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

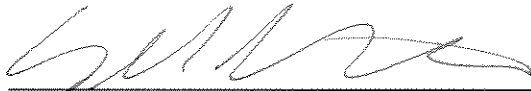
NOTICE OF MOTION

TO: LOUIS ERTESCHIK, 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.



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.**