

KOBAYASHI SUGITA & GODA, LLP

CHARLES W. GALL 4771  
First Hawaiian Center  
999 Bishop Street, Suite 2600  
Honolulu, Hawaii 96813  
Telephone: (808) 535-5700  
Facsimile: (808) 535-5799  
Email: [cwg@ksglaw.com](mailto:cwg@ksglaw.com)

Attorney for Respondent  
NSHE HI Narcissus, LLC



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 9**

IN THE MATTER OF:

NSHE HI Narcissus, LLC,  
Kahuku, Hawaii,  
  
Respondent.

DOCKET NO. UIC-09-2022-0058

RESPONDENT'S PREHEARING  
EXCHANGE

**RESPONDENT'S PREHEARING EXCHANGE**

Pursuant to the December 19, 2022, Order Granting Extension of Time in the matter of NSHE HI Narcissus, LLC, Complaint, Respondent, NSHE HI NARCISSUS, LLC, by and through their attorneys Kobayashi Sugita & Goda, LLP, hereby provides this Prehearing Exchange.

**I. Respondent's List of Witnesses to be Called at Hearing**

NSHE HI Narcissus, LLC intends to call the following witness at hearing: Subject to the same provisos and qualifications as expressed in the EPA's list of witnesses. Respondent

intends to call the Witnesses identified by the EPA, and hereby incorporates EPA's witness list as if fully set forth herein.

**II. Respondent's Exhibits**

NSHE HI Narcissus, LLC includes with this Prehearing Exchange a list of exhibits it may introduce into evidence. On March 9, 2023 Respondent provided the exhibits to Complainant and Region 9 Hearing clerk via email. Respondent NSHE Hi Narcissus, LLC reserves its rights to supplement this Prehearing Exchange pursuant to 40 C.F. R. Part 22.

DATED: Honolulu, Hawaii, March 9, 2023.

/s/ Charles W. Gall

CHARLES W. GALL

Attorney for Respondent  
NSHE HI NARCISSUS, LLC

**CERTIFICATE OF SERVICE**

The undersigned certifies that on the date indicated below this Prehearing Exchange and attachments, were served upon Complainant's attorneys, who has consented in writing to electronic service pursuant to 40 C.F.R. § 22.5(b)(2).

One copy via electronic mail to:

KIMBERLY WELLS  
Attorney Advisor  
United States Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

DARON RAVENBORG  
Attorney Advisor  
United States Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

Attorneys for Complainant

DATED: Honolulu, Hawaii, March 9, 2023.

/s/ Charles W. Gall  
CHARLES W. GALL

Attorney for Respondent  
NSHE HI NARCISSUS, LLC