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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JUL 07 2005
at _____ o'clock and _____ min.
SUE BEITIA, CLERK

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

RODELLE SMITH, SHEILA) CIVIL NO. CV04 00309
TOBIAS, BARBRA BARAWIS,) DAE KSC
and LEWIS GLASER) (Class Action)
individually, and on)
behalf of all persons)
similarly situated,) DEFENDANTS' REPLY
) MEMORANDUM IN SUPPORT OF
Plaintiffs,) COUNTER-MOTION FOR
) SUMMARY JUDGMENT;
vs.) AFFIDAVIT OF PATTI Y.
) MIYAMOTO; EXHIBITS "A",
STEPHANIE AVEIRO, in her) "B", "C", "D", "E";
official capacity as the) CERTIFICATE OF SERVICE
Executive Director of)
the Housing and)

Community Development)	
Corporation of Hawaii;)	
HOUSING AND COMMUNITY)	HEARING: July 12, 2005
DEVELOPMENT CORPORATION)	TIME: 2:15 P.M.
OF HAWAII, a duly)	JUDGE: HON. David Alan
organized and recognized)	Ezra
agency of the State of)	
Hawaii,)	Trial Date: Week of
)	November 14, 2005
Defendants.)	
)	
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**DEFENDANTS' REPLY MEMORANDUM IN SUPPORT
OF COUNTER-MOTION FOR SUMMARY JUDGMENT**

I. INTRODUCTION

Defendants file this Reply Memorandum pursuant to L.R.7.9. and respectfully reiterate their request that the Counter-Motion be granted and that an order be issued dismissing this entire action on the grounds of mootness. The relief sought by Plaintiffs has been effectuated by Defendants so

that there is nothing further for which this Court can enjoin Defendants from doing.

Adjustments to the tenant utility allowances in conformance with 24 C.F.R. §965.507 were implemented on October 1, 2004, retroactive to September 1, 2004.¹ Amendments to HCDCH's administrative rules incorporating the federal regulations have been promulgated and are awaiting the Governor's signature. *Affidavit of Patti Y. Miyamoto ("Miyamoto"), Exhibit "E"*. Additionally, changes in HCDCH's administrative procedures to annually review and notify residents of any required adjustments to the utility allowances have been ordered to prevent any future non-compliance with the federal regulations. *Affidavit of Stephanie Aveiro ("Aveiro"), Exhibit "C", to "Defendants' Counter-Motion For Summary Judgment", filed on June 21, 2005.*

¹ It should be noted that the Plaintiffs do not dispute anywhere in their Reply Memorandum, filed on June 30, 2005, that they have been accommodated with amended utility allowances and accordingly, they have already obtained the relief which they sought in this lawsuit. See, "*Plaintiffs' Reply Memorandum in Support of Plaintiffs' Motion for Partial Summary Judgment and in Opposition to Defendants' Counter-Motion for Summary Judgment*", filed on June 30, 2005 (hereafter referred to as "Plaintiffs Reply Memorandum").

Clearly, this action has been rendered moot and should be dismissed.

II. ARGUMENTS

A. This Lawsuit No Longer Presents a Live Case Or Controversy Under Article III of the U.S. Constitution

Initially, Defendants acknowledge that the case law imposes a heavy burden on the party seeking to dissolve a case based on mootness. Friends of the Earth, Inc. v. Laidlaw Environmental Services, Inc., 528 U.S. 167, 189 (2000); County of Los Angeles v. Davis, 440 U.S. 625 (1979). Although a heavy burden, it is not an impossible one to overcome, as Plaintiffs would lead this Court to believe. If that were the case, no case would ever be moot due to the subsequent remedial actions of a defending party.

Clearly, what the case law also establishes is that Article III of the U.S. Constitution requires that the jurisdiction of the federal courts extends only to live "cases or controversies" and where a

case has lost its character as such, the action becomes moot and must be dismissed. Lujan v. Defenders of Wildlife, 504 U.S. 555, 560-561 (1992); Santillian v. Ashcroft, --F.2d--, 2004 WL 2297990, at 2 (N.D.Cal., decided October 12, 2004).

An actual controversy must exist at all stages of the litigation, not just at the filing of the complaint. Arizonans for Official English v. Arizona, 520 U.S. 43, at 67, citing Preisser v. Newkirk, 422 U.S. 395, 401 (1975).

