

SCOTT GOOLD

Electronically Filed
FIRST CIRCUIT
1CCV-22-0001269
13-OCT-2022
11:51 AM
Dkt. 1 CMPS

Plaintiff

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

22 - 0001 269

SCOTT GOOLD,

Plaintiff,

vs.

FIRST HAWAIIAN BANK, INC.,
KATHY OYADOMARI, JOHN DOES 1-10;
JANE DOES 1-10; DOE CORPORATIONS
1-10; DOE PARTNERSHIPS 1-10; DOE
ENTITIES 1-10; AND DOE
GOVERNMENTAL ENTITIES 1-10,

Defendants.

CIVIL NO: 1CCV NO. 22-0001269
(Other Civil Action)

COMPLAINT; EXHIBIT A;
DEMAND FOR JURY TRIAL;
SUMMONS

2022 OCT 13 AM 11:51
N. ANAYA
CLERK
FIRST CIRCUIT COURT
STATE OF HAWAII
FILED

COMPLAINT

Plaintiff

SCOTT GOOLD ("Plaintiff") for causes of action against the above-

named Defendants, alleges and avers as follows:

I. JURISDICTION AND VENUE.

1. This Court has jurisdiction over this controversy pursuant to Hawai'i Revised Statutes ("HRS") § 603-21.5, as the amount in controversy, exclusive of interest, fees and costs, exceeds \$40,000.00, and HRS § 368-11, as this controversy includes a unlawful discrimination claim pursuant to Chapter 378, Part I. The Hawai'i Civil Right Commission ("HCRC") issued a right to sue letter effective July 15, 2022, attached as "**Exhibit A.**" This action is timely.

2. The First Circuit Court is the proper venue for this action pursuant to HRS § 603-36, as the claims for relief arose in the City and County of Honolulu, State of Hawai'i.

II. PARTIES.

3. Plaintiff SCOTT GOOLD ("Plaintiff") is and was at all relevant times a married resident of the State of Hawai'i.

4. Upon information and belief, Defendant FIRST HAWAIIAN BANK, INC. ("Defendant FHB") is and was at all relevant times a corporation with a principal place of business in the State of Hawai'i.

5. Upon information and belief, Defendant FHB is and was at all relevant times classified as a federal contractor and grantee under the Drug-Free Workplace Act, 41 U.S. Code § 8102.

6. Upon information and belief, Defendant KATHY OYADOMARI ("Defendant Oyadomari") is and was at all relevant times a resident of the State of Hawai'i and an employee of Defendant FHB.

7. Defendants JOHN DOES 1-10, JANE DOES 1-10, DOE CORPORATIONS 1-10, DOE PARTNERSHIPS 1-10, DOE ENTITIES 1-10, and DOE GOVERNMENTAL ENTITIES

1-10 (collectively referred to as “Doe Defendants”) are persons, corporations, partnerships, business entities, and/or governmental entities who acted in a negligent, wrongful or tortious manner which proximately caused or contributed to the injuries and damages sustained by Plaintiff. Plaintiff has been unable to ascertain the names and identities of the above-named Doe Defendants from the investigation conducted to date.

Accordingly, Plaintiff has sued the unidentified Doe Defendants herein with fictitious names pursuant to Rule 17(d) of the Hawaii Rules of Civil Procedure, and Plaintiff will substitute the true names, identities, capacities, acts and/or admissions of the Doe Defendants when the same are ascertained.

III. BACKGROUND FACTS.

A. Plaintiff’s History.

8. Plaintiff is a business intelligence specialist with over 30 years of experience in database management, data sciences and analytics, and research reporting focused on public health, environmental and financial sectors.

9. At all relevant times, Plaintiff had a debilitating medical condition and was disabled pursuant to HRS § 378-1, “Disability” means the state of having a physical or mental impairment which substantially limits one or more major life activities, having a record of such an impairment, or being regarded as having such an impairment.

10. At all relevant times, Plaintiff was registered with the State of Hawai’i — Department of Health as a qualifying patient and participant in the Medical Cannabis Registry Program (“MCRP”) under HRS § 329-121 et seq.

