1	JERRY H. STEIN (State Bar No. 78309)	
2	LEVIN & STEIN 28494 Westinghouse Place, Suite 201	
3	Valencia, California 91355 Telephone: (310) 207-4663	
4	Facsimile: (310) 207-2803 Email: jstein@lscslaw.com	
5	KEN T. KUNIYUKI	
6	KUNIYUKI & CHANG Suite 2660, Pauahi Tower	
7	1003 Bishop Street Honolulu, HI 96813-3429	
8	Telephone: (808) 524-5111 Facsimile: (808) 521-2389	
9	Email: ken@law-hawaii.com	
10	Attorneys for Defendants and Counter-Claimants JC	OHN DOE and JANE DOE
10	UNITED STATES DISTRICT COURT	
	EASTERN DISTRICT OF CALIFORNIA	
12	ERIC GRANT,	) CASE NO.:08-00672 FCD-KSM
13	Plaintiff,	) ) DECLARATION OF JERRY H. STEIN IN
14	v. KAMEHAMEHA SCHOOLS/BERNICE	SUPPORT OF REPLY TO OPPOSITION TO MOTION FOR TEMPORARY RESTRAINING
15	PAUAHI BISHOP ESTATE; J. DOUGLAS ING, NAINOA THOMPSON, DIANE J. PLOTTS,	ORDER AND PRELIMINARY INJUNCTION
16	ROBERT K.U. KIHUNE, and CORBETT A.K KALAMA, in their capacities as Trustees of the	
17	Kamehameha Schools/ Bernice Pauahi Bishop Estate; JOHN DOE; and JANE DOE,	
18	Defendants.	
19	JOHN DOE; and JANE DOE,	
20	Counter-Claimants	
21		
22	v. KAMEHAMEHA SCHOOLS/BERNICE	
23	PAUAHI BISHOP ESTATE; J. DOUGLAS ING,	
24	NAINOA THOMPSON, DIANE J. PLOTTS, ROBERT K.U. KIHUNE, and CORBETT A.K	) )
25	KALAMA, in their capacities as Trustees of the Kamehameha Schools/ Bernice Pauahi Bishop	) )
26	Estate; and ERIC GRANT,	) )
27	Counter-Defendants	) )
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	DECLARATION OF JERRY H.	STEIN IN SUPPORT OF REPLY

I, Jerry H. Stein, declare as follows:

- 1. I am an attorney at law duly licensed to practice before all courts of the State of California and before this Court. I am a partner in the law firm of Levin & Stein, which firm represents the Does in this action. I have personal knowledge of all facts set forth in this Declaration and if called upon to testify, I could and would testify competently thereto.
- 2. On April 14, 2008, I did a search on the Lexis data base to determine if there were any transactions in which the Estate of Bernice Pauahi Bishop (the "Estate") appeared as a seller or buyer of real property in California. Four such transactions were identified, including a June 2003 transaction in which the Estate sold property in Riverside County. A true and correct printout of the information available on Lexis regarding this June of 2003 transaction is attached hereto as Exhibit 1.
- 3. Attached hereto as Exhibit 2 is a true and correct copy (without attachments) of an E-mail I received from Paul Alston, one of the Estate's attorneys. The E-mail provides in relevant part:

"Attached is a letter the Cades firm received from Banks & Watson. As you will see, that letter claims (wrongly) that KS "believes it has no claim" against Mr. Grant. KS presently has no such belief; it is, as I said above, still evaluating its rights."

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 15, 2008.

/s/ Jerry H. Stein<sup>1</sup>
Jerry H. Stein

<sup>&</sup>lt;sup>1</sup> Counsel has the executed original.