For injunctive relief, Article III standing requires an injury that is "actual or imminent, not conjectural or hypothetical" and the Plaintiff must demonstrate a "real or immediate threat of an irreparable injury" (emphasis added). Clark v. City of Lakewood, 259 F. 3d 996, 1007 (9th Cir., 2001), citing Cole v. Oroville Union High School, 228 F.3d 1092, at 1100 (9th Cir. 2000). Accordingly, where a controversy no longer exists as to the relief sought, the case is moot. Biodiversity Legal

Foundation v. Badgley, 284 F. 3d 1046, 1054 (9th Cir. 2002).

In trying to persuade the Court that this action is not moot, Plaintiffs have argued 1) "Defendants do not suggest that the new consumption allowances that HCDCH has proposed have been implemented" and 2) "the adoption of such rules are not yet complete". *Plaintiffs' Reply Memorandum*, at page 6. These arguments have no merit and totally ignore the fact that the very relief which formed the gravamen of this lawsuit, that is, providing federal public residents with appropriate utility allowances, has been effectuated as of October 1, 2004.

Further, as evidenced in the exhibits presented in Defendants Counter-Motion, Plaintiffs themselves were provided the proposed amended utility allowances and supporting documentation for their review and comment before the new allowances were implemented. For them to object at this point to

the bases on which the amended allowances were derived is, at best, disingenuous.

B. Defendants Are In Compliance With the Federal Regulations

Plaintiffs first argument that Defendants continue to be in non-compliance with the federal regulations, in spite of the corrective actions already taken, is totally without merit. Essentially, what Plaintiffs are arguing is that this case is not moot because the "annual review" of the "consumption allowance" and the translation into the actual utility dollars has not yet occurred. Then, they bootstrap this "fact" by asserting that the "annual review" cannot occur because the amended administrative rules, which would require such an annual review, have not been promulgated yet, i.e. signed off by the Governor.

First, the updated utility allowances implemented on October 1, 2004 were derived by HCDCH's consultant based on applicable utility-cost data and consumption data, which were provided

to Plaintiffs before the amended allowances were implemented. The reasonable consumption data was part of the basis upon which the amended allowances were computed in accordance to the guidelines of the federal regulations.

Second, it is illogical for Plaintiffs to argue that Defendants are in non-compliance because the "annual review" of the utility allowances has not taken place yet. Of course the annual review hasn't taken place because it is scheduled to occur in the next calendar year.

Finally, HCDCH's amended rule relating to the utility allowances, i.e. 17-2028-7 (which is only a portion of the entire bundle of rule amendments being promulgated), is presently awaiting the Governor's signature. However, Plaintiffs have to argue the fact that the rules have not been "finalized" because otherwise, they lose on the issue of mootness². Plaintiffs Reply Memorandum is

² Plaintiffs were successful in arguing this point in *Amone v. Aveiro*, supra, before Judge Kay at the May 31, 2005 hearing on the motions for partial summary judgment and the counter-motion for summary

strikingly silent as to what happens to the case when the Governor signs the amendment to the rules because they realize their entire argument against mootness falls when that occurs. Clearly, this Court is allowed to take judicial notice of the pending finalization of the rules by the Governor, which, incidentally, could occur by the hearing date of this Counter-Motion. However, if the Governor's signature would be a determinative factor for the Court on this Counter-Motion, then Defendants request that the Court take the matter under advisement and continue the hearing for two weeks to allow the finalization to occur.

C. The Relief Sought By The Plaintiffs Has Already Been Implemented So That There Is No Further Injunctive Relief That Can Be Ordered By The Court

The substantive corrective actions already taken by Defendants renders this action moot and obviates the need for any further relief which can be ordered by the Court. Clearly, the named

(cont'd.) judgment filed by Plaintiffs and Defendants respectively. However, at that time, the public hearings on the proposed rules as required by chapter 91, Haw. Rev. Stat., had not yet been completed.

Plaintiffs have been accommodated with updated utility allowances as evidenced by the documents attached to this Reply Memorandum. The named-Plaintiffs are the only parties in interest at this point, and therefore, the case must be analyzed only from their perspective.

