

Margaret Wille
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March 3, 2016

FILED
CIRCUIT COURT OF
THE THIRD CIRCUIT
STATE OF HAWAII

2016 MAR -3 PM 2:37

CLERK L. GLASGOW

Honorable Ronald Ibarra
Circuit Court of the Third Circuit
Keakealani Bldg., Rm. 240
79-1020 Haukapila Street
Kealahou, HI 96750

Hester v. Horowitz Civ. No. 05-1- 0196
Re: Correspondence from the Court

I am writing to inquire about the delay in the signing of the proposed Fifth Amended Final Judgment in the above referenced case.

On January 20, 2016, the Intermediate Court of Appeals dismissed the appeal of Civ. 05-1-0196, CAAP 0000658, for lack of compliance of the Fourth Amended Final Judgment with HRCP Rule 58 and the *Jenkins* decision.

On January 25th, consistent with the Hawaii Rules of Circuit Court Rule 23, I served opposing Counsel a draft Fifth Amended Final Judgment, that was in compliance with the appellate court's decision, to provide opposing counsel with the opportunity to object or comment on the draft. There was no response from opposing counsel, signaling concurrence with the proposed draft.

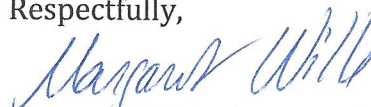
On February 5th, I submitted a copy of that agreed upon proposed Fifth Amended Final Judgment for the Court's review and signing, and as well served a court stamped copy on opposing counsel.

In light of the inordinate number of amended final judgments, a delay in entering the Fifth Amended Final Judgment is particularly concerning. What is the reason for this delay? Defendants are being unduly held up from re-submitting their appeal.

I am especially concerned about this delay given that the Court recently denied Defendants' request to stay the parallel action Civ. 14-1-0304 pending conclusion of the prior filed instant case Civ. 05-1-0196.

A prompt response will be appreciated.

Respectfully,



Margaret Wille, Attorney for Defendants

cc: Paul J. Sulla, Jr. Attorney for Plaintiff

Margaret (Dunham) Wille #8522
Attorney at Law
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Tel: 808-854-6931
margaretwille@mac.com

Attorney for Defendants

**IN THE CIRCUIT COURT OF THE THIRD CIRCUIT
KONA DIVISION, STATE OF HAWAII**

JASON HESTER, an individual
Plaintiff,

v.

LEONARD G. HOROWITZ, an
individual; SHERRI KANE, an
individual; MEDICAL VERITAS
INTERNATIONAL, INC, a
California nonprofit corporation;
THE ROYAL BLOODLINE OF
DAVID, a Washington Corporation
Sole; JOHN DOES, 1-10, JANE
DOES 1-10, DOE ENTITIES 1-10,
DOE PARTNERSHIPS 1-10, DOE
GOVERNMENTAL UNITS 1-10.
Defendants

CIV. NO. 14-1-0304
(Other Civil Action)

DEFENDANTS' MOTION FOR
STAY PENDING APPEAL
[HRCP 62(d)] AND FOR THE
SETTING OF SUPERSEDEAS
BOND SECURITY DURING THE
PERIOD OF THE APPEAL:
AFFIDAVIT OF LEONARD G.
HOROWITZ; DECLARATION OF
ATTORNEY MARGARET WILLE;
NOTICE OF HEARING;
CERTIFICATE OF SERVICE

Judge: Honorable Melvin H. Fujino

Hearing date: April 21, 2016
Time of hearing: 8 a.m.
Date of Trial: none

**MOTION TO STAY PENDING APPEAL [HRCP 62(d)]
AND FOR SETTING OF SUPERSEDEAS BOND SECURITY
DURING THE PERIOD OF THE APPEAL**

COMES NOW Defendants/Counterclaimants LEONARD G. HOROWITZ, SHERRI KANE,
and THE ROYAL BLOODLINE OF DAVID (RBOD)¹, hereafter collectively referred to as

¹ MEDICAL VERITAS INTERNATIONAL, INC. (MVI) is a California based non-profit that was RBOD's lessee of the subject property. Despite the errors related to the default of the corporate Defendants, given its limited interest in the subject property, MVI is not pursuing this Motion for a Stay or Alternatively Dismissal or a New Trial.

