, 2021 had been raised by Defendant AG to Plaintiff at any time prior to the March 4, 2021 meeting during which Plaintiff notified AG Connors that Plaintiff had no intention of resigning from his employment with Defendant AG.

24. After the April 23, 2021 meeting, AG Connors no longer communicated with Plaintiff regarding the operation of Plaintiff's office.

25. On May 7, 2021, Plaintiff made a complaint of age discrimination to Defendant AG's Personnel Administrator, Barbara Nitta ("Nitta").

26. Beginning on May 7, 2021 and continuing until September 17, 2021, AG Connors ordered AG Shikada and AG Connors' Special Assistant, Gary Yamashiroya ("Yamashiroya"), to engage in meetings under the guise of performance improvement.

27. The meetings between AG Shikada, Yamashiroya, and Plaintiff were harassing in nature to Plaintiff, as they were never intended nor designed to improve Plaintiff's performance but rather to force Plaintiff to resign.

28. On September 21, 2021, Plaintiff complained to Nitta that the weekly mandatory meetings with AG Shikada, Yamashiroya and, at times, Defendant AG's Administrative Services Manager, David Moore ("Moore"), placed Plaintiff in a hostile work environment where Plaintiff had to defend his actions as a supervisor.

29. On September 22, 2021, AG Shikada notified Plaintiff that the meetings would cease, only after Plaintiff submitted a doctor's note which indicated that the meetings were negatively affecting Plaintiff's health.

30. On July 2, 2021, Plaintiff filed a Charge of Discrimination with the Hawaii Civil Rights Commission which alleged harassment and discrimination based on Plaintiff's age.

31. Pursuant to the applicable Hawaii Civil Service Law, Defendant AG was required to present Plaintiff with an annual performance evaluation for the rating period from July 1, 2020 to June 30, 2021.

32. Defendant AG refused to present Plaintiff with an annual performance evaluation for the rating period from July 1, 2020 to June 30, 2021.

33. Pursuant to the applicable Hawaii Civil Service Law, Defendant AG was required to present Plaintiff with an annual performance evaluation for the rating period from July 1, 2020 to June 30, 2021.

34. Defendant AG refused to present Plaintiff with an annual performance evaluation for the rating period from July 1, 2021 to June 30, 2022.

35. Defendant AG's refusal to present Plaintiff with annual performance evaluations for the rating periods from July 1, 2020 to June 30, 2021 and from July 1, 2020 to June 30, 2021 violated the State of Hawaii's Civil Service Law, Hawaii Revised Statutes, Chapter 76.

36. On July 14, 2021, the State of Hawaii, Department of Public Safety Internal Affairs Office ("DPS") received an investigation referral from AG Connors and AG Shikada regarding alleged misconduct by Plaintiff.

37. The alleged misconduct which was the subject of the complaint by AG Connors and AG Shikada against Plaintiff arose from a single incident which occurred on March 4, 2020, almost eight months prior to submission of the complaint by AG Connors and AG Shikada.

38. On September 30, 2021, Plaintiff discovered a “concept legislative proposal” issued by AG Connors on September 23, 2021.

39. The “concept legislative proposal” was issued by AG Connors two days after Plaintiff had made another complaint to Nitta against AG Connors, AG Shikada, Yamashiroya, and Moore.

40. The “concept legislative proposal,” entitled “Employees of the Department of the Attorney General,” was intended to convert Plaintiff’s position, as well as the position of the Administrator of the Hawaii Criminal Justice Data Center (“HCJDC”), from civil service positions to “exempt” status.

41. Upon information and belief, the Administrator of the HCJDC was also terminated by Defendant AG in November of 2022.

42. On October 13, 2021, AG Shikada issued a memorandum which prohibited use of tasers and blue lights in Hawaii law enforcement vehicles, both of which had been approved for use by AG Connors’ and AG Shikada’s predecessor Attorneys General.

43. AG Shikada’s October 13, 2021 memorandum placed the safety of Plaintiff and members of his team in jeopardy, especially because Plaintiff and his team were frequently charged with issuing arrest warrants and confronting hostile persons who used public facilities.

