

EXHIBIT 1

Enroller: Please print your SSN: _____

Name: _____

Bargaining Unit: _____

Address: _____

HGEA/AFSCME Membership Application Form

Applicant: Type/print all information legibly and accurately in ink. Shaded areas are for office use only. Deliver or mail form to: HGEA/AFSCME, 888 Mililani St., Suite 601, Honolulu, HI 96813 or P.O. Box 2930, Honolulu, HI 96802-2930. Office telephone numbers: Oahu, 536-2351; Hawaii, 935-6841; Maui, 244-5508; Kauai, 245-6751.

Have you held HGEA/AFSCME membership before? If so, when (last date)?

Keyed: 7/1/95

Membership Information

1. Social Security Number

2. Member Type (see back of this form)

3. Bargaining Unit (see back)

4. Last Name

5. First Name

Middle Initial

6. Birth Date

7. Marital Status

8. Sex

Residence Address (P. O. Box and Route addresses are not acceptable as residence address)

9. Street Number

10. Street Name

11. Apt. No.

12. City

13. State

14. ZIP Code

15. ZIP Plus 4

Mailing Address (If mailing address is same as residence address, leave blank)

16. Street Number

17. Street Name

18. Apt. No.

19. City

20. State

21. ZIP Code

22. ZIP Plus 4

Other Information

23. Home Phone Number

24. Work Phone Number

☐ Democrat☐ Indep.☐ Republican☐ None

25. Political Party Affiliation

Spouse Information

26. Spouse Last Name

27. First Name

Middle Initial

28. Social Security Number

29. HGEA Member?

30. Birth Date

Employment Information (State and County employees, please provide a copy of your Personnel Action Form)EXCLUDED ONLY: Are you on the Excluded Managerial Compensation Plan? ☐ YES ☐ NO

31. Employment Date:

32a. Government Reporting Agency/Jurisdiction:

☒ State of Hawaii, including

Judiciary

Board of Education (Unit 06)

Board of Regents (Unit 08)

☐ City and County of Honolulu☐ Honolulu Board of Water Supply☐ County of Hawaii☐ County of Maui☐ County of Kauai☐ Retired (State Retirement System)☐ East-West Center☐ Federal **RA=G**

32b. Non-Government Employer:

☐ Private Sector **RA=G**☐ Non-Profit Organization **RA=G**☐ None of the Above **RA=G**

33. County Department Code

34. State Warrant Code

35. Employer Name

Address

City

State

ZIP

Membership Date:

07-01-95

Note:

N795

Coverage Type:

2

PM:

D

Amount \$

2957

I hereby apply for membership in HGEA/AFSCME, Local 152, AFL-CIO. I understand 1) that I must meet HGEA/AFSCME's membership eligibility requirements before membership is approved, 2) that approved membership will continue irrespective of personnel movements and until I submit written resignation of membership or my membership is terminated by HGEA/AFSCME in accordance with the HGEA/AFSCME Charter and Bylaws, and 3) that I am responsible for providing notification to HGEA/AFSCME of any change to an entry on this application form. I authorize my Employer to disclose any information contained in government records necessary for the administration of my membership account. I certify that the above statements and answers are true and complete to the best of my knowledge and belief.

Signature:

Patricia A. Grossman

Date:

6/23/95

Explanation for Item Number 2: Member Type is determined by the type of employment position you hold.

Member Type	Description	* Qualifications	For Information Only •Dues Assessed Per Month
A	Active	Included in one of these bargaining units: 02, 03, 04, 06, 08, 09 and 13.	(Service fee is based on salary and is a mandatory payroll deduction. Therefore, there is no additional fee for membership application.)
X	Non-Bargaining	Included in one of these bargaining units: 01, 05, 07, 10, 11 and 12.	\$6.40
E	Excluded		\$12.00 Effective 7/1/95: \$12.00/\$15.00
O	Appointed/Elected Official		\$12.00 Effective 7/1/95: \$15.00
F	Federal	Civilian personnel only.	\$6.40
P	Private Company	White collar	\$6.40
Z	Non-Profit Organization		\$6.40
H	HGEA Staff		Various
R	Retirees	Must have been retired from bargaining unit 02, 03, 04, 06, 08, 09, 13, or member type E or O.	\$3.00 up to age 75 \$2.00 from age 75
S	Spouse Member	Not employed and your spouse must be a member of HGEA in good standing.	\$3.00
W	Surviving Spouse	Not employed, must apply within 60 days of member's expiration date, and deceased member must have been in good standing.	\$3.00
Y	Other	Employed in the government sector, but you are not in the above categories.	\$6.40

* Subject to change as authorized by HGEA's Board of Directors or HGEA's General Assembly without written notification.