11. At all relevant times, Plaintiff held a valid registration certification for the MCRP and valid 329 Card.

B. Plaintiff Seeks Employment For Defendant FHB.

12. On November 9, 2021, and again on February 22, 2022, Plaintiff was not hired for positions for which Plaintiff was high qualified, for discriminatory reasons due to Plaintiff's disability or in retaliation for Plaintiff's opposing discrimination. These actions violate HRS, Chapter 378, Part I. Plaintiff's allegations of discrimination are based on the following:

13. Plaintiff submitted an application for employment with FHB as a Database Administrator II. Based on nearly 30 years of service experience excellence in database administration, Plaintiff was highly qualified for the position.

14. On July 31, 2021, Plaintiff was contacted by FHB Technical Recruiter Defendant Oyadomari, who acknowledged receipt of Plaintiff's application and asked Plaintiff to schedule an initial phone screen.

15. In response, Plaintiff disclosed that he had a minor disability involving a mobility issue and Plaintiff's doctor prescribed opioid pain relievers or medical cannabis sometimes in the evening to reduce pain so that Plaintiff can sleep. Plaintiff never medicates before or during work hours.

16. Plaintiff asked to know FHB's written policy on medical cannabis and opioid mediations.

17. In Plaintiff's prior employment, confusion over such policies led to loss of Plaintiff's job, which was humiliating to Plaintiff, and caused embarrassment to Plaintiff and Plaintiff's family.

18. On July 18, 2021, Plaintiff emailed Defendant Oyadomari advising the recruiter of his need to be clear regarding expectations related to Plaintiff's medical situation and disability.

19. On July 22, 2021, Defendant Oyadomari told Plaintiff that FHB's employment policies were confidential within the bank and generally not provided to candidates prior to hire.

20. Defendant Oyadomari noted that if Plaintiff should be the successful candidate to receive a conditional offer of employment, FHB would provide reasonable accommodations to employees with disabilities, as long as the accommodation did not impose an undue hardship on the company.

21. Defendant Oyadomari did not explain what would be considered undue hardship.

22. On July 27, 2021, Plaintiff emailed Defendant Oyadomari, and asked to pause his application. Plaintiff stated that because Defendants Oyadomari and FHB had not provided the medical information Plaintiff requested, Plaintiff contacted the HCRC and U.S. Equal Employment Opportunity Commission.

23. On October 27, 2021, Defendant Oyadomari gave Plaintiff an ultimatum to agree to an initial phone screen, which is the first step in Defendant FHB's hiring process, or be dropped from consideration for employment.

24. Plaintiff provided two dates and times to comply with the request: Tuesday, 11/2 at 2:00pm and Wednesday, 11/3 at 12:00pm.

25. However, FHB's hiring manager identified his choice for the Database Administrator II position by late October 2021. That candidate went through the final interview

with Defendant Oyadomari on October 29, 2021. Defendant Oyadomari agreed with the selection

26. On November 3, 2021, in violation of good faith, Defendants Oyadomari and FHB defrauded Plaintiff by interviewing Plaintiff without disclosing Defendant FHB had already selected the candidate for the position. The phone screen lasted less than 13 minutes.

27. Plaintiff was not asked to do a follow up interview, as would be expected for a candidate with Plaintiff's outstanding qualifications.

28. On November 9, 2021, Defendant Oyadomari informed Plaintiff that another candidate had been selected.

29. Defendant FHB claimed the selected applicant ("Selectee") scored over 20 points higher on a preliminary application assessment, although it is well-established that man-made algorithms are fallible and may inadvertently reinforce discrimination in hiring practices.¹

30. Defendant FHB claimed Selectee had more than 23 years experience in comparable positions, although extensive research proves that, statistically, years of experience is only the 14th best predictor of future job performance.²

31. On or around November 29, 2021, Plaintiff submitted an application for ETL Developer III position, for which Plaintiff was also highly qualified.

32. On December 14, 2021, Defendant Oyadomari emailed Plaintiff acknowledging that Defendant FHB had received Plaintiff's application, and that Plaintiff would be contacted if he met the appropriate qualifications.

¹ <https://hbr.org/2016/12/hiring-algorithms-are-not-neutral>

² <https://blog.staffingadvisors.com/2011/09/12/years-of-experience-or-accumulated-wisdom>

33. Plaintiff heard no further from Defendant FHB or Defendant Oyadomari about his application.

34. On numerous occasions up to February 22, 2022, Plaintiff emailed Defendant Oyadomari noting the ETL Developer III position was still being advertised.