CLERK L. GLASGOW

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FILED
CIRCUIT COURT OF
THE THIRD CIRCUIT
STATE OF HAWAII

Defendants, by and through their attorney MARGARET WILLE, pursuant to Hawaii Rules of Civil Procedure (HRCP) Rule 62(d) moves this Court for a stay and setting of supersedeas bond security pending appeal to the Intermediate Court of Appeals.

HRCP 62(d) provides:

Stay upon appeal. When an appeal is taken the appellant by giving a supersedeas bond may obtain a stay subject to the exceptions contained in subdivision (a) of this rule. The bond may be given at or after the time of filing the notice of appeal or of procuring the order allowing the appeal, as the case may be. The stay is effective when the supersedeas bond is approved by the court.

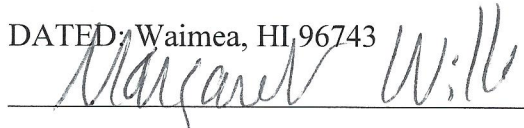
Defendants intend to appeal the instant case. They previously sought a stay under HRCP 62(b), pending the conclusion in the related judicial foreclosure case Civ. 05-1-0196 and pending Defendants' Motion for Reconsideration or Alternatively for a New Trial. The Court heard those motions on February 26th, 2016, and orally denied all motions. Entry of a final judgment is expected shortly. Without a stay pending appeal, Defendants' home will be taken from them during the period of the appeal.

Defendants ask that bond security be set at \$6000 based on residential rent at \$500 a month for eight months plus \$1000 for court costs and related expenses, and that otherwise an evidentiary hearing on this issue be held.

This motion is made pursuant to HRCP 7(b) "Motions and Other Papers", HRCP 62 "Stay of Proceedings to Enforce a Judgment", as well as Rules 3, 7, 7.1, and 7.2 of the Rules of the Circuit Court of the State of Hawaii, and is based upon and supported by the Affidavit of Leonard G. Horowitz, the Declaration of Attorney Margaret Wille, the Memorandum in Support of the Motion, all exhibits attached hereto, and the record in this case.

DATED: Waimea, HI 96743

March 3, 2016


MARGARET WILLE, attorney for Defendants

Hester vs Horowitz Civ. 14-1-0304, Defendants' Motion For Stay Pending Appeal [HRCP 62(d)] And For The Fixing Of Supersedeas Bond Or Other Appropriate Security During The Period Of The Appeal

Margaret (Dunham) Wille #8522
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Tel: 808-854-6931
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Attorney for Defendants

**IN THE CIRCUIT COURT OF THE THIRD CIRCUIT
KONA DIVISION, STATE OF HAWAII**

JASON HESTER, an individual)	CIV. NO. 14-1-0304
Plaintiff,)	(Other Civil Action)
v.)	
)	
LEONARD G. HOROWITZ, an)	MEMORANDUM IN SUPPORT OF
individual; SHERRI KANE, an)	DEFENDANTS' MOTION FOR STAY
individual; MEDICAL VERITAS)	PENDING APPEAL
INTERNATIONAL, INC, a California)	AND FOR SETTING SUPERSEDEAS
nonprofit corporation; THE ROYAL)	BOND SECURITY DURING THE
BLOODLINE OF DAVID, a)	PERIOD OF THE APPEAL [HRCP
Washington Corporation Sole; JOHN)	62(d)]: AFFIDAVIT OF LEONARD G.
DOES, 1-10, JANE DOES 1-10, DOE)	HOROWITZ; DECLARATION OF
ENTITIES 1-10, DOE)	ATTORNEY MARGARET WILLE;
PARTNERSHIPS 1-10, DOE)	CERTIFICATE OF SERVICE
GOVERNMENTAL UNITS 1-10.)	
Defendants)	Judge: Honorable Melvin H. Fujino
		Hearing date: April 21, 2016
		Time of hearing: 8 a. m.
		Date of Trial: none

**MEMORANDUM IN SUPPORT OF
DEFENDANTS' MOTION FOR STAY PENDING APPEAL
AND FOR SETTING SUPERSEDEAS BOND SECURITY
DURING THE PERIOD OF THE APPEAL [HRCP 62(d)]**

This memorandum is written in support of Defendants' Motion For Stay Pending Appeal And For Setting Supersedeas Bond Security During The Period Of The Appeal.

