

**From:** [Alan Beck](#)  
**To:** [Paralegal 1](#); [Kevin O'Grady](#)  
**Subject:** Fwd: [EXTERNAL] Notice of TRO Pursuant to Rule 65 of FRCP  
**Date:** Thursday, June 22, 2023 11:12:13 PM

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----- Forwarded message -----

**From:** **Thomas Kolbe** <[Thomas.Kolbe@co.maui.hi.us](mailto:Thomas.Kolbe@co.maui.hi.us)>  
**Date:** Thu, Jun 22, 2023 at 6:51 PM  
**Subject:** RE: [EXTERNAL] Notice of TRO Pursuant to Rule 65 of FRCP  
**To:** Victoria Takayesu-hamilton <[Victoria.Takayesu-hamilton@co.maui.hi.us](mailto:Victoria.Takayesu-hamilton@co.maui.hi.us)>, <[alan.alexander.beck@gmail.com](mailto:alan.alexander.beck@gmail.com)>  
**Cc:** corpcoun <[corpcoun@co.maui.hi.us](mailto:corpcoun@co.maui.hi.us)>

Hi Alan, for now, please respond to both Victoria (Tori) and me. I did not see any attachments to your email and understood that it was just a notice that the TRO filing would be forthcoming. If we are missing something, please resend. thanks

**From:** Alan Beck <[alan.alexander.beck@gmail.com](mailto:alan.alexander.beck@gmail.com)>  
**Sent:** Thursday, June 22, 2023 3:41 PM  
**To:** Victoria Takayesu-hamilton <[Victoria.Takayesu-hamilton@co.maui.hi.us](mailto:Victoria.Takayesu-hamilton@co.maui.hi.us)>  
**Cc:** Thomas Kolbe <[Thomas.Kolbe@co.maui.hi.us](mailto:Thomas.Kolbe@co.maui.hi.us)>; corpcoun <[corpcoun@co.maui.hi.us](mailto:corpcoun@co.maui.hi.us)>; [Caron.M.Inagaki@hawaii.gov](mailto:Caron.M.Inagaki@hawaii.gov); [nicholas.mclean@hawaii.gov](mailto:nicholas.mclean@hawaii.gov); [Robert.T.Nakatsuji@hawaii.gov](mailto:Robert.T.Nakatsuji@hawaii.gov); [kevin@kevinogradylaw.com](mailto:kevin@kevinogradylaw.com)  
**Subject:** Re: [EXTERNAL] Notice of TRO Pursuant to Rule 65 of FRCP

Dear Victoria.

Since you responded, unless corrected, I will assume you are the correct person to send the TRO to. Thank you for your response. However, I did notice that the email was blank. Did something get omitted?

-Alan

On Thu, Jun 22, 2023 at 6:35 PM Victoria Takayesu-hamilton <[Victoria.Takayesu-hamilton@co.maui.hi.us](mailto:Victoria.Takayesu-hamilton@co.maui.hi.us)> wrote:

Victoria J. Takayesu

Corporation Counsel

Department of the Corporation Counsel

200 S. High Street

Wailuku, HI 96793

Ph. (808) 270-7740

Fax: [\(808\) 270-7152](tel:(808)270-7152)

email: [victoria.takayesu-hamilton@co.maui.hi.us](mailto:victoria.takayesu-hamilton@co.maui.hi.us)

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**From:** McLean, Nicholas <[nicholas.mclean@hawaii.gov](mailto:nicholas.mclean@hawaii.gov)>

**Sent:** Thursday, June 22, 2023 11:45 AM

**To:** Sonya Toma <[Sonya.H.Toma@co.maui.hi.us](mailto:Sonya.H.Toma@co.maui.hi.us)>; Victoria Takayesu-hamilton <[Victoria.Takayesu-hamilton@co.maui.hi.us](mailto:Victoria.Takayesu-hamilton@co.maui.hi.us)>; [CORPCOUN@mauicounty.gov](mailto:CORPCOUN@mauicounty.gov) corpcoun <[corpcoun@co.maui.hi.us](mailto:corpcoun@co.maui.hi.us)>; Alan Beck <[alan.alexander.beck@gmail.com](mailto:alan.alexander.beck@gmail.com)>; Caron M Inagaki <[Caron.M.Inagaki@hawaii.gov](mailto:Caron.M.Inagaki@hawaii.gov)>; Robert T Nakatsuji <[Robert.T.Nakatsuji@hawaii.gov](mailto:Robert.T.Nakatsuji@hawaii.gov)>; Kevin O'Grady <[kevin@kevinogradylaw.com](mailto:kevin@kevinogradylaw.com)>

**Subject:** RE: [EXTERNAL] Notice of TRO Pursuant to Rule 65 of FRCP

Hi Alan,

Thank you for letting us know. We acknowledge receipt of your email. As we discussed, please send a courtesy copy of any filings to me by email.

Please don't hesitate to reach out if you have any questions.

Best regards,

Nick

**Nicholas M. McLean**

First Deputy Solicitor General

Department of the Attorney General | Ka 'Oihana O Ka Loio Kuhina

State of Hawai'i

Phone: 808.586.1360

Email: [nicholas.mclean@hawaii.gov](mailto:nicholas.mclean@hawaii.gov)

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**From:** Alan Beck <[alan.alexander.beck@gmail.com](mailto:alan.alexander.beck@gmail.com)>

**Sent:** Thursday, June 22, 2023 4:18 AM

**To:** Inagaki, Caron M <[Caron.M.Inagaki@hawaii.gov](mailto:Caron.M.Inagaki@hawaii.gov)>; Nakatsuji, Robert T <[Robert.T.Nakatsuji@hawaii.gov](mailto:Robert.T.Nakatsuji@hawaii.gov)>; McLean, Nicholas <[nicholas.mclean@hawaii.gov](mailto:nicholas.mclean@hawaii.gov)>; [Sonya.h.toma@co.maui.hi.us](mailto:Sonya.h.toma@co.maui.hi.us); [Victoria.Takayesu-hamilton@co.maui.hi.us](mailto:Victoria.Takayesu-hamilton@co.maui.hi.us); [CORPCOUN@mauicounty.gov](mailto:CORPCOUN@mauicounty.gov); Kevin O'Grady <[kevin@kevinogradylaw.com](mailto:kevin@kevinogradylaw.com)>

**Subject:** [EXTERNAL] Notice of TRO Pursuant to Rule 65 of FRCP

Dear Counsel for Attorney General Lopez and the County of Maui;

Rule 65 of the Federal Rules of Civil Procedure requires that I give my opposing counsel notice prior to filing a temporary restraining order. Myself and Attorney Kevn O'Grady represent several residents of Maui who will be impacted by SB 1230's implementation on July 1st, 2023. Kevin and I plan on filing a restraining order against certain parts of SB 1230's sensitive places law later today. We are in the process of finalizing the motion and various associated documents. Once they are finalized, who should I send them to for Attorney General Lopez? And who should I send them to for the County of Maui?

Respectfully,

-Alan