35. Defendant FHB denied Plaintiff an interview for the ETL Developer III position claiming Plaintiff was not suitably qualified. Citing inadvertent oversight, Defendant FHB did not compute the automated scoring of the eligibility and banking experience/qualification questions on the application with any applicants for the ETL III position, including Plaintiff.

36. Plaintiff believes he was not hired for either of the two positions based on his disability, his non-Asian ethnicity or in retaliation for Plaintiff's action to report that he was contacting civil rights agencies.

IV. CLAIMS FOR RELIEF.

COUNT I (Discrimination)

37. Plaintiff realleges and incorporates by reference the allegations contained above as through fully set forth herein.

38. Plaintiff was justified to seek Defendant FHB's medical policy related to his disability upfront, as the prescribed medications might cause employment issues.

39. If required to modify the treatment plan, Plaintiff would need time to safely switch medications; if required to apply for a workplace waiver or conditional use authorization, Plaintiff would need time to meet with doctors and process the request.

40. Defendants FHB and Oyadomari discriminated against Plaintiff by refusing to cooperate with Plaintiff's simple request for information. Defendants FHB and Oyadomari must provide this information to all employees pursuant to the Drug-Free Workplace Act, 41 U.S. Code § 8102.

41. Defendants FHB and Oyadomari's refusal to provide Plaintiff with necessary medical policy forced Plaintiff to pause the application process and complain to civil rights organizations, which diminished Plaintiff's equal opportunity guarantees.

42. As a result of Defendants FHB and Oyadomari's discrimination, Plaintiff has been damaged in an amount to be proven at trial.

COUNT II
(Retaliation)

43. Plaintiff realleges and incorporates by reference the allegations contained above as through fully set forth herein.

44. Defendants FHB and Oyadomari retaliated against Plaintiff by conducting the initial phone screen after the hiring decision for the Database Administrator II position had been made.

45. Defendants FHB and Oyadomari retaliated against Plaintiff by refusing to interview Plaintiff and claiming Plaintiff was not qualified for the ETL III position.

46. As a result of Defendants FHB and Oyadomari's retaliatory behavior, Plaintiff has been damaged in an amount to be proven at trial.

COUNT III
(Fraud)

47. Plaintiff realleges and incorporates by reference the allegations contained above as through fully set forth herein.

48. Based on information and belief, Defendants FHB and Oyadomari made false representations to Plaintiff that use of medical cannabis or opioid medications would not be a problem for employment with the company.

49. Based on information and belief, Defendants FHB and Oyadomari made false representations to Plaintiff that he would be considered for employment if Plaintiff would undergo the initial phone screen interview.

50. Defendant Oyadomari knew of the falsity of her statements, or made her statement without knowledge of its truth or falsity.

51. Defendant Oyadomari made her statement in contemplation of inducing Plaintiff to undergo the initial phone screen interview.

52. Plaintiff relied upon the statements of Defendant Oyadomari, as a technical recruiter and human resources employee of Defendant FHB, and actually submitted to the initial phone screen interview.

53. As a result of Plaintiff's reliance on Defendant Oyadomari's statements, Plaintiff has been damaged in an amount to be proven at trial.

COUNT IV
(Defamation)

54. Plaintiff realleges and incorporates by reference the allegations contained above as through fully set forth herein.

55. Upon information and belief, Defendants FHB and Oyadomari made the following false and defamatory statements regarding Plaintiff: (1) Plaintiff was not as qualified as Selectee for the Database Administrator II position; (2) Plaintiff was not qualified for the ETL III position.

56. As a result of Defendants FHB and Oyadomari's unprofessional assessments, these statements harmed Plaintiff's reputation and lowered him in the estimation of the community, and caused personal humiliation, mental anguish, and suffering.

57. As a result of Defendants FHB and Oyadomari's actions Plaintiff has been damaged in an amount to be proven at trial.

COUNT V
(Intentional Infliction of Emotional Distress)

58. Plaintiff realleges and incorporates by reference the allegations contained above as through fully set forth herein.

59. Defendants had a duty to comply with the provisions of HRS § 378, Part I, in employment and termination decisions.

60. Defendants failed to comply with the provisions of HRS § 378, Part I, when they denied medical information to Plaintiff related to his disability.

