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COUNTY CLERK

November 17, 2025

Via email only at [county.clerk@mauicounty.us](mailto:county.clerk@mauicounty.us)

Honorable Alice L. Lee, Chair  
And Members of the Council  
County of Maui  
Wailuku, Hawaii 96793

SUBJECT: Litigation Matter – Settlement Authorization  
THE ESTATE OF MATTHEW LOUIS PERREIRA, DECEASED, ET AL. VS.  
PATRICK GEORGE VENTURA; COUNTY OF MAUI; STATE OF HAWAII;  
ALEXANDER & BALDWIN, LLC; CIVIL 2CCV-22-0000045

Dear Chair Lee and Council Members:

Please find attached separately a Proposed Resolution entitled "THE ESTATE OF MATTHEW LOUIS PERREIRA, DECEASED, ET AL. VS. PATRICK GEORGE VENTURA; COUNTY OF MAUI; STATE OF HAWAII; ALEXANDER & BALDWIN, LLC; CIVIL 2CCV-22-0000045." The purpose of the proposed resolution is to discuss settlement options regarding the above-referenced lawsuit.

May I request that the proposed resolution be scheduled for discussion and action, or referral to the appropriate standing committee as soon as possible as this matter is set for trial on February 2, 2026. For further information on this matter, I have also attached the Third Amended Complaint and Summons, filed June 13, 2023.

An executive session may be necessary to discuss questions and issues pertaining to the powers, duties, privileges, immunities, and liabilities of the County, the Council, and/or the Committee.

If you have any questions or concerns, please do not hesitate to contact us. Thank you for your anticipated assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Glen R. Pascual", is written over a horizontal line.

Glen R. Pascual  
Deputy Corporation Counsel

cc: Jordan Molina, Director of Department of Public Works

Attachments

JAMES KRUEGER, ESQ. 492  
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Attorneys for Plaintiffs

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IN THE CIRCUIT COURT OF THE SECOND CIRCUIT

STATE OF HAWAII

THE ESTATE OF MATTHEW LOUIS	)	Civil No. 2CCV-22-0000045(4)
PERREIRA, Deceased, by CHLOE	)	(Motor Vehicle Tort)
PERREIRA and ROBERT PERREIRA,	)	
SPECIAL CO-ADMINISTRATORS OF	)	THIRD AMENDED COMPLAINT
THE ESTATE OF MATTHEW LOUIS	)	
PERREIRA, Deceased, CHLOE	)	
PERREIRA, Individually and As Next	)	
Friend of I.J.P., A Minor, RENEE	)	
PERREIRA, and ROBERT PERREIRA,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
PATRICK GEORGE VENTURA,	)	
COUNTY OF MAUI, STATE OF	)	
HAWAII, <u>ALEXANDER &amp; BALDWIN,</u>	)	
<u>LLC</u> , JOHN DOES 1-5, JOHN DOE	)	
CORPORATIONS 1-5, JOHN DOE	)	
PARTNERSHIPS 1-5, ROE NON-PROFIT	)	
CORPORATIONS 1-5 and ROE	)	
GOVERNMENTAL AGENCIES 1-5,	)	
	)	
Defendants.	)	



### THIRD AMENDED COMPLAINT

1. At all times relevant herein, CHLOE PERREIRA and ROBERT PERREIRA were citizens and residents of the County of Maui, State of Hawaii, and are the duly appointed co-administrators of THE ESTATE OF MATTHEW LOUIS PERREIRA, deceased.

2. At all times MATTHEW LOUIS PERREIRA, deceased, was a citizen and resident of the County of Maui, State of Hawaii.

3. At all times relevant herein, plaintiffs MATTHEW LOUIS PERREIRA, deceased, and CHLOE PERREIRA were husband and wife.

4. At all times relevant herein, ROBERT PERREIRA and RENEE PERREIRA, were husband and wife and parents of MATTHEW LOUIS PERREIRA, deceased, both of whom were citizens and residents of the County of Maui, State of Hawaii.

5. At all times relevant herein, I.J.P., a minor, was the natural child of CHLOE PERREIRA and MATTHEW LOUIS PERREIRA, deceased, and a citizen and resident of the County of Maui, State of Hawaii.

6. Plaintiff CHLOE PERREIRA, the natural mother of I.J.P., a minor, as the Next Friend of I.J.P., a minor, presents his claim as well as her individual claim asserted herein.

7. At all times relevant herein, defendant PATRICK GEORGE VENTURA was a citizen and resident of the County of Maui, State of Hawaii.

8. All times relevant herein, defendant COUNTY OF MAUI, was a corporate body politic, duly created by law, subject and amenable to the jurisdiction and process of this court.

9. All plaintiffs assert claims against defendant COUNTY OF MAUI, pursuant to H.R.S. §46-72, as plaintiff MATTHEW LOUIS PERREIRA, deceased, was killed in a collision on Dairy Road at or near Hukilike Street, public ways in the COUNTY OF MAUI, Kahului, Maui, Hawaii, as a result of county road conditions which constituted an unreasonable risk of harm, and were unreasonably dangerous, to motorists foreseeably using Dairy Road, at or near Hukilike Street.