In that regard, they no longer suffer an "actual" or "imminent" injury in fact, which can be redressed by any order from this Court. Covington v. Jefferson City, 358 F.3d 626, 637-638 (9th Cir. 2004). To justify that they are entitled to any further injunctive relief, it is Plaintiffs burden to establish that they have suffered or are suffering a concrete and particularized legal harm, or that there is sufficient likelihood that they will be harmed again in a similar way. Santillian v. Ashcroft, supra.

Plaintiffs cannot do this. The cumulative effect of the corrective actions already in place, including the amended utility allowances, the

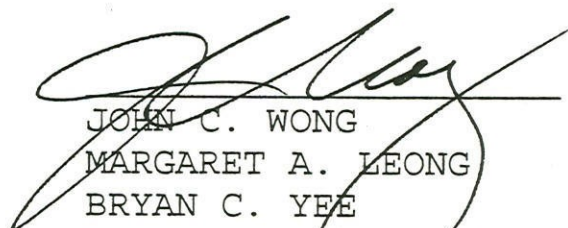
amended administrative rules and the administrative directives incorporating the federal regulations, should lead this Court to the logical conclusion that the circumstances which formed the basis for this lawsuit no longer exist and are not reasonably likely to recur.

III. CONCLUSION

Based on all the foregoing, there are no genuine issues of material fact and Defendants are entitled to summary judgment as a matter of law. This action is now moot and the Counter-Motion should be granted with an ancillary order dismissing this action.

DATED: HONOLULU, HAWAII July 7, 2005.

MARK J. BENNETT
Attorney General


JOHN C. WONG
MARGARET A. LEONG
BRYAN C. YEE
Deputy Attorneys General
ATTORNEYS FOR DEFENDANTS

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

RODELLE SMITH, et al.,)	CIVIL NO. CV04 00309	
)		DAE KSC
Plaintiffs,)	(Class Action)	
)		
vs.)		
)	AFFIDAVIT OF PATTI Y.	
STEPHANIE AVEIRO, et)	MIYAMOTO; EXHIBITS	
al.,)	"A", "B", "C", "D", "E"	
)		
Defendants.)		
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AFFIDAVIT OF PATTI Y. MIYAMOTO

STATE OF HAWAII`I)	
)	SS.
CITY AND COUNTY OF HONOLULU)	

PATTI Y. MIYAMOTO, being first duly sworn on oath, deposes and says:

1. I am the Chief Compliance Officer for the Housing and Community Development Corporation of Hawaii (HCDCH).

2. I am familiar with the records and files involved in this litigation and have direct knowledge of the facts and circumstances stated in this Affidavit.

3. Attached hereto as **Exhibit "A"**, is a true and correct copy of the letter dated September 28, 2004 from HCDCH's Property Management Branch Chief to Rodelle Smith informing her of her utility allowance adjustment effective October 1, 2004, and retroactive to September 1, 2004.

4. Attached hereto as **Exhibit "B"**, is a true and correct copy of the letter dated September 28, 2004 from HCDCH's Property Management Branch Chief to Sheila Tobias informing her of her utility allowance adjustment effective October 1, 2004, and retroactive to September 1, 2004.

5. Attached hereto as **Exhibit "C"**, is a true and Correct copy of the letter dated September 28, 2004 from HCDCH's Property Management Branch Chief to Barbara Barawis informing her of her utility

allowance adjustment effective October 1, 2004, and retroactive to September 1, 2004.

6. Attached hereto as **Exhibit "D"**, is a true and correct copy of the letter dated September 28, 2004 from HCDCH's Property Management Branch Chief to Lewis Glaser informing him of his utility allowance adjustment effective October 1, 2004 and retroactive to September 1, 2004 .

7. Attached hereto as **Exhibit "E"** is a true and correct copy of the memorandum dated June 29, 2005 transmitting the final version of HCDCH's amended administrative rules, including H.A.R. 12-2028-7 relating to the utility allowances, to Governor Linda Lingle for her final signature.

FURTHER AFFIANT SAYETH NAUGHT.