Explanation for Item Number 3: Government Bargaining Unit

Bargaining Unit No.	Description
01	Blue Collar
02	Blue Collar Supervisor
03	White Collar
04	White Collar Supervisor
05	Classroom Teacher
06	Educational Officer
07	Univ. of Hawaii Faculty

Bargaining Unit No.	Description
08	Univ. of Hawaii APT
09	RP Nurses
10	Hospital (Institution)
11	Firefighters
12	Police Officers
13	Professional and Scientific

51
UNIVERSITY OF HAWAII

HRIS PAYROLL NOTIFICATION FORM

11/23/94 15:27

SSN: [REDACTED] NAME: GROSSMAN, PATRICIA D DOC NO: 015971
P/R: F53 WD: L905 FORMER NAME: NO: OF BOR APPTS: 1
SEX: F MARITAL STATUS: M PAY CLASS: ASME FED EXEMPT: [REDACTED] STATE EXEMPT: [REDACTED]
RET/FICA: 1 A VISA: ISL: 1 TENURE: APTE5 N/A UH APPT DATE: 04 02 84
APPOINTMENT PERIOD FROM: 07 01 94 APPOINTMENT PERIOD TO: 06 30 95

P/A	DESCRIPTION	EFF DATE	PARTIAL	POS NO
405B	ANNUAL SALARY ADJUSTMENT	01 01 95		081638

CONTACT: COMMUNITY COLLEGES /HAWAII CC /PS-NON-CREDIT /

FROM: POSITION TITLE	F/T MON	TO: POSITION TITLE	F/T MON
POS NO RANK/STEP	PERCENT BU	POS NO RANK/STEP	PERCENT BU
UH EDUCATIONAL SP II	2,858.00	UH EDUCATIONAL SP II	2,915.00
081638 P06 G	1.0000 08	081638 P06 G	1.0000 08

ANNUAL: 34,296.00
SEMI-MO: 1,429.00

ANNUAL: 34,980.00
SEMI-MO: 1,457.50
BU: 08
FTE: 1.0000

PAY TYPE	ACCOUNT CODE	PERCENT	SEMI-MO AMT	NTE DATE	POS NO.
BASER	[REDACTED]	1.00000	1,457.50		081638

REMARKS:

THE ABOVE APPOINTMENT IS CONTINGENT ON THE AVAILABILITY OF FUNDS, AND VISA PROVISIONS WHEN APPLICABLE. IT IS CERTIFIED THAT THE APPOINTMENT IS IN COMPLIANCE WITH BOARD OF REGENTS POLICIES AND APPLICABLE STATUTES AND REGULATIONS. IN THE EVENT THAT SERVICE DOES NOT CONTINUE THROUGHOUT THE TERM, IF ANY BE SPECIFIED, THE SALARY DUE WILL BE BASED UPON THE PERIOD OF ACTUAL SERVICE.

APPROVING OFFICER SIGNATURE

DATE

APPROVING OFFICER SIGNATURE

DATE

FISCAL OFFICER SIGNATURE

DATE

I CERTIFY THAT, TO THE BEST OF MY KNOWLEDGE, THE APPOINTMENT OR PERSONNEL TRANSACTION(S) SHOWN ABOVE IS/ARE IN COMPLIANCE WITH BOARD OF REGENTS POLICIES AND ALL APPLICABLE STATUTES AND REGULATIONS.

APPOINTING OFFICER SIGNATURE

DATE

941123021008

EXHIBIT 2



Fwd: UH message regarding statutory deductions

1 message

Patricia Grossman <pgrossma@hawaii.edu>

Mon, Jul 9, 2018 at 2:29 PM

To: Lorena Kauhi <LKauhi@hgea.org>, Earl Hatada <ehatada@hgea.org>

It is nice to be in contact with you again Lorena
This time about Janus, note the recent reply from DAGS below

What determines "membership" in HGEA Union 8?
If memory serves, no membership application was completed in 1984 when I joined UH

The 5 July 2018 pay stub shows a deduction for SD, please explain

Many thanks!

Pat.

