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Attorneys for Plaintiffs KELI'I AKINA, KEALII MAKEKAU, JOSEPH KENT,  
YOSHIMASA SEAN MITSUI, PEDRO KANA'E GAPERO,  
and MELISSA LEINA'ALA MONIZ

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

KELI'I AKINA, KEALII MAKEKAU,  
JOSEPH KENT, YOSHIMASA SEAN  
MITSUI, PEDRO KANA'E GAPERO,  
and MELISSA LEINA'ALA MONIZ,

Plaintiffs,

vs.

CIVIL NO: 15-00322 BMK

MOTION FOR PRELIMINARY  
INJUNCTION; MEMORANDUM IN  
SUPPORT OF MOTION FOR  
PRELIMINARY INJUNCTION;

(Caption continued on next page)

THE STATE OF HAWAII;  
GOVERNOR DAVID Y. IGE, in his  
official capacity; ROBERT K. LINDSEY  
JR., Chairperson, Board of Trustees,  
Office of Hawaiian Affairs, in his official  
capacity; COLETTE Y. MACHADO,  
PETER APO, HAUNANI APOLIONA,  
ROWENA M.N. AKANA, JOHN D.  
WAIHE'E IV, CARMEN HULU  
LINDSEY, DAN AHUNA,  
LEINA'ALA AHU ISA, Trustees, Office  
of Hawaiian Affairs, in their official  
capacities; KAMANA'OPONO  
CRABBE, Chief Executive Officer,  
Office of Hawaiian Affairs, in his official  
Capacity; JOHN D. WAIHE'E III,  
Chairman, Native Hawaiian Roll  
Commission, in his official  
Capacity; NĀ'ĀLEHU ANTHONY, LEI  
KIHOI, ROBIN DANNER,  
MĀHEALANI WENDT,  
Commissioners, Native Hawaiian Roll  
Commission, in their official capacities;  
CLYDE W. NĀMU'O, Executive  
Director, Native Hawaiian Roll  
Commission, in his official capacity;  
THE AKAMAI FOUNDATION; and  
THE NA'I AUPUNI FOUNDATION;  
and DOE DEFENDANTS 1-50,

Defendants.

DECLARATION OF KEALII  
MAKEKAU; DECLARATION OF  
YOSHIMASA SEAN MITSUI;  
DECLARATION OF PEDRO KANA'E  
GAPERO; DECLARATION OF  
MELISSA LEINA'ALA MONIZ;  
DECLARATION OF JOSEPH  
WILLIAM KENT; EXHIBIT "1";  
DECLARATION OF DR. KELI'I  
AKINA; EXHIBITS "A" – "I";  
CERTIFICATE OF COMPLIANCE  
PURSUANT TO L.R. 7.5(b)

**MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs KELI’I AKINA, KEALII MAKEKAU, JOSEPH KENT, YOSHIMASA SEAN MITSUI, PEDRO KANA’E GAPERO, and MELISSA LEINA’ALA MONIZ (“Plaintiffs”), by their attorneys, respectfully move this Court for a Preliminary Injunction. Specifically, Plaintiffs seek the preliminary relief of an Order preventing Defendant’s from undertaking certain voter registration activities and from calling or holding racially-exclusive elections for Native Hawaiians, as explained in Plaintiffs’ Complaint. *See* Doc. No. 1, p. 32, Prayer for Relief.

This Motion is made pursuant to Local Rule 10.2(g) and Fed. R. Civ. Pro. 65, and is based upon the following memorandum in support, the declarations, and exhibits attached thereto.

DATED: Honolulu, Hawaii, August 28, 2015.

/s/ Michael A. Lilly

MICHAEL A. LILLY

ROBERT D. POPPER

LAUREN M. BURKE

CHRIS FEDELI

H. CHRISTOPHER COATES

Attorneys for Plaintiffs

KELI’I AKINA, KEALII MAKEKAU,  
JOSEPH KENT, YOSHIMASA SEAN  
MITSUI, PEDRO KANA’E GAPERO, and  
MELISSA LEINA’ALA MONIZ