PATTI Y. MIYAMOTO

Subscribed and sworn to me on
This 6th day of July, 2005



Notary Public, State of Hawai'i

My commission expires: 07-12-2007

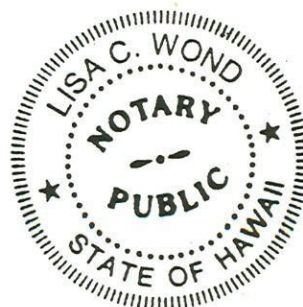


EXHIBIT "A"

LINDA LINGLE
GOVERNOR



STEPHANIE AVEIRO
EXECUTIVE DIRECTOR

STATE OF HAWAII
DEPARTMENT OF HUMAN SERVICES
HOUSING AND COMMUNITY DEVELOPMENT CORPORATION OF HAWAII
677 QUEEN STREET, SUITE 300
Honolulu, Hawaii 96813
FAX: (808) 587-0600

PAMELA Y. DODSON
EXECUTIVE ASSISTANT

MU File Copy: HI001061

September 28, 2004

Rodelle Smith
78-6725 Makolea St #1c
Kailua-Kona, HI 96740

Dear Rodelle:

As the new Property Management and Maintenance Branch Chief, one of my primary responsibilities is the oversight of the public housing projects for the Housing and Community Development Corporation of Hawaii (HCDCH). I'd like to take this opportunity to thank you for allowing my staff and me the opportunity to serve you.

Thank you for living with us in our public housing developments. I look forward to working with you and yours to have friendly communities with good and safe homes for all our families.

I am happy to announce that you will receive RENT CREDIT. In order to accomplish this, your utility allowance has changed from \$71 to \$142, retro-active to September 1, 2004. This utility allowance adjustment affects the amount of rent you pay each month. We have calculated that effective October 1, 2004 your rent will change from \$169 to \$98. You were also issued a rent credit for the month of September 2004.

We may make more changes in the future. We are looking for ways to improve our services and your homes. Thank you.

Sincerely,

David Hoicka
Property Management Branch Chief

APPEAL RIGHTS

If you do not agree with the above, you may request an informal hearing or discussion with the Project staff. A summary of the discussion will be prepared within fifteen (15) days and a copy given to you.

If you are not satisfied with the results, you are entitled to submit a written request or a hearing to the HCDCH project office within thirty (30) days after receipt of the summary of discussion.

A copy of the Grievance Procedure is available at the Project Office and any grievances will be processed as described in the procedure.

EXHIBIT "B"

LINDA LINGLE
GOVERNOR



STEPHANIE AVEIRO
EXECUTIVE DIRECTOR

STATE OF HAWAII
DEPARTMENT OF HUMAN SERVICES
HOUSING AND COMMUNITY DEVELOPMENT CORPORATION OF HAWAII
677 QUEEN STREET, SUITE 300
Honolulu, Hawaii 96813
FAX: (808) 587-0600

PAMELA Y. DODSON
EXECUTIVE ASSISTANT

September 28, 2004

MU File Copy: HI001061

Sheila Tobias
78-6725 Makolea St #4d
Kailua-Kona, HI 96740

Dear Sheila:

As the new Property Management and Maintenance Branch Chief, one of my primary responsibilities is the oversight of the public housing projects for the Housing and Community Development Corporation of Hawaii (HCDCH). I'd like to take this opportunity to thank you for allowing my staff and me the opportunity to serve you.

Thank you for living with us in our public housing developments. I look forward to working with you and yours to have friendly communities with good and safe homes for all our families.

I am happy to announce that you will receive RENT CREDIT. In order to accomplish this, your utility allowance has changed from \$59 to \$118, retro-active to September 1, 2004. This utility allowance adjustment affects the amount of rent you pay each month. We have calculated that effective October 1, 2004 your rent will change from \$142 to \$83. You were also issued a rent credit for the month of September 2004.

We may make more changes in the future. We are looking for ways to improve our services and your homes. Thank you.

Sincerely,

David Hoicka
Property Management Branch Chief

APPEAL RIGHTS

If you do not agree with the above, you may request an informal hearing or discussion with the Project staff. A summary of the discussion will be prepared within fifteen (15) days and a copy given to you.

If you are not satisfied with the results, you are entitled to submit a written request or a hearing to the HCDCH project office within thirty (30) days after receipt of the summary of discussion.

A copy of the Grievance Procedure is available at the Project Office and any grievances will be processed as described in the procedure.