Hawaii Rule of Civil Procedure (HRCP) Rule 62(d) provides:

Stay upon appeal. When an appeal is taken the appellant by giving a supersedeas bond may obtain a stay subject to the exceptions contained in subdivision (a) of this rule. The bond may be given at or after the time of filing the notice of appeal or of procuring the order allowing the appeal, as the case may be. The stay is effective when the supersedeas bond is approved by the court.

LEGAL FRAMEWORK: Whether to grant a supersedeas bond or security pending an appeal is a matter committed to the discretion of the Court but this discretion is not unlimited. As explained in *Midkiff vs. de Bisschop* 58 Haw. 548, 550, 574, P.2d 128, 131 (Haw. 1978), the bond amount shall not be used to discourage an appeal. In the case of real estate, the amount of the bond is the amount which the non-moving party is out because of delay in securing the property based on reasonable rental value. As explained in *Midkiff*:

Proper exercise of its discretion in fixing the amount of the supersedeas bond in this case required the circuit court to determine what damages for delay the Appellees might reasonably be expected to be able to establish with adequate certainty in the event the appeal were to be resolved in their favor. *Ibid*.

FACTUAL MATTERS:

A. Factors appropriate for the Court to consider in determining whether to grant a stay include:

- Defendants purchased the property in 2004 from the original Seller-mortgagee Loran Lee and timely paid monthly mortgage payments on the \$350,000 mortgage;
- In less than a year Plaintiff Lee brought an action for foreclosure, Civ. 05-1-0196, based primarily on non-substantial claims relating to making improvements on the property and relating to failure to maintain insurance although the insurance was unavailable given the location in a Lava 1 Hazard Zone; the Court denied foreclosure.
- Plaintiff made numerous misrepresentations concerning the property to begin with that it was being sold “without any encumbrances” – despite a lien on the property as a result of a prior successful lawsuit for fraud against Seller-mortgagee Lee for attempting to sell the same property despite a federal lien related to federal drug trafficking charges;

- In Civ. 05-1-0196, this Court in its Final Judgment and its Amended Final Judgment denied foreclosure and adjudged a \$200,000 jury verdict of damages awarded to Defendant Horowitz, following which Defendant Horowitz paid in full the remaining principal and interest due on the mortgage;
- Civ. 05-1-0196, is still on-going resulting from this Court's subsequent vacation of that damages award following a HRCF Rule 60(b) motion, despite Defendants having already paid off the remainder of the mortgage less the \$200,000 credit for the damages award;
- That HRCF Rule 60(b) vacation of the jury award occurred after Plaintiff Seller-mortgagee Lee's death, and following the substitution of Plaintiff Lee by Jason Hester – who falsely claimed to be the nephew of Loran Lee and by way of a convoluted scheme of transfers that included documented alteration of incorporation filings with the State;
- The HRCF Rule 60(b) vacation of the jury award was based on the Court granting a post judgment HRCF Rule 50 Motion for Judgment as a matter of law, despite failure of Plaintiff's attorney to comply with the Rule 50 prerequisite of first having brought the motion prior to the case being given to the jury;
- Although Civ. 05-1-0196 was and is still pending, by way of a later filed non-judicial foreclosure action followed by this 2014 quiet title action, the result is the instant case is in direct conflict with the judgment denying foreclosure in the prior filed Civ. 05-1-0196.
- In the non-judicial foreclosure that was the basis for this quiet title action there are serious factual and legal issues in dispute (such as Plaintiff's failure to comply with the mandatory notice provisions required of non-judicial foreclosure actions under HRS § 667-5);
- In the underlying non-judicial foreclosure case, the adjudication essentially came to a halt following the default judgment of Defendant Horowitz's ecclesiastical non-profit corporation Royal Bloodline of David, despite serious questions concerning this Court's refusal to vacate the default judgment;
- Most importantly, in the instant case, Defendants have submitted significant evidence to show that this legal action is part of a scam operation to defraud Defendants of their home carried out initially by the original seller – mortgagee Cecil Lee, in whose shoes successor in interest seller-mortgagee Plaintiff Hester stands to acquire the subject property despite evidence false representation of his familial relationship to original seller-mortgagee Cecil Lee, the convoluted transfer of the claimed property interest to Plaintiff Hester by way of altered documents

submitted to the state, and serious questions concerning Plaintiff's Hester's legitimacy and standing.

