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15 THOMPSON, DIANE J. PLOTTS, ROBERT K.U. KIHUNE,
and CORBETT A.K. KALAMA, in their capacities
16 as Trustees of the Kamehameha Schools/Bernice Pauahi Bishop Estate

17 UNITED STATES DISTRICT COURT
18 EASTERN DISTRICT OF CALIFORNIA
19

20 ERIC GRANT,
21 Plaintiff,
22 v.
23 KAMEHAMEHA SCHOOLS/BERNICE PAUAAHI
24 BISHOP ESTATE; et al.,
25 Defendants.

26 And Related Cross and Counterclaims.
27
28

CASE NO. 2:08-cv-00672-FCD-KJM

DECLARATION OF LOUISE K. Y. ING IN
SUPPORT OF KAMEHAMEHA SCHOOLS
DEFENDANTS AND CROSS-CLAIM
DEFENDANTS' MOTION TO TRANSFER
TO DISTRICT OF HAWAII PURSUANT TO
28 U.S.C. § 404; EXHIBITS A-C

Date: October 31, 2008

Time: 10:00 a.m.

Courtroom: 2

Before: Hon. Frank C. Damrell, Jr.

1 **DECLARATION OF LOUISE K. Y. ING IN SUPPORT OF KAMEHAMEHA SCHOOLS**
2 **DEFENDANTS AND CROSS-CLAIM DEFENDANTS' MOTION TO TRANSFER TO**
3 **DISTRICT OF HAWAII PURSUANT TO 28 U.S.C. § 404**

4 I, LOUISE K. Y. ING, declare as follows:

5 1. I am a shareholder and director in the law firm of Alston Hunt Floyd & Ing, co-counsel in
6 this action for defendants and cross-claim defendants Kamehameha Schools/Bernice Pauahi Bishop and
7 J. Douglas Ing, Nainoa Thompson, Diane J. Plotts, Robert K.U. Kihune, and Corbett A.K. Kalama in
8 their capacities as Trustees of the Kamehameha Schools/Bernice Pauahi Bishop Estate (collectively
9 “KS”).

10 2. I make this declaration based upon personal knowledge and am competent to testify to
11 the matters stated in this declaration.

12 3. Attached as Exhibit A is a true and correct copy of the Complaint which my firm filed on
13 behalf of KS against John Doe and Jane Doe in the Third Circuit Court of the State of Hawaii, on
14 August 6, 2008. The Complaint arises out of the Does' breach of the confidentiality provisions of their
15 settlement agreement with KS, the same settlement agreement which is the subject of this pending suit
16 filed by Eric Grant.

17 4. Attached as Exhibit B is a true and correct copy of the Declaration of James Banks in
18 Support of Motion to Compel Further Response to Request for Production, etc., filed April 22, 2008, in
19 *Grant v. Goemans*, Case No. 07AS04172 (Cal. Sup'r Ct) (“*Grant v. Goemans*”). As part of our case
20 preparation, our co-counsel in California at the Bingham McCutchen firm obtained relevant court filings
21 from Mr. Grant's California state court suit against John Goemans and sent us a set, including Exhibit B.

22 5. Attached as Exhibit C is a true and correct copy of excerpts from the Memorandum in
23 Support of Motion to Compel Further Response to Request for Production, etc., filed April 22, 2008, in
24 *Grant v. Goemans*. We obtained the full copy of this Memorandum from our California co-counsel at
25 the Bingham McCutchen firm.

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