61. Defendants' actions were intentional and reckless.

62. By denying medical information to Plaintiff despite Plaintiff's current registration and participation in the MCRP, Defendants' actions were outrageous.

63. As a direct and proximate result of Defendants' actions, Plaintiff suffered severe emotional distress resulting in physical injury and mental illness.

64. As a direct and proximate result of Defendants' actions, Plaintiff has been damaged in an amount to be proven at trial.

COUNT VI
(Negligent Infliction of Emotional Distress)

65. Plaintiff realleges and incorporates by reference the allegations contained above as through fully set forth herein.

66. Defendants had a duty to comply with the provisions of HRS § 378, Part I, in hiring and employment decisions.

67. Defendants failed to comply with the provisions of HRS § 378, Part I, when they denied medical information to Plaintiff.

68. As a direct and proximate result of Defendants' actions, Plaintiff suffered serious emotional distress resulting in physical injury and/or mental illness.

69. As a direct and proximate result of Defendants' actions, Plaintiff has been damaged in an amount to be proven at trial.

COUNT VII
(Respondeat Superior)

70. Plaintiff realleges and incorporates by reference the allegations contained above as through fully set forth herein.

71. At all times relevant herein, Defendant Oyadomari was an employee or agent of Defendant FHB, and was acting within the scope of her employment or agency when the tortious behavior described herein occurred.

72. Defendant FHB is vicariously liable for the actions of Defendant Oyadomari.

73. As a direct and proximate result of Defendants' actions, Plaintiff has been damaged in an amount to be proven at trial.

COUNT VIII
(Negligent Supervision)

74. Plaintiff realleges and incorporates by reference the allegations contained above as through fully set forth herein.

75. Defendant FHB has a duty to properly supervise its agents, employees and representatives.

76. Defendant FHB breached said duty by failing to supervise the activities of Defendant Oyadomari in connection with Plaintiff's request for medical information related to his disability, resulting in Plaintiff's discriminatory exclusion from employment opportunity.

77. As a proximate result of the negligence and gross negligence of Defendant FHB's failure to supervise, Plaintiff has been damaged in an amount to be proven at trial.

COUNT IX
(Negligent Training)

78. Plaintiff realleges and incorporates by reference the allegations contained above as through fully set forth herein.

79. Defendant FHB has a duty to properly train its agents, employees and representatives.

80. Defendant FHB breached said duty by failing to train Defendant Oyadomari in performing her respective duties, especially in connection with Plaintiff's request for medical information, resulting in Plaintiff's discriminatory exclusion from employment opportunity.

81. As a proximate result of the negligence and gross negligence of Defendant FHB's failure to train, Plaintiff has been damaged in an amount to be proven at trial.

COUNT X
(Declaratory Relief)

82. Plaintiff realleges and incorporates by reference the allegations contained above as through fully set forth herein.

83. During all relevant times, Plaintiff was a registered participant in the MCRP, using medical cannabis in compliance with the rules and requirements of that program.

84. The medical use of cannabis was legalized by the Hawaii State Legislature under HRS §§ 329-121 through 329-131. In relevant part, HRS § 329-125.5 states as follows:

For the purposes of medical care, including organ transplants, a registered qualifying patient's use of cannabis in compliance with this part shall be considered the equivalent of the use of any other medication under the direction of a physician and shall not constitute the use of an illicit substance or otherwise disqualify a registered qualifying patient from medical care.

85. Medical care under Title 19 of the Hawai'i Revised Statutes has been broadly defined as follows: "Medical care' means every type of care, treatment, surgery, hospitalization, attendance, service, and supplies as the nature of the injury or condition requires." HRS § 321-33.

86. Plaintiff seeks a declaration that his use of cannabis in compliance with HRS § 329-121 et seq., which resulted in discriminatory and retaliatory behavior by Defendant Oyadomari and Defendant FHB, did not constitute the use of an illicit substance.

V. PRAYER FOR RELIEF.


WHEREFORE, Plaintiff respectfully requests the following relief:

- A. That judgment be entered against Defendants, jointly and severally, for damages in an amount to be determined at trial, which include but are not limited to compensatory, special and general damages;
- B. That the Court award Plaintiff his reasonable attorneys' fees and costs;
- C. That the Court award Plaintiff pre-judgment and post-judgment interest; and
- D. For such further and other relief as this Court deems just and equitable.
- E. Attached hereto as **Exhibit A** is a true and correct copy of a Notice of Dismissal and Right to Sue letter from Mr. William D. Hoshijo dated June 22, 2022, and received by email from HCRC Investigator Supervisor Stephen K.L. Chang on July 15, 2022.