----- Forwarded message -----

From: **Fisher, Lenora D** <lenora.d.fisher@hawaii.gov>

Date: Mon, Jul 9, 2018 at 8:00 AM

Subject: RE: UH message regarding statutory deductions

To: Patricia Grossman <pgrossma@hawaii.edu>

Cc: Karyn Yoshioka <karynn@hawaii.edu>

Patricia,

DAGS does not define member/non-member as this is determined by the unions. The list is provided by the appropriate union and the deduction was stopped on 7/5/2018 for all paygroups, whether LAG or ATF status.

Thanks,

Lenora

From: Patricia Grossman <pgrossma@hawaii.edu>

Sent: Sunday, July 8, 2018 12:05 PM

To: Fisher, Lenora D <lenora.d.fisher@hawaii.gov>; Karyn Yoshioka <karynn@hawaii.edu>

Subject: Fwd: UH message regarding statutory deductions

Lenora,

How does DAGS operational define non-member for payroll purposes?

For those who are payroll lagged, does the effective date become 20 July?

Pat.

----- Forwarded message -----

From: **University of Hawaii** <announce@hawaii.edu>

Date: Fri, Jul 6, 2018 at 4:12 PM

Subject: UH message regarding statutory deductions

To: announce@hawaii.edu

This message is for all employees other than faculty, and is in response to the United States Supreme Court's Janus v. AFSCME ruling on the deduction of union dues for current and future employees.

The State Department of Accounting and General Services (DAGS) Central Payroll Office has stopped deductions of union dues for non-members as directed by the unions beginning with the July 5, 2018 payroll. DAGS will continue to process, as directed by the unions, non member requests. Employees should contact their respective union representative with any questions.

--

This message was sent on behalf of University of Hawaii.

Please do not reply to this message.

It was sent from an address that cannot accept incoming email.

Announcement ID number: 1530929547-32593

Announcement distribution:

- Staff at all campuses

--

Pat Grossman

Admissions Officer and

International Admissions DSO

Transfer Credit Evaluation and Articulation

University of Hawaii at Hilo

200 West Kawili Street

Hilo, Hawaii 96720-4091

USA

Tel (1-808) 932-7446

Tel 1-800-897-4456

Fax (1-808) 932-7459

--

Pat Gross
Admissions Officer and
International Admissions DSO
Transfer Credit Evaluation and Articulation
University of Hawaii at Hilo
200 West Kawili Street
Hilo, Hawaii 96720-4091
USA
Tel (1-808) 932-7446
Tel 1-800-897-4456
Fax (1-808) 932-7459



RE: [270-22D674EC-0014] FW: UH message regarding statutory deductions

1 message

Kauhi, Lorena <lkauhi@hgea.org>
To: Patricia Grossman <pgrossma@hawaii.edu>

Tue, Jul 10, 2018 at 11:27 PM

Hi Pat~

Thank you for your e-mail. I'll be out of the office tomorrow, but will plan to give you a call when I'm back in on Thursday to address your questions and determine next steps.

Just some things to note in the meantime - although DAGS sent the notice below in response to the Janus ruling, recent legislation (HB 1725) was passed this last session and enacted into law(Act 007) designating a "window" where active members can elect to discontinue dues deductions. Since your records show that you did activate your membership in 1995, you'd be subject to this window. If, after our discussion, you'd still like to move forward with suspending your dues, your "window" for discontinuing dues would fall next year between 5/23/19 – 6/23/19 (appears you signed up around 5/23/95).

Sorry if there may have been any confusion or misunderstanding on my part. I could only locate meeting notes from 2015 when you were having issues with some coworkers. I'm sorry to say that I don't specifically recall the discussion about your dues/membership when we met, but I can explain the difference between the statutory dues and active membership, and we'll go from there. Thanks again for reaching out...

Lorena D. Kauhi

Union Agent

Hawaii Government Employees Association / AFSCME Local 152
495 Manono Street, Hilo, HI 96720-4422

Main 808.935.6841 | Direct 808.961.0761 | Fax 808.961.2437

lkauhi@hgea.org | www.hgea.org | Facebook | Twitter

From: Patricia Grossman [mailto:pgrossma@hawaii.edu]

Sent: Tuesday, July 10, 2018 10:23 AM

To: Shinagawa, Ginalyn

Cc: Kauhi, Lorena

Subject: Re: [270-22D674EC-0014] FW: UH message regarding statutory deductions

Thank you for the information Ginalyn

By way of this email

As you may already know Lorena, the Hawaii Island Office assisted with my initial request to have no part of my dues used for political purposes. This was re-affirmed years later in an office visit conversation with you at that time, and was told my records were so noted. Given this, my status is non-member.