44. From November 2021 to July 2022, Plaintiff was notified on numerous occasions by Plaintiff’s Deputy Chief Special Agent (“DCSA”) that Yamashiroya had been giving orders and assignments related to Plaintiff’s Investigations Division which Yamashiroya did not give to Plaintiff.

45. Yamashiroya's circumvention of Plaintiff's supervisory authority by issuing orders and assignments to the DCSA resulted in the disruption of Plaintiff's managerial authority and function.

46. In February 2022, AG Shikada participated in or advanced the proposed bill to remove civil service protection from Plaintiff's position and the position of the Administrator of HCJDC, as well as two other bills which proposed reorganization that would result in elimination or diminishment of Plaintiff's authority and function.

47. The legislation proposed or advanced by AG Shikada which was designed to remove Plaintiff's civil service protection and reduce or eliminate Plaintiff's authority and function did not pass.

48. On March 29, 2022, Plaintiff testified via Zoom video conferencing in opposition to the confirmation of AG Shikada as the State of Hawaii Attorney General.

49. During his March 29, 2022 testimony, Plaintiff raised his concerns and complaints of discrimination, including harassment and hostile work environment, and retaliation by Defendant AG.

50. On July 13, 2022, at 4:18 p.m., Plaintiff received an email sent by Defendant Kato and the Department of Public Safety's Chief Internal Affairs Investigator Patrick Nakashima, which email ordered Plaintiff to report for an administrative/disciplinary interview.

51. According to Defendant Kato's email, the administrative/disciplinary interview was to address Plaintiff's alleged violation of the Investigations Division's Standards of Conduct pertaining to Plaintiff's arrest of a perpetrator on March 4, 2020, more than two years and four months prior to Defendant Kato's July 13, 2022 email.

52. Plaintiff alleged that the administrative/disciplinary interview violated Plaintiff's Fourteenth Amendment Due Process rights based upon the amount of time which had passed since the alleged incident, as well as the lack of substance in support of the claims.

53. On July 13, 2022, Plaintiff and AG Shikada exchanged emails regarding another complaint made by AG Connors about overtime billing in connection with a investigation into another State Department.

54. On July 13, 2022, AG Shikada stated that the matter was still being investigated one year later, but AG Shikada had no documentation as to that supposed investigation.

55. On July 14, 2022, at 10:32 a.m., Plaintiff asked AG Shikada via email, if AG Shikada could state that to her knowledge, the overtime billing investigation was still ongoing and active.

56. On July 14, 2022, AG Shikada responded via email and informed Plaintiff that she had no information on the status of the alleged investigation.

57. On August 11, 2022, at 7:43 a.m., Plaintiff and his union agent met with Chief Investigator Patrick Nakashima ("Nakashima") and Investigator Charles Walton ("Walton") at the Department of Public Safety's Internal Affairs office.

58. On August 11, 2022, Plaintiff informed Nakashima and Walton that, based upon Plaintiff's Investigations Division's Standard of Conduct, Plaintiff would not be giving a statement because they were conducting an unlawful investigation based not only on the fraudulent accusations made against Plaintiff by AG Connors and AG Shikada, but also the amount of time that had passed since the alleged misconduct occurred.

59. Plaintiff notified Nakashima and Walton that the statute of limitations had expired based upon national law enforcement standards and the United States Department of Justice - Los Angeles Police Department 2001 consent decree.

60. On August 11, 2022, Nakashima and Walton informed Plaintiff of his Garrity Rights from their State of Hawaii Department of Public Safety Advice of Rights form PSD-0102 (5/95).

61. Nakashima and Walton fraudulently stated that Plaintiff was to respond to questions specifically, directly and narrowly relating to Plaintiff's duties and actions while performing, or fitness to perform, in the official capacity of the Department of Public Safety.

62. However, Plaintiff was not an employee of the Department of Public Safety, and, therefore, their orders had no merit and were illegally and inappropriately made.

63. On August 11, 2022, though Plaintiff was not an employee of the Department of Public Safety, Nakashima and Walton further informed Plaintiff of his Garrity Rights from their State of Hawaii Department of Public Safety Advice of Rights form SD-0102 (5/95) that, if Plaintiff refused to testify or to answer questions relating to Plaintiff's duties and actions while performing in the official capacity of their Department, that Plaintiff would be subjected to departmental charges which could result in Plaintiff's dismissal.