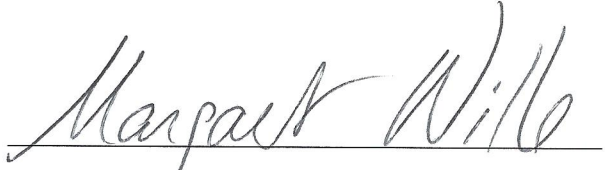
- Absent reversal of this case, although in name Plaintiff Hester, with no prior relationship to the property or to his predecessor in interest Plaintiff Lee, nor any fiscal contribution to the property (other than perhaps a single payment of property taxes), would acquire the subject property, Instead, as the surety to Plaintiff Hester by way of a security interest in the property for \$50,000 it is likely attorney Paul Sulla, Jr. who will acquire the subject property.

For these reasons, this Circuit Court is asked to allow for a stay – rather than being the vehicle to allow the victims of what very much has the character of a swindle, from being kicked out of their home.

B. Factors appropriate to take into consideration in determining the appropriate amount of any bond:

Consistent with the above referenced case of *Midkiff*, the factors appropriate to take into consideration in determining the appropriate amount of any bond in the case of this real property is the amount of damages for the delay plus anticipated court costs. A reasonable estimate in this case is \$5000: consisting of \$4000 (eight months of rent at \$500 per month) plus \$1000 in Court costs and related expenses. In the event Plaintiff Hester is not agreeable to this proposed bond security, Defendants ask that Plaintiff Hester himself demonstrate the reasonably anticipated amount of damages to cover for the delay in acquisition of the property in an evidentiary hearing.

DATED: Waimea, HI 96743 March 3, 2016


MARGARET WILLE, Attorney for Defendants

Hester vs Horowitz Civ. 14-1-0304, Memorandum In Support Of Defendants' Motion For Stay Pending Appeal [HRCp 62(d)] And For The Fixing Of Supersedeas Bond Or Other Appropriate Security During The Period Of The Appeal

Margaret (Dunham) Wille #8522

Attorney at Law
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Attorney for:
Defendants/Counterclaimants
Leonard G. Horowitz, Sherri Kane and
the Royal Bloodline of David, et. al.

**IN THE CIRCUIT COURT OF THE THIRD CIRCUIT
KONA DIVISION, STATE OF HAWAII**

JASON HESTER, an individual)	CIV. NO. 14-1-0304
Plaintiff/Counterclaim Defendant)	(Other Civil Action)
v.)	
LEONARD G. HOROWITZ, an)	DECLARATION OF ATTORNEY
individual; SHERRI KANE, an)	MARGARET WILLE
individual; MEDICAL VERITAS)	in support of
INTERNATIONAL, INC, a)	
California nonprofit corporation; THE)	DEFENDANTS' MOTION FOR
ROYAL BLOODLINE OF DAVID, a)	STAY PENDING APPEAL
Washington Corporation Sole; JOHN)	[HRCP 62(d)] AND FOR THE SETTING OF
DOES, 1-10, JANE DOES 1-10, DOE)	SUPERSEDEAS BOND SECURITY DURING THE
ENTITIES 1-10, DOE)	PERIOD OF THE APPEAL; DEFENDANTS'
PARTNERSHIPS 1-10, DOE)	MEMORANDUM IN SUPPOT OF DEFENDANTS'
GOVERNMENTAL UNITS 1-10.)	MOTION FOR
)	STAY PENDING APPEAL
)	[HRCP 62(d)] AND FOR THE SETTING OF
Defendants/Counterclaimants)	SUPERSEDEAS BOND SECURITY DURING THE
)	PERIOD OF THE APPEAL; AFFIDAVIT OF
)	LEONARD G. HOROWITZ; DECLARATION OF
)	ATTORNEY MARGARET WILLE

Judge: Honorable Melvin H. Fujino

Hearing date: April 21, 2016

Time of hearing: 8 a.m.

