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A Limited Liability Law Partnership

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FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

APR 26 2006  
at 2 o'clock and 56 min. P M  
SUE BEITIA, CLERK

Attorneys for Defendants  
SUSANNA F. CHEUNG, ANN K. HIGA, MARY REAVIS,  
and OPPORTUNITIES FOR THE RETARDED, INC.

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

HAWAII DISABILITY RIGHTS CENTER, a Hawaii corporation,	)	CIVIL NO. CV05-00557 DAE-LEK
	)	
Plaintiff,	)	
	)	
vs.	)	NOTICE OF MOTION; DEFENDANTS
SUSANNA F. CHEUNG, in her capacity as President and Chief Executive Officer of Opportunities for Retarded, Inc.; ANN K. HIGA, in her capacity as Vice President of Opportunities for the Retarded, Inc.; MARY REAVIS, in her capacity as Waiver Program Director of Opportunities for the Retarded, Inc.; and OPPORTUNITIES FOR THE RETARDED, INC., a Hawaii corporation,	)	SUSANNA F. CHEUNG, ANN K. HIGA, MARY REAVIS, AND OPPORTUNITIES FOR THE RETARDED, INC.'S MOTION FOR SUMMARY JUDGMENT; MEMORANDUM IN SUPPORT OF MOTION; CERTIFICATE OF COMPLIANCE; CERTIFICATE OF SERVICE
	)	<u>HEARING</u>
	)	DATE:
	)	TIME:
	)	JUDGE: Honorable David Alan Ezra
	)	TRIAL DATE:
Defendants.	)	
	)	

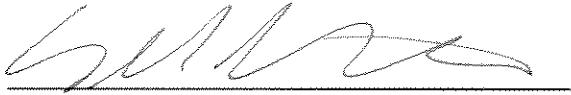
NOTICE OF MOTION

TO: LOUIS ERTECHIK, ESQ.  
900 Fort Street, Suite 1040  
Honolulu, Hawaii 96813

Attorney for Plaintiff  
**HAWAII DISABILITY RIGHTS CENTER**

NOTICE IS HEREBY GIVEN that Defendants Susanna F. Cheung, Ann K. Higa, Mary Reavis, and Opportunities for the Retarded, Inc.'s Motion for Summary Judgment shall come on for hearing before the **Honorable David Alan Ezra**, Judge of the above-entitled Court, in his courtroom in the PJKK Federal Building, 300 Ala Moana Boulevard, Honolulu, Hawaii, at \_\_\_\_\_, on \_\_\_\_\_, 2006, or as soon thereafter as counsel can be heard.

DATED: Honolulu, Hawaii, April 26, 2006.



JOHN T. KOMEIJI  
GREGG M. USHIRODA  
KAREN Y. ARIKAWA  
Attorneys for Defendants  
**SUSANNA F. CHEUNG, ANN K. HIGA,  
MARY REAVIS, AND OPPORTUNITIES FOR THE  
RETARDED, INC.**

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

HAWAII DISABILITY RIGHTS	)	CIVIL NO. CV05-00557 DAE-LEK
CENTER, a Hawaii corporation,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	DEFENDANTS SUSANNA F. CHEUNG,
	)	ANN K. HIGA, MARY REAVIS, AND
SUSANNA F. CHEUNG, in her	)	OPPORTUNITIES FOR THE RETARDED,
capacity as President and	)	INC.'S MOTION FOR SUMMARY
Chief Executive Officer of	)	JUDGMENT
Opportunities for Retarded,	)	
Inc.; ANN K. HIGA, in her	)	
capacity as Vice President of	)	
Opportunities for the	)	
Retarded, Inc.; MARY REAVIS,	)	
in her capacity as Waiver	)	
Program Director of	)	
Opportunities for the	)	
Retarded, Inc.; and	)	
OPPORTUNITIES FOR THE	)	
RETARDED, INC., a Hawaii	)	
corporation,	)	
	)	
Defendants.	)	
	)	
	)	

DEFENDANTS SUSANNA F. CHEUNG, ANN K. HIGA,  
MARY REAVIS, AND OPPORTUNITIES FOR THE RETARDED, INC.'S  
MOTION FOR SUMMARY JUDGMENT

Comes now Defendants SUSANNA F. CHEUNG, ANN K. HIGA,  
MARY REAVIS, AND OPPORTUNITIES FOR THE RETARDED, INC. ("ORI")  
(hereinafter collectively referred to as "Defendants") by and  
through their counsel, WATANABE ING & KOMEIJI LLP, and pursuant  
to Federal Rules of Civil Procedure Rule 56, hereby move for  
summary judgment as to all claims against them in Plaintiff

HAWAII DISABILITY RIGHTS CENTER's Complaint for Declaratory and Injunctive Relief filed on August 25, 2005.

ORI brings this motion in accordance with Rules 7 and 56 of the Federal Rules of Civil Procedure and all applicable local rules of practice for the United States District Court for the District of Hawaii, and bases it upon the attached memorandum in support of its motion, and the entire record herein.

DATED: Honolulu, Hawaii, April 26, 2006.



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JOHN T. KOMEIJI  
GREGG M. USHIRODA  
KAREN Y. ARIKAWA  
Attorneys for Defendants  
**SUSANNA F. CHEUNG, ANN K. HIGA,  
MARY REAVIS, AND OPPORTUNITIES FOR  
THE RETARDED, INC.**