DATED: Honolulu, Hawai'i, October 13, 2022.

/s/ Scott Goold
SCOTT GOOLD

PLAINTIFF PRO SE

From: CHANG, STEPHEN K stephen.k.chang@hawaii.gov 
Subject: RE: [EXTERNAL] NO Certified Letters
Date: July 15, 2022 at 2:57 PM
To: Scott Goold

Dear Mr. Goold,

Attached is the document, notice of closure of your case, which we attempted to have delivered to you by certified mail.

Stephen K.L. Chang

Investigator Supervisor
Employment/Public Accommodations/State Access Unit
Hawai'i Civil Rights Commission
830 Punchbowl Street, Rm 411
Honolulu, HI 96813
(808) 586-8648 direct line

The information herein is intended for the personal and confidential use of the designated person(s) named above, is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521, and is legally privileged and confidential. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, the reader is hereby notified that you have received this e-mail in error, and that any review, dissemination, distribution or copying of this message is strictly prohibited. If you have received this communication in error, there has been no intention to waive any privilege and such privilege has not been waived. Please notify us immediately by telephone at 808-586-8636 or by replying to this message. Also, please destroy any printed copies and delete this message from any electronic media.

From: Scott Goold
Sent: Friday, July 15, 2022 10:35 AM
To: DLIR.HCRC.INFOR <dlir.hcrc.infor@hawaii.gov>; HOSHIJO, WILLIAM D <william.d.hoshijo@hawaii.gov>
Cc: CHANG, STEPHEN K <stephen.k.chang@hawaii.gov>; KUEHN, KENDELL E <kendell.e.kuehn@hawaii.gov>; Scott Goold
Subject: [EXTERNAL] NO Certified Letters

Aloha e HCRC ~

Not sure if you sent me something certified, but I've checked with all individuals and groups. You're the only one remaining. If you sent me a Certified Letter, Signature Required, I cannot get these. I received this notice yesterday, 7.15.22. Article was returned to sender on 7.11.22.

I do not authorize Certified Letters. Please do not contact me by Certified Mail — if you did.

Thank you!

EXHIBIT A



United States Postal Service®

Sorry We Missed You! We **Re** Deliver for You

Today's Date

7/11/22

Sender's Name

Item is at:

Post Office™ (See back)

Available for Pick-up After

Date:

Time:

For Redelivery

Go to usps.com/redelivery or see reverse

Letter

Large envelope, magazine, catalog, etc.

Parcel

Perishable Item

Other:

For Delivery: (Enter total number of items delivered by service type.)

For Notice Left: (Check applicable item)

Priority Mail
 Express™

Certified Mail™
(Must claim within 15 days or article will be returned)

Restricted Delivery

Registered Mail™

Insured Mail

Return Receipt for Merchandise

Adult Signature

Signature Confirmation™

If checked, you or your agent must be present at time of delivery to sign for item.

USPS Tracking # or Article Number(s)

7021 0350 0000 8116 9409

Notice Left Section

Customer Name and Address

Article Requiring Payment

Postage Due

COD

Customs

Amount Due

\$

Final Notice: Article will be returned to sender on

7/11/22

Delivered By and Date

PS Form 3849, July 2013

usps.com

Delivery Notice/Reminder/Receipt

Scott Goold
"I Believe We Can"



Goold Closure



HAWAII CIVIL RIGHTS COMMISSION

830 PUNCHBOWL STREET, ROOM 411 • HONOLULU, HI 96813-5095 • PHONE: (808) 586-8636 • FAX: (808) 586-8655 • TTY: (808) 586-8692

June 22, 2022

Certified Mail-RETURN RECEIPT REQUESTED

Scott Goold
1778 Ala Moana Boulevard, #2520
Honolulu HI 96815

**Re: Notice of Dismissal and Right to Sue in
S. Goold vs. First Hawaiian Bank
FEPA No. 21994; EEOC No. 37B-2022-00047**

Dear Scott Goold :

The investigator assigned to handle the discrimination complaint which you filed with the Hawaii Civil Rights Commission (HCRC) has recommended that the case be closed on the basis of no cause. The case has been reviewed by the Executive Director who concurs with this recommendation. This does not necessarily mean that the problems you alleged did not occur, but that the investigation could not confirm those allegations to the standard of proof level required by the statute for the Commission to further pursue the case.