EXHIBIT "C"



LINDA LINGLE
GOVERNOR

STEPHANIE AVEIRO
EXECUTIVE DIRECTOR

STATE OF HAWAII
DEPARTMENT OF HUMAN SERVICES
HOUSING AND COMMUNITY DEVELOPMENT CORPORATION OF HAWAII
677 QUEEN STREET, SUITE 300
Honolulu, Hawaii 96813
FAX: (808) 587-0600

PAMELA Y. DODSON
EXECUTIVE ASSISTANT

MU File Copy: HI001061

September 28, 2004

Barbara Barawis
78-6725 Makolea St #3b
Kailua-Kona, HI 96740

Dear Barbara:

As the new Property Management and Maintenance Branch Chief, one of my primary responsibilities is the oversight of the public housing projects for the Housing and Community Development Corporation of Hawaii (HCDCH). I'd like to take this opportunity to thank you for allowing my staff and me the opportunity to serve you.

Thank you for living with us in our public housing developments. I look forward to working with you and yours to have friendly communities with good and safe homes for all our families.

I am happy to announce that you will receive RENT CREDIT. In order to accomplish this, your utility allowance has changed from \$71 to \$142, retro-active to September 1, 2004. This utility allowance adjustment affects the amount of rent you pay each month. We have calculated that effective October 1, 2004 your rent will change from \$697 to \$261. You were also issued a rent credit for the month of September 2004.

We may make more changes in the future. We are looking for ways to improve our services and your homes. Thank you.

Sincerely,

David Hoicka
Property Management Branch Chief

APPEAL RIGHTS

If you do not agree with the above, you may request an informal hearing or discussion with the Project staff. A summary of the discussion will be prepared within fifteen (15) days and a copy given to you.

If you are not satisfied with the results, you are entitled to submit a written request or a hearing to the HCDCH project office within thirty (30) days after receipt of the summary of discussion.

A copy of the Grievance Procedure is available at the Project Office and any grievances will be processed as described in the procedure.

EXHIBIT "D"

LINDA LINGLE
GOVERNOR



STEPHANIE AVEIRO
EXECUTIVE DIRECTOR

STATE OF HAWAII
DEPARTMENT OF HUMAN SERVICES
HOUSING AND COMMUNITY DEVELOPMENT CORPORATION OF HAWAII
677 QUEEN STREET, SUITE 300
Honolulu, Hawaii 96813
FAX: (808) 587-0600

PAMELA Y. DODSON
EXECUTIVE ASSISTANT

MU File Copy: HI001061

September 28, 2004

Lewis Glaser
78-6725 Makolea St #1f
Kailua-Kona, HI 96740

Dear Lewis:

As the new Property Management and Maintenance Branch Chief, one of my primary responsibilities is the oversight of the public housing projects for the Housing and Community Development Corporation of Hawaii (HCDCH). I'd like to take this opportunity to thank you for allowing my staff and me the opportunity to serve you.

Thank you for living with us in our public housing developments. I look forward to working with you and yours to have friendly communities with good and safe homes for all our families.

I am happy to announce that you will receive RENT CREDIT. In order to accomplish this, your utility allowance has changed from \$41 to \$79, retro-active to September 1, 2004. This utility allowance adjustment affects the amount of rent you pay each month. We have calculated that effective October 1, 2004 your rent will change from \$196 to \$158. You were also issued a rent credit for the month of September 2004.

We may make more changes in the future. We are looking for ways to improve our services and your homes. Thank you.

Sincerely,

David Hoicka
Property Management Branch Chief

APPEAL RIGHTS

If you do not agree with the above, you may request an informal hearing or discussion with the Project staff. A summary of the discussion will be prepared within fifteen (15) days and a copy given to you.

If you are not satisfied with the results, you are entitled to submit a written request or a hearing to the HCDCH project office within thirty (30) days after receipt of the summary of discussion.

A copy of the Grievance Procedure is available at the Project Office and any grievances will be processed as described in the procedure.

EXHIBIT "E"

LINDA LINGLE
GOVERNOR



STEPHANIE AVEIRO
EXECUTIVE DIRECTOR

PAMELA Y. DOOSON
EXECUTIVE ASSISTANT

STATE OF HAWAII
DEPARTMENT OF HUMAN SERVICES
HOUSING AND COMMUNITY DEVELOPMENT CORPORATION OF HAWAII
577 QUEEN STREET, SUITE 300
HONOLULU, HAWAII 96813
FAX: (808) 587-0600

IN REPLY REFER TO:

05:PEO/105

June 29, 2005

To: The Honorable Linda Lingle
Governor of Hawaii

Through:  Lillian Koller, Director
Department of Human Services

From:  Stephanie Aveiro
Executive Director

Subject: Final Approval of the Adoption of Chapter 17-2028, Hawaii Administrative Rules
and the Repeal of Chapter 15-190, Hawaii Administrative Rules

We are requesting your final approval of the adoption of Chapter 17-2028, "Federally-Assisted Housing Projects", Hawaii Administrative Rules and the Repeal of Chapter 15-190, "Federally-Assisted Housing Projects", Hawaii Administrative Rules. Enclosed are three copies each of the proposed rules chapters.