In recent days, Hawaii Public Radio reported, "State Comptroller Roderick Becker said it is the State's intent to suspend non-member deductions as soon as possible."

Please email Ginalyn to confirm my status, fwd a cc of the to this email address, and, have it reported to DAGS within the next ten business days

Many thanks for your assistance, Lorena

It is appreciated

Pat.

Pat.

On Tue, Jul 10, 2018 at 8:54 AM, Shinagawa, Ginalyn <gshinagawa@hgea.org> wrote:

Hello Patricia!

Thank you for your email. The document used to verify your membership date is the membership application you submitted back in 1995.

There were no request received in regards to your dues being used for political purposes.

Please let us know if you need more information.

Thank you,

Gina Shinagawa

Membership Services Technician

Hawaii Government Employees Association / AFSCME Local 152
888 Mililani Street, Suite 401, Honolulu, HI 96813-2991
Main 808.543.0000 | Direct 808.543.0039 | Fax 808.523.6879
gshinagawa@hgea.org | www.hgea.org | Facebook | Twitter

From: HGEA Member Service Center
Sent: Tuesday, July 10, 2018 8:14 AM
To: pgrossma@hawaii.edu
Cc: _Membership
Subject: Re: [270-22D674EC-0014] FW: UH message regarding statutory deductions

Aloha Patricia,

Our fiscal department will be able to assist you on your inquiry. I have CC'd them on this email.

Mahalo,

Claire Ancheta
Member Service Center
Hawaii Government Employees Association / AFSCME Local 152
888 Mililani Street, Suite 401, Honolulu, HI 96813-2991
Main/Service 808.543.0000 | service@hgea.org | Fax 808.528.4059

From: Patricia Grossman <pgrossma@hawaii.edu>
Sent: Mon, 09 Jul 2018 16:58:59 -1000
To: HGEA Member Service Center <service@hgea.org>
Subject: Re: [270-22D674EC-0014] FW: UH message regarding statutory deductions

Thanks for the information, Claire

What document was used to verify membership on that date, and
What date did I request that no part of my dues could be used for political
purposes?

Thanks
Pat.

On Mon, Jul 9, 2018 at 3:04 PM, HGEA Member Service Center <service@hgea.org> wrote:

> Aloha Patricia,
>
> Thank you for contacting HGEA. Our records show that you have been an HGEA
> member since 1995. Please let me know if you need any further assistance.
>
> Mahalo,
>
> *Claire Ancheta*
> *Member Service Center*
> Hawaii Government Employees Association / AFSCME Local 152

> 888 Mililani Street, Suite 409, Honolulu, HI 96813
> <<https://maps.google.com/?q=888+Mililani+Street,+Suite+409,+Honolulu,+HI+96813&entry=gmail&source=g>>
> -2991

> Main/Service 808.543.0000 | service@hgea.org | Fax 808.528.4059

>
> -----

>
>
>
> -----

> From: Patricia Grossman [pgrossma@hawaii.edu]

> Sent: Saturday, July 07, 2018 12:53 PM

> To: HGEA, Hawaii Island Division

> Subject: Fwd: UH message regarding statutory deductions

>
> Just need to verify that I am a non-member of HGEA UH Unit 08

>
> Thanks!

>
> Pat.

>
> ----- Forwarded message -----

> From: University of Hawaii <announce@hawaii.edu> - [mailto:](mailto:announce@hawaii.edu)

> announce@hawaii.edu >

> Date: Fri, Jul 6, 2018 at 4:12 PM

> Subject: UH message regarding statutory deductions

> To: announce@hawaii.edu

>
> This message is for all employees other than faculty, and is in response
> to the United States
> Supreme Court's Janus v. AFSCME ruling on the deduction of union dues for
> current and future
> employees.

>
> The State Department of Accounting and General Services (DAGS) Central
> Payroll Office has stopped
> deductions of union dues for non-members as directed by the unions
> beginning with the July 5, 2018
> payroll. DAGS will continue to process, as directed by the unions, non
> member requests. Employees
> should contact their respective union representative with any questions.

>
> --

>
> This message was sent on behalf of University of Hawaii.
> Please do not reply to this message.
> It was sent from an address that cannot accept incoming email.