Date of Trial: none

**DECLARATION OF ATTORNEY MARGARET D. WILLE
IN SUPPORT OF MOTION TO STAY PENDING APPEAL [HRCP 62(d)]
AND FOR SETTING OF SUPERSEDEAS BOND SECURITY
DURING THE PERIOD OF THE APPEAL**

I, MARGARET (DUNHAM) WILLE, under pain of perjury of law, do hereby state and declare as follows:

- 1) I am an individual over the age of twenty-one (21) years, a resident of the State and County of Hawai'i.
- 2) I am licensed to practice law before the Courts of Hawai'i.
- 3) As of June 29, 2015, I have been the attorney for Defendant-Appellants LEONARD G. HOROWITZ and SHERRI KANE and THE ROYAL BLOODLINE OF DAVID and am representing these Defendants in this case, Civ. 14-1-0304, and in the related case Civ. 05-1-0196.
- 4) All of the statements made in "Defendants' Motion For Stay Pending Appeal [HRCD 62(d)] And For The Setting Of Supersedeas Bond Security During The Period Of The Appeal" are true and correct to the best of my knowledge and belief.

FURTHER DECLARANT SAYETH NAUGHT

This Declaration is based upon my personal knowledge and I am competent to testify as to the truth of the statements contained herein.

Dated: Waimea Hawai'i March 3, 2016

Signed: Margaret Wille
MARGARET (DUNHAM) WILLE
Attorney for Defendants

Jason Hester vs Leonard G. Horowitz et al; Civ. 14-1-0304; Declaration of Attorney Margaret Wille For Defendants' Reply To Plaintiff's Memorandum In Opposition To Defendants' Motion For Stay [HRCP 62(b)] Pending The Disposition Of Defendants' Post Judgment Motions

Margaret (Dunham) Wille #8522

Attorney at Law

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margaretwille@mac.com

Attorney for:

Defendants/Counterclaimants

Leonard G. Horowitz, Sherri Kane and

the Royal Bloodline of David, et. al.

**IN THE CIRCUIT COURT OF THE THIRD CIRCUIT
KONA DIVISION, STATE OF HAWAII**

JASON HESTER, an individual
Plaintiff/Counterclaim Defendant

v.

LEONARD G. HOROWITZ, an
individual; SHERRI KANE, an
individual; MEDICAL VERITAS
INTERNATIONAL, INC, a
California nonprofit corporation; THE
ROYAL BLOODLINE OF DAVID, a
Washington Corporation Sole; JOHN
DOES, 1-10, JANE DOES 1-10, DOE
ENTITIES 1-10, DOE
PARTNERSHIPS 1-10, DOE
GOVERNMENTAL UNITS 1-10.

Defendants/Counterclaimants

) CIV. NO. 14-1-0304
) (Other Civil Action)
)
) AFFIDAVIT OF LEONARD G. HOROWITZ
) in support of:
)
) DEFENDANTS' MOTION FOR
) STAY PENDING APPEAL
) [HRCp 62(d)] AND FOR THE SETTING OF
) SUPERSEDEAS BOND SECURITY DURING THE
) PERIOD OF THE APPEAL: DEFENDANTS'
) MEMORANDUM IN SUPPORT OF DEFENDANTS'
) MOTION FOR
) STAY PENDING APPEAL
) [HRCp 62(d)] AND FOR THE SETTING OF
) SUPERSEDEAS BOND SECURITY DURING THE
) PERIOD OF THE APPEAL; AFFIDAVIT OF
) LEONARD G. HOROWITZ; DECLARATION OF
) ATTORNEY MARGARET WILLE

Judge: Honorable Melvin H. Fujino

Hearing date: April 21, 2016

Time of hearing: 8 a.m.

Date of Trial: none

**AFFIDAVIT OF LEONARD G. HOROWITZ
IN SUPPORT OF MOTION TO STAY PENDING APPEAL [HRCF 62(d)]
AND FOR SETTING OF SUPERSEDEAS BOND SECURITY
DURING THE PERIOD OF THE APPEAL**

I, LEONARD G. HOROWITZ, under pain of perjury of law, do hereby state and declare as follows:

- 1) I am an individual over the age of twenty-one (21) years, a resident of the State and County of Hawai'i.
- 2) I am the principal Defendant in the afore-captioned case.
- 3) As of June 29, 2015, I have been represented by attorney Margaret Wille in this case, Civ. 14-1-0304, and in the related case Civ. 05-1-0196.
- 4) All of the statements made in "Defendants' Motion For Stay Pending Appeal [HRCF 62(d)] And For The Setting Of Supersedeas Bond Security During The Period Of The Appeal" are true and correct to the best of my knowledge and belief.