64. On August 11, 2022, Nakashima and Walton fraudulently utilized their State of Hawaii Department of Public Safety Advice of Rights, Direct Order form PSD-0164 (5/95) to order Plaintiff, under the authority of the Director of the Department of Public Safety and under the authority of Walton, to provide a statement.

65. Despite the fraudulent, illegal, and inappropriate bases of alleged authority, Walton ordered Plaintiff to abide by his issuance of a direct order to testify and respond to questions which are specifically, directly and narrowly relating to Plaintiff's duties and actions.

66. On August 25, 2022, at 8:15 a.m., Plaintiff was assigned to attend a transfer meeting with AG Shikada, Defendant Kato, and Yamashiroya.

67. The August 25, 2022 transfer meeting was for AG Shikada to announce who would be staying with the Defendant AG and who would be transferring to the Department of Law Enforcement.

68. During the August 25, 2022 transfer meeting, Plaintiff was informed that he would be transferred to the Department of Law Enforcement as of January 2024.

69. The August 25, 2022 transfer meeting lasted for about two minutes.

70. Plaintiff informed AG Shikada and Yamashiroya that they needed to review Governor Ige's November 28, 2017, Administrative Directive, Policy and Procedures for Effecting Organizational and Functional Statement of Changes.

71. Plaintiff notified AG Shikada and Yamashiroya that they were not in compliance with sustaining and development of the morale of the Investigations Division and that they were also transferring Plaintiff to a less desirable position.

72. On August 26, 2022, Plaintiff sent an internal complaint to Nitta in Defendant AG's Human Resources Division.

73. Plaintiff's August 26, 2022 complaint was for the adverse employment actions committed against him that violated Hawaii Revised Statutes ("HRS") §§ 707-764, 707-766,

created a hostile work environment, and violated Chapter X Human Resources Matter; B. ATG Code of Conduct; Violation of honesty and integrity; and other laws.

74. On August 29, 2022, Moore responded to Plaintiff's internal complaint via email with a letter attached that was dated August 26, 2022.

75. Moore's August 29, 2022 communication was regarding Plaintiff's criminal complaint of extortion committed by AG Shikada and Defendant Kato.

76. Moore informed Plaintiff that, based upon the ATG-Internal Complaint Procedure policy, the internal complaint process is the inappropriate method to file this complaint and that, for any criminal complaint, it is suggested that Plaintiff file this complaint through the appropriate law enforcement agencies within the State or Federal jurisdiction.

77. On September 2, 2022, AG Shikada finalized an order that nineteen employees of Plaintiff's office, including Plaintiff, were being transferred to the Department of Law Enforcement as of January 2024, and that twenty-eight members of Plaintiff's staff would remain with Defendant AG and would be supervised by attorneys and relocated.

78. AG Shikada's September 2, 2022 transfer order was not voluntary.

79. On September 8, 2022, the secretary of Defendant Kato, "Tracie," sent an email to Plaintiff which directed Plaintiff to report to the first- floor conference room at 425 Queen St. on September 9, 2022, at 8:00 a.m.

80. The September 8, 2022 email from "Tracie" notified Plaintiff that he would meet with Defendant Kato on September 9, 2022, but the email did not notify Plaintiff of the topic of the meeting.

81. On September 9, 2022, Plaintiff met with Defendant Kato, Supervisory Deputy Attorney General James Halvorson (“Halvorson”), and Nakashima of the Department of Public Safety.

82. Defendant Kato and Halvorson informed Plaintiff that they were serving Plaintiff with a notice of Plaintiff’s termination as Chief Special Investigator and employee of the Defendant AG, effective close of business on September 19, 2022.

83. Plaintiff was also notified during the September 9, 2022 meeting that Defendant AG was suspending Plaintiff as of the September 9, 2022 meeting until September 19, 2022, at which time Plaintiff’s employment would be terminated.

84. During the September 9, 2022 meeting, Defendant Kato notified Plaintiff that Plaintiff was barred from going back to Plaintiff’s office and banned from communicating with any of Plaintiff’s staff.