>
> Announcement ID number: 1530929547-32593

> Announcement distribution:

> - Staff at all campuses

>
> --

> Pat Grossman
> Admissions Officer and
> International Admissions DSO
> Transfer Credit Evaluation and Articulation
> University of Hawaii at Hilo
> 200 West Kawili Street
> <<https://maps.google.com/?q=200+West+Kawili+Street+%0D%0AHilo,+Hawaii+96720&entry=gmail&source=g>>
> Hilo, Hawaii 96720-4091

--

Pat Grossman
Admissions Officer and
International Admissions DSO
Transfer Credit Evaluation and Articulation
University of Hawaii at Hilo
200 West Kawili Street
Hilo, Hawaii 96720-4091
USA
Tel (1-808) 932-7446
Tel 1-800-897-4456
Fax (1-808) 932-7459

From: Service
Sent: Mon, 09 Jul 2018 15:04:15 -1000
To: pgrossma@hawaii.edu
Subject: [270-22D674EC-0014] FW: UH message regarding statutory deductions

Aloha Patricia,

Thank you for contacting HGEA. Our records show that you have been an HGEA member since 1995. Please let me know if you need any further assistance.

Mahalo,

Claire Ancheta
Member Service Center
Hawaii Government Employees Association / AFSCME Local 152
888 Mililani Street, Suite 401, Honolulu, HI 96813-2991
Main/Service 808.543.0000 | service@hgea.org | Fax 808.528.4059

--

Pat Grossman
Admissions Officer and
International Admissions DSO

Transfer Credit Evaluation and Articulation

EXHIBIT 3

13 July 2018

Hawaii Government Employees Association (HGEA)
HGEA - AFSCME Local 152
495 Manono Street
Hilo, HI, 96720-4422

University of Hawaii, Office of the President
Bachman Hall 202
2444 Dole Street
Honolulu, HI 96822

Dear Union and Employer:

I, Patricia D Grossman, notify the Hawaii Government Employees Association (HGEA), herein UNION, and my employer, the University of Hawaii, herein EMPLOYER, of the following:

In case you consider me a member of UNION, I hereby resign from UNION and all of its affiliates, effective immediately. You do not have my affirmative consent to take any money in union dues or fees from my paycheck.

If you believe I have given consent in the past, that consent is revoked, effective immediately. I hereby revoke any prior dues/fees checkoff authorization I may have signed. This notification is permanent and continuing in nature, unless and until I tell you otherwise.

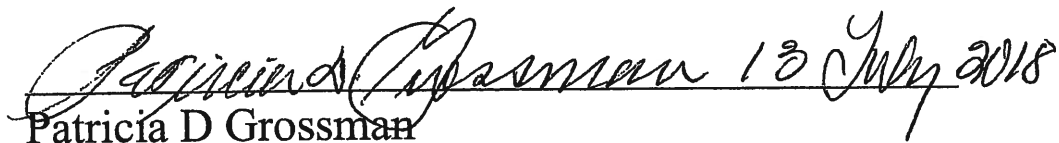
Page 2

13 July 2018

Under Janus v. AFSCME, I insist that you immediately cease deducting any and all union dues or fees from my paycheck. If you refuse to accept this letter as revoking any prior checkoff authorization, please promptly inform me, in writing, of exactly what steps I must take to effectuate that revocation and stop the deduction of dues/fees from my paycheck for UNION.

Please reply promptly to my request. The further exaction of full union dues or fees from me in a manner inconsistent with this letter will violate my rights under the United States Constitution.

Sincerely yours,

 13 July 2018
Patricia D Grossman

University of Hawaii at Hilo, Admissions Office
ID#10276157 P#0081113

xc:

University of Hawaii at Hilo, Office of the Chancellor
DAGS, Office of the Comptroller

96720-0704

CERTIFIED MAIL



7018 0680 0001 6730 5398



1000



96720

U.S. POSTAGE
PAID
HILO, HI
96720
JUL 14, 18
AMOUNT
\$6.70
R2304M115662-14

first class

Hawaii Government Employees Association (HGEA)
HGEA - AFSCME Local 152
495 Manono Street
Hilo, HI, 96720-4422

56720684422 0025

RETURN RECEIPT
REQUESTED

EXHIBIT 4

KOSHIBA PRICE & GRUEBNER

Attorneys At Law, A Law Corporation

January 10, 2019

707 Richards St., Suite 610
Honolulu, HI 96813
Telephone (808) 523-3900
Facsimile (808) 526-9829
Website: www.koshibalaw.com

Robert H. Thomas, Esq.
Damon Key Leong Kupchak Hastert
1003 Bishop Street, Suite 1600
Honolulu, Hawaii 96813

HAND DELIVERY

Dear Mr. Thomas:

Enclosed please find a check made payable to Patricia Grossman in the amount of four hundred two and 60/100 dollars (\$402.60) which represents a refund of HGEA dues from July 10, 2018 to date. (Please note that the total amount refunded may be slightly inaccurate because HGEA did not want to delay the refund until it could be verified by the State of Hawaii.)