FURTHER AFFIANT SAYETH NAUGHT

This AFFIDAVIT is based upon my personal knowledge and I am competent to testify as to the truth of the statements contained herein.

Dated: Hilo, Hawai'i March 3, 2016

Signed: _____

LEONARD G. HOROWITZ
Defendant

On this 3RD day of March, 2016, before me, the undersigned notary public, personally appeared LEONARD G. HOROWITZ, who proved to me on the basis of satisfactory evidence of identification to be the person whose name is signed on the preceding or attached document, who swore or affirmed to me that the contents of the document(s) is/are truthful and accurate to the best of his knowledge and belief.

Subscribed and sworn to before me this

3rd day of March, 2016

B. Martinez

(SEAL)

Notary Public in and for Hawaii

NOTARY PUBLIC CERTIFICATION

B. Martinez

Third Judicial Circuit

Doc. Description:

Affidavit of Leonard G. Horowitz

My commission expires: 03/07/2018

No. of Pages: 3

Date of Doc. 3/03/16

Notary Signature

Date

Notary Signature

AFFIX SEAL HERE

Total number of pages: 3.

Hester vs Horowitz Civ. 14-1-0304, *Defendants' Motion For Stay Pending Appeal [HRCF 62(d)] And For The Fixing Of Supersedeas Bond Or Other Appropriate Security During The Period Of The Appeal*

Margaret Wille #8522
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margaretwille@mac.com

Attorney for:
Defendants/Counterclaimants
Leonard G. Horowitz, Sherri Kane, and
the Royal Bloodline of David

IN THE CIRCUIT COURT OF THE THIRD CIRCUIT
STATE OF HAWAII

JASON HESTER, an individual
Plaintiff/Counterclaim Defendant
v.

LEONARD G. HOROWITZ, an
individual; SHERRI KANE, an
individual; MEDICAL VERITAS
INTERNATIONAL, INC, a California
nonprofit corporation; THE ROYAL
BLOODLINE OF DAVID, a
Washington Corporation Sole; JOHN
DOES, 1-10, JANE DOES 1-10, DOE
ENTITIES 1-10, DOE
PARTNERSHIPS 1-10, DOE
GOVERNMENTAL UNITS 1-10.

Defendants/Counterclaimants

) CIV. NO. 14-1-0304
) (Quiet Title)
)
)
) **NOTICE OF HEARING**
) DEFENDANTS' MOTION FOR
) STAY PENDING APPEAL
) [HRCP 62(d)] AND FOR THE SETTING
) OF SUPERSEDEAS BOND SECURITY
) DURING THE PERIOD OF THE APPEAL)
)
)
)
) JUDGE: Honorable Melvin Fujino
) Hearing date: April 21, 2016
) Hearing time: 8 a.m.
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NOTICE OF HEARING

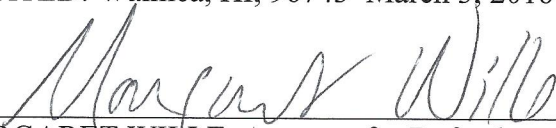
TO:

STEPHEN D. WHITTAKER
Attorney at Law
73-1459 Kaloko Drive
Kailua Kona, HI 96740
808-960-4536

Attorney for Jason Hester/Gospel of Believers

YOU ARE HEREBY NOTIFIED that the undersigned has filed with the above-captioned court the Defendants' Motion For Stay Pending Appeal [HRCF 62(d)] And For The Setting Of Supersedeas Bond Security During The Period Of The Appeal: Defendants' Memorandum In Support Of Defendants' Motion For Stay Pending Appeal [HRCF 62(d)] And For The Setting Of Supersedeas Bond Security During The Period Of The Appeal, with associated filings; and a hearing on this motion is scheduled on the captioned date and time. Pursuant to Hawaii Rules of Circuit Courts Rule 7(b) any response to this motion must be filed and served on opposing counsel no later than 8 days before the date of the hearing.