On March 17, 2005, the Housing and Community Development Corporation of Hawaii (HCDCH) Board authorized the Executive Director or her designee to conduct public hearings on the proposed Chapter 17-2028, Hawaii Administrative Rules and the Repeal of Chapter 15-190, Hawaii Administrative Rules. The Governor approved conducting the public hearings on August 2, 2004. Public hearings were held at 6:00 p.m. on May 23, 2005 and 10:30 a.m. on June 28, 2005. The following information is provided pursuant to Administrative Directive No. 99-02:

- a. The facts and circumstances regarding the proposed adoption of Chapter 17-2028, Hawaii Administrative Rules and the Repeal of Chapter 15-190, Hawaii Administrative Rules, have not changed compared to the information that was sent to the Governor before the public hearing.
- b. The proposed rules were approved as to form by the Attorney General.
- c. No amendments were made following the public hearings.

d. The proposed rules do not affect small business.

At the March 17, 2005 meeting, the HCDCH Board of Directors approved the final adoption of Chapter 17-2028, Hawaii Administrative Rules and the Repeal of Chapter 15-190, Hawaii Administrative Rules, provided that no substantive changes were made to the rules. No substantive changes were made to these rules following the public hearing.

Should you have any questions, please call Mavis Masaki, Chief Planner at 587-0636.

Enclosures: 3 original copies of Chapter 17-2028

DEPARTMENT OF HUMAN SERVICES

The repeal of Chapter 15-190, Hawaii Administrative Rules, and the adoption of Chapter 17-2028, Hawaii Administrative Rules, on the Summary page dated June 29, 2005, was adopted on June 29, 2005 following public hearings held on May 23, 2005 and June 27, 2005 after public notice was given in the Honolulu Star-Bulletin, the Garden Island, The Maui News, West Hawaii Today, and the Hawaii Tribune Herald on April 22, 2005 and the Honolulu Star-Bulletin and the Garden Island on May 29, 2005.

The repeal and adoption shall take effect ten days after filing with the Office of the Lieutenant Governor.



CHARLES A. STED, Chairperson
Housing and Community
Development Corporation of
Hawaii



THEODORE E. LIU
Director of Business,
Economic Development and
Tourism

APPROVED AS TO FORM:


Deputy Attorney General

LINDA LINGLE
Governor
State of Hawaii
Date: _____

Filed

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

RODELLE SMITH, et al.,) CIVIL NO. CV04 00309
) DAE KSC
 Plaintiffs,)
) (Class Action)
 vs.)
) **CERTIFICATE OF SERVICE**
STEPHANIE AVEIRO, et)
al.,)
)
 Defendants.)
)
)
)
) (No trial date set)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was duly served upon the following by depositing the same in the United States mail, postage prepaid, as addressed below:

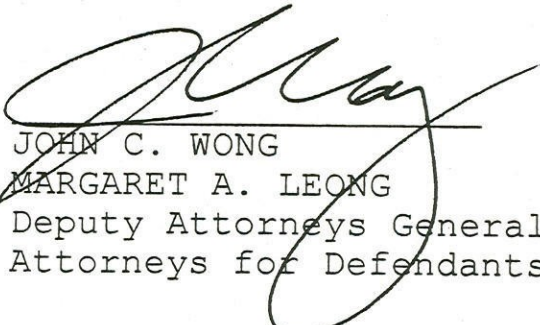
GAVIN K. THORNTON
SUSAN K. DORESY
P.O. BOX 37952
HONOLULU HI 96837-0952

Attorney for Plaintiffs

SHELBY ANNE FLOYD
PAUL ALSTON
65-1230 MAMALAHOA HWY SUITE C21
KAMUELA HI 96743

Attorneys for Plaintiffs

DATED: Honolulu, Hawaii, July 7, 2005.



JOHN C. WONG
MARGARET A. LEONG
Deputy Attorneys General
Attorneys for Defendants