Please acknowledge receipt of this refund. Thank you for your assistance.

Very truly yours,



James E.T. Koshiba
for

KOSHIBA PRICE & GRUEBNER

JETK:se
Enclosure

rc: Brian Kelsey, Esq.
Russell A. Suzuki, Esq.
Randy Perreira

rc: Brian Kelsey, Esq.
Jeffrey M. Schwab, Esq.
Liberty Justice Center
190 South LaSalle Street, Suite 1500
Chicago, Illinois 60603

Russell A. Suzuki, Esq.
Attorney General
State of Hawaii
425 Queen Street
Honolulu, Hawaii 96813

Randy Perreira
Executive Director
HGEA
888 Mililani Street, Suite 401
Honolulu, Hawaii 96813

Debra Kagawa, Esq.
HGEA
888 Mililani Street, Suite 401
Honolulu, HI 96813

HGEA Escrow Account

2044

Payee GROSSMAN, PATRICIA D
Vendor ID GROPAT

Account #:

1/10/2019

Invoice	Description	Discount	Amount
7/15-12/31/18	7/15/18-12/31/18 REF SD	\$0.00	\$402.60
Total :		\$0.00	\$402.60

HGEA Escrow Account
888 Mililani St., Ste 401
Honolulu, HI 96813FIRST HAWAIIAN BANK
59-101/1213

2044

DATE
1/10/2019AMOUNT
\$402.60

****Four Hundred Two and 60/100 Dollars

TO THE ORDER OF
GROSSMAN, PATRICIA D
[REDACTED]

VOID AFTER 90 DAYS

[Signature]

AUTHORIZED SIGNATURE

MP

|| [REDACTED] || || [REDACTED] || □ [REDACTED] ||

EXHIBIT 5

hawaiiattorney.com[®]

DAMON KEY LEONG KUPCHAK HASTERT
A LAW CORPORATION

1003 Bishop Street, Suite 1600
Honolulu, Hawaii 96813-6452
Telephone (808) 531-8031
Facsimile (808) 533-2242
E-Mail: rht@hawaiiattorney.com
Website: www.hawaiiattorney.com

January 23, 2019

VIA EMAIL jkoshiba@koshibalaw.com

James E. T. Koshiba, Esq.
Koshiba Price & Gruebner
707 Richards Street, Suite 610
Honolulu, Hawaii 96813

Re: *Grossman v. HGEA*, Civ. No. 1:18-cv-00493-DKW-KSC

Dear Mr. Koshiba:

I write in response to your letter dated January 10, 2019. You wrote, "Enclosed please find a check made payable to Patricia Grossman in the amount of four hundred two and 60/100 dollars (\$402.60) which represents a refund of HGEA dues from July 10, 2018 to date."

In her Complaint, Plaintiff asked the Court to "declare that limiting the ability of Mrs. Grossman to resign her union membership to a window of time is unconstitutional because she did not provide affirmative consent." Because your client sent a refund of union dues collected from Mrs. Grossman from the last time she expressed her wish to withdraw from the union until now, Mrs. Grossman is treating such action as an admission from Hawaii Government Employees Association that taking union dues from her after she requested to withdraw from the union was unlawful.

If this is an incorrect conclusion to draw, please let us know immediately, and Mrs. Grossman will promptly return the check to you.