DATED: Waimea, HI, 96743 March 3, 2016


MARGARET WILLE, Attorney for Defendants
LEONARD G. HOROWITZ; SHERRI KANE;
and THE ROYAL BLOODLINE OF DAVID, et. al.

Jason Hester, Overseer The Office Of Overseer, Overseer For The Popular Assembly Of Revitalize, A Gospel Of Believers, Plaintiff v. Leonard G. Horowitz et al, Defendants; Civ. No. 14-1-0304 *NOTICE OF HEARING*

Margaret (Dunham) Wille #8522
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Attorney for Defendants

**IN THE CIRCUIT COURT OF THE THIRD CIRCUIT
KONA DIVISION, STATE OF HAWAII**

JASON HESTER, an individual)	CIV. NO. 14-1-0304
Plaintiff,)	(Other Civil Action)
v.)	
)	CERTIFICATE OF SERVICE for
LEONARD G. HOROWITZ, an)	
individual; SHERRI KANE, an)	DEFENDANTS' MOTION FOR
individual; MEDICAL VERITAS)	STAY PENDING APPEAL
INTERNATIONAL, INC, a)	[HRCP 62(d)] AND FOR THE
California nonprofit corporation; THE)	SETTING OF SUPERSEDEAS BOND
ROYAL BLOODLINE OF DAVID, a)	SECURITY DURING THE PERIOD
Washington Corporation Sole; JOHN)	OF THE APPEAL; DEFENDANTS'
DOES, 1-10, JANE DOES 1-10, DOE)	MEMORANDUM IN SUPPOT OF
ENTITIES 1-10, DOE)	DEFENDANTS' MOTION FOR
PARTNERSHIPS 1-10, DOE)	STAY PENDING APPEAL
GOVERNMENTAL UNITS 1-10.)	[HRCP 62(d)] AND FOR THE
Defendants)	SETTING OF SUPERSEDEAS BOND
		SECURITY DURING THE PERIOD
		OF THE APPEAL; AFFIDAVIT OF
		LEONARD G. HOROWITZ;
		DECLARATION OF ATTORNEY
		MARGARET WILLE

Judge: Honorable Melvin H. Fujino

Hearing date: April 21, 2016

Time of hearing: 8 a.m.

Date of Trial: none

CERTIFICATE OF SERVICE

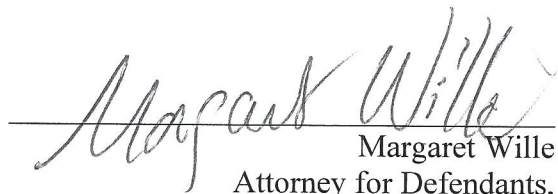
I HEREBY CERTIFY that on this 3rd day of March, 2016, I served a true and correct copy of the foregoing Defendants' Motion For Stay Pending Appeal [HRCP 62(d)] And For The Setting Of Supersedeas Bond Security During The Period Of The Appeal: Defendants' Memorandum In Support Of Defendants' Motion For Stay Pending Appeal [HRCP 62(d)] And For The Setting Of Supersedeas Bond Security During The Period Of The Appeal; Affidavit Of Leonard G. Horowitz; Declaration Of Attorney Margaret Wille, and this Certificate of Service, by the method described below to:

STEPHEN D. WHITTAKER
73-1459 Kaloko Drive
Kailua Kona, HI 96740
808-960-4536

 X U.S. Mail, Postage Prepaid

HONORABLE JUDGE MELVIN FUJINO
THE CIRCUIT COURT OF THE THIRD CIRCUIT
STATE OF HAWAII
79-1020 Haukapila Street
Kona, HI 96750

 X Hand Delivery
(via Hilo Court)


Margaret Wille
Attorney for Defendants,
Leonard G. Horowitz, Sherri Kane and
The Royal Bloodline of David

Hester vs. Horowitz et al Civ. No. 14-1-0304; *Certificate of Service For Defendants' Motion For Stay Pending Appeal [HRCP 62(d)] and For The Setting Of Supersedeas Bond Security During The Period Of The Appeal: Defendants' Memorandum In Support Of Defendants' Motion For Stay Pending Appeal [HRCP 62(d)] And For The Setting Of Supersedeas Bond Security During The Period Of The Appeal*