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NO. CAAP-24-0000323

IN THE INTERMEDIATE COURT OF APPEALS

STATE OF HAWAI‘I

NONHUMAN RIGHTS PROJECT, INC., on behalf of Mari and Vaigai, individuals,

Petitioner-Appellant,

vs.

CITY AND COUNTY OF HONOLULU, DEPARTMENT OF ENTERPRISE SERVICES and its DIRECTOR, DITA HOLIFIELD, and the HONOLULU ZOO DIRECTOR, LINDA SANTOS,

Respondents-Appellees.

Civil Case No.: 1CCV-23-0001418 (GWBC)
(Circuit Court Appeal)

RESPONDENTS-APPELLEES' MEMORANDUM IN OPPOSITION TO PETITIONER-APPELLANT'S MOTION FOR RETENTION OF ORAL ARGUMENT

APPEAL FROM THE:

(1) FINAL JUDGMENT, dated March 25, 2024;

(2) ORDER GRANTING RESPONDENTS' MOTION TO DISMISS, dated March 25, 2024;

(3) ORDER REJECTING MOTION FOR ADMISSION TO APPEAR *PRO HAC VICE* FOR JAKE DAVIS, dated March 25, 2024.

FIRST CIRCUIT COURT

HONORABLE GARY W.B. CHANG

I do hereby certify that the foregoing is a full, true and correct copy of the official record on file in the Supreme Court of the State of Hawai`i
Dated at: Honolulu, Hawai`i 10-DEC-2025, /s/ Elizabeth Zack, Clerk of the Supreme Court, State of Hawai`i

RESPONDENTS-APPELLEES CITY & COUNTY OF HONOLULU DEPARTMENT OF ENTERPRISE SERVICES AND ITS DIRECTOR, DITA HOLIFIELD, AND THE HONOLULU ZOO DIRECTOR, LINDA SANTOS' MEMORANDUM IN OPPOSITION TO PETITIONER-APPELLANT'S MOTION FOR RETENTION OF ORAL ARGUMENT

Pursuant to HRAP 27(a), Respondents-Appellees City and County of Honolulu Department of Enterprise Services and its Director, Dita Holifield, and the Honolulu Zoo Director, Linda Santos ("City") hereby submit their memorandum in opposition to Petitioner-Appellant's Motion for Retention of Oral Argument (Dkt. 57).

The instant appeal presents a simple and straightforward legal question that is fully addressed by the parties' briefs. Oral argument would not assist the Court: there is nothing more to be fleshed out in oral argument that is not already covered in the briefs. Given the Court's voluminous caseload, the City respectfully submits that oral argument would be an inefficient use of the Court's limited resources.

DATED: Honolulu, Hawai'i, December 9, 2025.

DANA M.O. VIOLA
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By: */s/ Jacqueline M. de Leeuw Huang*
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Attorneys for Respondents-Appellees

NO. CAAP-24-0000323

IN THE INTERMEDIATE COURT OF APPEALS

STATE OF HAWAII

NONHUMAN RIGHTS PROJECT, INC., on behalf of Mari and Vaigai, individuals, Petitioner-Appellant, vs. CITY AND COUNTY OF HONOLULU, DEPARTMENT OF ENTERPRISE SERVICES and its DIRECTOR, DITA HOLIFIELD, and the HONOLULU ZOO DIRECTOR, LINDA SANTOS, Respondents-Appellees.	CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, a copy of the foregoing document was served upon the following person(s) via electronic filing in the Judiciary Electronic Filing and Service System (JEFS):

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*(*Pro Hac Vice* application forthcoming)

Attorneys for Petitioner-Appellant
Nonhuman Rights Project, Inc.,
on behalf of Mari and Vaigai

DATED: Honolulu, Hawai‘i, December 9, 2025;

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