Very truly yours,

DAMON KEY LEONG KUPCHAK HASTERT



Robert H. Thomas

cc: Derek T. Mayeshiro, Esq. derekmay@hawaii.edu
Richard H. Thomason, Esq. richard.h.thomason@hawaii.gov
Brian Kelsey, Esq. bkelsey@libertyjusticecenter.org
Jeffrey M. Schwab, Esq. jschwab@libertyjusticecenter.org

Matthew T. Evans
Tred R. Eyerly
Kayla M. Fajota
Diane D. Hastert
Megumi Honami
Brooke H. Hunter
Andrew I. Kim
Christine A. Kubota
Gregory W. Kugle
Kenneth R. Kupchak
Christopher J.I. Leong
Denis C.H. Leong
Megan L.M. Lim¹
David P. McCauley
Travis T. Moon
Mark M. Murakami
Veronica A. Nordyke
Anna H. Oshiro
Laurel E. Pepe
Loren A. Seehase
Douglas C. Smith
Robert H. Thomas²
Ross Uehara-Tilton
Kelly Y. Uwaine
Michael A. Yoshida
Madeleine M.V. Young³
Joanna C. Zeigler

Of Counsel
R. Charles Bocken
Jed Kurzban³
Na Lan
Judith A. Schevtchuk

C. F. Damon, Jr. (1926-2017)
Charles W. Key (1929-2008)

¹Admitted in Hawaii and Washington

²Admitted in Hawaii and California

³Admitted in Hawaii and Florida



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EXHIBIT 6

KOSHIBA PRICE & GRUEBNER

Attorneys At Law, A Law Corporation

January 28, 2019

707 Richards St., Suite 610
Honolulu, HI 96813
Telephone (808) 523-3900
Facsimile (808) 526-9829
Website: www.koshibalaw.com

VIA HAND DELIVERY

Robert H. Thomas, Esq.
Damon Key Leong Kupchak Hastert
1003 Bishop Street, Suite 1600
Honolulu, Hawaii 98613

VIA FIRST CLASS MAIL

Brian Kelsey, Esq.
Jeffrey M. Schwab, Esq.
Liberty Justice Center
190 South LaSalle Street, Suite 1500
Chicago, Illinois 60603

Re: Grossman v. Hawaii Government Employees Association/AFSCME Local 152; et
al.; U.S.D.C., District of Hawaii, 1:18-cv-00493-DKW-KSC

Dear Gentlemen:

I write in response to Mr. Thomas' January 23, 2019 letter. HGEA reviewed Patricia Grossman's file and determined that HGEA made an administrative error by failing to process her request to stop dues deductions. In August 2018, HGEA cancelled further deductions and sent refunds to other members who were in the same position as Ms. Grossman. Due to an administrative error, Ms. Grossman was not included in that group. Upon discovering that Ms. Grossman's request had never been processed due to an administrative error, HGEA notified Ms. Grossman's employer to stop further deductions and sent Ms. Grossman an unconditional refund of the dues received from her beginning on July 1, 2018, the start of the payroll period during which she requested to stop her dues deductions.

Very truly yours,



James E.T. Koshiba
for
KOSHIBA PRICE & GRUEBNER

JETK:se

EXHIBIT 7

KOSHIBA PRICE & GRUEBNER

Attorneys At Law, A Law Corporation

June 28, 2019

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VIA HAND DELIVERY

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Re: *Grossman v. HGEA et al.*, Case No. 18-00493 DKW-RT (D. Haw.)

Dear Counsel:

On June 21, 2019, you informed us that Patricia Grossman never deposited the check that HGEA provided to her (through counsel) on January 10, 2019 to refund dues deducted from her pay for the period July 1, 2018 forward. You said Ms. Grossman is willing to void the original check and deposit a reissued check. Based on that representation, HGEA has cancelled the January 10, 2019 check and reissued the attached check to Ms. Grossman.

Very truly yours,



James E.T. Koshiba
Jonathan E. Spiker
for

KOSHIBA PRICE & GRUEBNER

JETK:JES

Enclosure

cc: HGEA

Scott Kronland and Matthew Murray

HGEA Escrow Account

2256

Payee GROSSMAN, PATRICIA D
 Vendor ID GROPAT

Account #:

6/26/2019

Invoice	Description	Discount	Amount
7/15-12/31/18PG	7/15/18-12/31/18 REF SD	\$0.00	\$442.86
Total :		\$0.00	\$442.86



HGEA Escrow Account
 888 Mililani St., Ste 401
 Honolulu, HI 96813

FIRST HAWAIIAN BANK
 59-101/1213



2256

DATE
 6/26/2019

AMOUNT
 \$442.86

 PAY Four Hundred Forty Two and 86/100 Dollars

TO THE
 ORDER
 OF

GROSSMAN, PATRICIA D

VOID AFTER 60 DAYS

 AUTHORIZED SIGNATURE

MP