85. During the September 9, 2022 meeting, Defendant Kato notified Plaintiff that Plaintiff would be allowed to pick up all of his personal belongings at a later pre-arranged date and that Plaintiff was to turn in any Department-issued equipment in his possession to the Deputy Sheriffs who were also in attendance at that time.

86. Plaintiff was escorted to his assigned State of Hawaii vehicle and allowed to take out his personal equipment.

87. Nakashima and his Internal Affairs investigators drove Plaintiff to Plaintiff’s home and ordered to turn over Plaintiff’s Department-issued laptop.

88. Plaintiff timely filed a charge of discrimination with the Hawaii Civil Rights Commission, and he later received a Notice of Right to Sue. This Complaint is being filed within ninety days of receipt of said Notice of Right to Sue.

III. CLAIMS FOR RELIEF

First Claim for Relief: Illegal Employment Discrimination

89. Plaintiff realleges and incorporates by reference the allegations contained in paragraphs 1 through 88 hereinabove.

90. Based on the acts and omissions described above, Defendant AG is in violation of Chapters 368 and 378, *Hawaii Revised Statutes* (“HRS”), by discriminating against Plaintiff on the basis of his age, in that Plaintiff was harassed and subjected to a hostile working environment and disparate treatment, all of which violate HRS Chapter 378.

91. As a result of Defendant AG’s illegal discrimination against him, Plaintiff has suffered damages, and he is entitled to compensation in amounts to be proven at trial.

Second Claim for Relief: Aiding and Abetting

92. Plaintiff realleges and incorporates by reference the allegations contained in paragraphs 1 through 91 hereinabove.

93. By reason of the acts, omissions, and conduct hereinabove alleged, Defendants Kato and Shikada and as yet unidentified DOE Defendants have aided, abetted, incited, compelled, and/or coerced the doing of the aforesaid discriminatory practices and retaliation, in violation of *Hawaii Revised Statutes* § 378-2(3).

94. As a result of said conduct by Defendant Kato and Defendant Shikada and as yet unidentified DOE Defendants, Plaintiff has suffered damages, and he is entitled to compensation in amounts to be proven at trial.

Third Claim for Relief: Violation of Whistleblower Protection Act

95. Plaintiff realleges and incorporates by reference the allegations of paragraphs 1 through 94 hereinabove.

96. HRS Chapters 368 and 378, prohibit discrimination in employment based on, among other things, an employee's age.

97. HRS Chapter 76 provides protection to civil service employees of the State of Hawaii.

98. HRS Chapter 707 prohibits, among other things, the crime of extortion.

99. HRS Chapter 605-1 requires that Hawaii licensed attorneys be of good moral character.

100. The Constitution of the State of Hawaii guarantees due process to its citizens before deprivation of property and enjoyment of civil rights.

101. Defendant AG discharged, threatened, or otherwise discriminated against Plaintiff because Plaintiff reported or was about to report to Defendant AG and/or a public body violations or suspected violations of a law, rule, ordinance, or regulation adopted pursuant to laws of the State of Hawaii, a political subdivision of the State of Hawaii, and/or the United States, including, but not limited to, the aforementioned laws.

102. The aforesaid discharge, threats, or discrimination were in violation of HRS § 378-62.

103. As a direct and proximate result thereof, Plaintiff has suffered damages for injury or loss, including wage loss, general damages, and reasonable attorney's fees, and Plaintiff is entitled to the statutory remedies under the Whistleblower Protection Act.

104. In addition thereto, Defendants are subject to the imposition of fines pursuant to HRS § 378-65.

PUNITIVE DAMAGES

105. Plaintiff realleges and incorporates by reference the allegations of paragraphs 1 through 104 hereinabove.

106. Defendant Kato and Defendant Shikada, as well as DOE Defendants 1-50, have acted wantonly or oppressively, or with such malice, as implies a spirit of mischief or criminal indifference to civil obligations; or with that entire want of care which would raise the presumption of a conscious indifference to consequences.

107. As a direct and proximate result thereof, Plaintiff is entitled to punitive or exemplary damages in amounts to be shown at trial.

