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OUR REFERENCE NO.
056930-2



February 12, 2025

Via Regular Mail and E-mail: dbedt.luc.web@hawaii.gov

Daniel E. Orodenker
Executive Officer
Land Use Commission
Department of Business, Economic Development & Tourism
P. O. Box 2359
Honolulu, Hawai'i 96804

Re: Delinquent Annual Reports
State Land Use Commission Docket No. A93-701
Original Petitioner: Kaupulehu Developments
Successor Petitioners: KD Acquisition, LLLP (fka WB KD Acquisition, LLC),
as to Increment 1 of Lot 4-A, KD Acquisition II, LP (fka KD Acquisition II,
LLLP), as to Increment 2 of Lot 4-A, and Hualalai Investors, LLC as to Lot 4-B

Dear Mr. Orodenker:

This will serve as a response to your letter dated December 23, 2024, addressed to Mr. Steven S.C. Lim of Carlsmith Ball LLP, which informed that the annual progress reports required for submittal to the State Land Use Commission ("**Commission**") pursuant to Condition 27 of the Findings of Fact, Conclusions of Law, and Decision and Order under Docket No. A93-701 ("**Docket No. A93-701**") were delinquent.

On behalf of our current clients, KD Acquisition, LLLP and KD Acquisition II, LP (collectively hereinafter referred to as "**KD**"), and Hualalai Investors, LLC ("**HILLC**"), the successors in interest to Kaupulehu Developments, the original Petitioner in Docket No. A93-701, **we are hereby requesting a thirty (30) day extension to submit comprehensive updated Annual Progress Reports** for the Commission's consideration.

As discussed in prior annual reports to the Commission, the area reclassified by Docket No. A93-701 was divided into two (2) distinct development areas, now identified as the "Lot 4-A" development area and the "Lot 4-B" development area.

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The Lot 4-A development area is controlled by KD, while the Lot 4-B development area is controlled by HILLC. As indicated in prior Annual Progress Reports to the Commission, KD and HILLC will file separate annual progress reports.

The failures to submit these required annual progress reports were inadvertent, and KD and HILLC have been gathering information to ensure that comprehensive updates can be provided. Our firm was recently engaged to assist both KD and HILLC in this endeavor.

We look forward to updating the Commission within the next thirty (30) days with comprehensive annual reports.

If you have any questions regarding this request or if you require additional information, please feel free to contact me at any time. Thank you.

Sincerely,



Katherine A. Garson

KAG/jkk1

Enclosures

cc: KD Acquisition, LLLP
KD Acquisition II, LP
Hualalai Investors, LLC