Please be advised that this recommendation has been accepted, the processing of the case by this Commission has been closed effective June 22, 2022 and your complaint is being dismissed pursuant to Hawaii Administrative Rules (H.A.R.), Section 12-46-11. You now have the right to file a private lawsuit against Respondent in the State Circuit Court within ninety (90) days after receipt of this notice pursuant to Hawaii Revised Statutes Section 368-12 and H.A.R. Section 12-46-20, should you wish to do so. You are further advised that you should consult an attorney immediately if you wish to pursue this matter further. If you feel your case is strong, an attorney may well be willing to take your case forward because they are not limited, as this Commission is, by the requirement that the matter meet the required standard of proof level before proceeding.

Also be advised that a complainant may request reconsideration of this dismissal of the complaint only within thirty (30) days after the date of receipt of this Notice of Dismissal. (H.A.R. Section 12-46-11). The request for reconsideration must be in writing, must fully set forth the new evidence or specific reasons for disputing this dismissal and should be addressed to the Executive Director at the above address. However, please be advised that filing for reconsideration does not extend your 90-day deadline to file a private lawsuit.

Scott Goold
FEPA No. 21994
June 22, 2022
Page 2

This complaint was dual-filed with the U.S. Equal Employment Opportunity Commission. If you do not agree with this determination, you may request a substantial weight review from the U.S. EEOC. Such request must be made within 15 days of the date of this notification and be in writing. The request must be mailed to: U.S. EEOC, Los Angeles District Office, 255 East Temple Street, 4th Floor, Los Angeles CA 90012.

Sincerely,



William D. Hoshijo
Executive Director

WDH:ky

c: Sarah O. Wang, Esq.

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAI'I

SCOTT GOOLD,

Plaintiff,

vs.

FIRST HAWAIIAN BANK, INC.,
KATHY OYADOMARI, JOHN DOES 1-10;
JANE DOES 1-10; DOE CORPORATIONS
1-10; DOE PARTNERSHIPS 1-10; DOE
ENTITIES 1-10; AND DOE
GOVERNMENTAL ENTITIES 1-10,

Defendants.

CIVIL NO: 1CCV NO. 22-0001269
(Other Civil Action)

DEMAND FOR JURY TRIAL

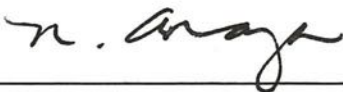

DEMAND FOR JURY TRIAL

Plaintiff SCOTT GOOLD hereby demands a trial by jury on all issues so
triable herein.

DATED: Honolulu, Hawai'i, October 13, 2022.

/s/ Scott Goold
SCOTT GOOLD

PLAINTIFF PRO SE

STATE OF HAWAII CIRCUIT COURT OF THE FIRST <input checked="" type="checkbox"/> CIRCUIT	SUMMONS TO ANSWER CIVIL COMPLAINT	
CASE NUMBER 1CCV NO. <u>22-0001269</u>		
PLAINTIFF'S NAME & ADDRESS, TEL. NO. SCOTT GOOLD		
PLAINTIFF SCOTT GOOLD	VS.	DEFENDANT(S) FIRST HAWAIIAN BANK, INC., KATHY OYADOMARI, JOHN DOES 1-10; JANE DOES 1-10; DOE CORPORATIONS 1-10; DOE PARTNERSHIPS 1-10; DOE ENTITIES 1-10; AND DOE GOVERNMENTAL ENTITIES 1-10
<p>TO THE ABOVE-NAMED DEFENDANT(S)</p> <p>You are hereby summoned and required to file with the court and serve upon SCOTT GOOLD</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>		
DATE ISSUED OCT 13 2022	CLERK 	CIRCUIT COURT CLERK
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		
	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; MAUI- Phone No. 808-244-2929, FAX 808-244-2777; HAWAII- Phone No. 808-961-7424, TTY 808-961-7422, FAX 808-961-7411; KAUAI- Phone No. 808-482-2365, TTY 808-482-2533, FAX 808-482-2509, at least ten (10) working days prior to your hearing or appointment date.	