WHEREFORE, Plaintiff prays for Judgment against Defendant AG, Defendant Kato, Defendant Shikada, and yet unnamed DOE Defendants, jointly and severally, as follows:

1. For special damages in amounts to be proven at trial;
2. For general damages in amounts to be proven at trial;
3. For back pay, front pay, prejudgment interest, lost employment benefits, reasonable attorneys' fees and costs, and such other relief as the Court deems appropriate, pursuant to *Hawaii Revised Statutes* § 368-17(a), in amounts to be proven at trial;
4. For double, treble, and punitive damages in amounts to be proven at trial;

5. For an order of injunctive relief, as may be available to Plaintiff under Rule 65 of the *Hawaii Rules of Civil Procedure* and Chapters 368 and 378 of the *Hawaii Revised Statutes*, to enjoin the Defendants from continuing or maintaining any policy, practice, or custom whereby unlawful discrimination, harassment, and/or retaliation is the result.

6. All other relief which the Court deems appropriate, including, without limitation, all such relief and remedies provided for under Chapters 368 and 378 of the *Hawaii Revised Statutes*.

DATED: Honolulu, Hawaii, January 13, 2023.

/s/ Ryan K. Harimoto
RYAN K. HARIMOTO

Attorney for Plaintiff
DANIEL HANAGAMI

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

DANIEL HANAGAMI,

Plaintiff,

vs.

STATE OF HAWAII, DEPARTMENT OF
THE ATTORNEY GENERAL; HOLLY
SHIKADA; VALERIE KATO; and DOE
DEFENDANTS 1-50.

Defendants.

CIVIL NO. _____
(Other Civil Matter)

DEMAND FOR JURY TRIAL



DEMAND FOR JURY TRIAL

Comes now Plaintiff DANIEL HANAGAMI, by and through his attorney, and hereby
demands a trial by jury on all issues so triable.

DATED: Honolulu, Hawaii, January 13, 2023.

/s/ Ryan K. Harimoto
RYAN K. HARIMOTO

Attorney for Plaintiff
DANIEL HANAGAMI

STATE OF HAWAII CIRCUIT COURT OF THE FIRST CIRCUIT	SUMMONS TO ANSWER CIVIL COMPLAINT	CASE NUMBER
PLAINTIFF DANIEL HANAGAMI	VS.	DEFENDANT(S) STATE OF HAWAII, DEPARTMENT OF THE ATTORNEY GENERAL; HOLLY SHIKADA; VALERIE KATO; and DOE DEFENDANTS 1-50.
PLAINTIFF'S NAME & ADDRESS, TEL. NO. DANIEL HANAGAMI c/o Ryan K. Harimoto, Esq. 6720-0 1003 Bishop Street, Suite 2700 Honolulu, Hawaii 96813 Telephone: (808) 528-3113		
<p>TO THE ABOVE-NAMED DEFENDANT(S)</p> <p>You are hereby summoned and required to file with the court and serve upon</p> <p>Ryan K. Harimoto</p> <hr/> <p>plaintiff's attorney, whose address is stated above, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the date of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.</p> <p>THIS SUMMONS SHALL NOT BE PERSONALLY DELIVERED BETWEEN 10:00 P.M. AND 6:00 A.M. ON PREMISES NOT OPEN TO THE GENERAL PUBLIC, UNLESS A JUDGE OF THE ABOVE-ENTITLED COURT PERMITS, IN WRITING ON THIS SUMMONS, PERSONAL DELIVERY DURING THOSE HOURS.</p> <p>A FAILURE TO OBEY THIS SUMMONS MAY RESULT IN AN ENTRY OF DEFAULT AND DEFAULT JUDGMENT AGAINST THE DISOBEYING PERSON OR PARTY.</p>		
The original document is filed in the Judiciary's electronic case management system which is accessible via eCourt Kokua at: http://www.courts.state.hi.us	<p>Effective Date of 28-Oct-2019 Signed by: /s/ Patsy Nakamoto Clerk, 1st Circuit, State of Hawai'i</p> 	
 <p>In accordance with the Americans with Disabilities Act, and other applicable state and federal laws, if you require a reasonable accommodation for a disability, please contact the ADA Coordinator at the Circuit Court Administration Office on OAHU- Phone No. 808-539-4400, TTY 808-539-4853, FAX 539-4402, at least ten (10) working days prior to your hearing or appointment date.</p>		