10. At all times relevant herein, defendant STATE OF HAWAII was a governmental entity, a corporate body politic, created and existing under the laws in the State of Hawaii, subject and amenable to the jurisdiction and process of this Court.

11. All plaintiffs assert claims against defendant STATE OF HAWAII, ~~pursuant to H.R.S. §46-72~~, as plaintiff MATTHEW LOUIS PERREIRA, deceased, was killed in a collision on Dairy Road at or near Hukilike Street, public ways in the County of Maui, State of Hawaii, as a result of road conditions which constituted an unreasonable risk of harm, and were unreasonably dangerous, to motorists foreseeably using Dairy Road, at or near Hukilike Street.

12. At all times relevant herein, defendant ALEXANDER & BALDWIN, LLC, a foreign limited liability company, was a legal entity, duly created by law, which did business within the County of Maui, State of Hawaii, and which is subject and amenable to the jurisdiction and process of this court.

13. All plaintiffs assert claims against defendant ALEXANDER & BALDWIN, LLC, as plaintiff MATTHEW LOUIS PERREIRA, deceased, was killed in a collision on Dairy Road at or near Hukilike Street, public ways in the County of Maui, State of Hawaii, as a result of road conditions which constituted an unreasonable risk of harm, and were unreasonably dangerous, to motorists foreseeably using Dairy Road, at or near Hukilike Street.

14. Plaintiffs have diligently and in good faith attempted to ascertain names, identities, and possible defendants whose identities are presently unknown to plaintiffs. Such attempts include obtaining the applicable police report or other investigative reports and contacting presently known witnesses to the occurrence. Despite the foregoing, the identities of other defendants, whose conduct may have been a legal cause of plaintiffs' injuries and damages, remain unknown to plaintiffs.

15. Plaintiffs allege, on information and belief, that directly or indirectly, the conduct of other defendants, presently unknown to plaintiffs, was or may have been a legal cause of the occurrence complained of and/or the injury, damage, or loss thereby sustained by plaintiffs as a result of which, all defendants, unidentified and identified, may be legally, jointly and severally, liable to plaintiffs for the injuries and losses sustained, inasmuch as the conduct of each defendant may have coincided with and/or concurred with that of each and every other defendant, named or unnamed.

16. This Court has jurisdiction over the subject matter and the parties of these proceeding; venue in this Court is proper.

17. At all times relevant herein, Dairy Road was a public way in the COUNTY OF MAUI, STATE OF HAWAII.

18. At all times relevant herein, Hukilike Street was a public way in the COUNTY OF MAUI, STATE OF HAWAII.

19. At all times relevant herein, Dairy Road was owned, designed, constructed, planned, supervised, inspected, maintained, and operated by defendants, and/or any of them, including defendants COUNTY OF MAUI and/or STATE OF HAWAII and/or ALEXANDER & BALDWIN, LLC, and the area whereat the death of plaintiffs' decedent occurred.

20. At all relevant times herein, Dairy Road, together with the real property on which it was situate, was in a condition which constituted an unreasonable risk of harm, and was unreasonably dangerous, to motorists foreseeably using Dairy Road, including plaintiffs' decedent, MATTHEW LOUIS PERREIRA.

21. At all times relevant herein, Hukilike Street was owned, designed, constructed, planned, supervised, inspected, maintained, and operated by defendants, and/or any of them, including defendants COUNTY OF MAUI and/or STATE OF HAWAII and/or ALEXANDER & BALDWIN, LLC, and the area whereat the death of plaintiffs' decedent occurred.

22. At all relevant times herein, Hukilike Street, together with the real property on which it was situate, was in a condition which constituted an unreasonable risk of harm, and was unreasonably dangerous, to motorists foreseeably using Hukilike Road, including plaintiffs' decedent, MATTHEW LOUIS PERREIRA.

23. On or about December 13, 2020, MATTHEW LOUIS PERREIRA, now deceased, drove a motorcycle on Dairy Road at or near Hukilike Street, in the COUNTY OF MAUI, STATE OF HAWAII.

24. At the aforesaid time and place, a collision occurred between the motorcycle driven by MATTHEW LOUIS PERREIRA, now deceased, and a 2003 Chevrolet S10 pick up truck, negligently driven by named defendant, PATRICK GEORGE VENTURA, who failed to yield the right of way to plaintiffs' decedent.

25. On or about December 13, 2020, defendants COUNTY OF MAUI and/or STATE OF HAWAII and/or ALEXANDER & BALDWIN, LLC, and/or any of them, negligently operated, maintained, controlled, patrolled, managed, and/or invited, and/or allowed, to be used by the public, as well as plaintiffs' decedent, the aforesaid property, as a result of which conduct, the line of sight for motorists at said intersection

was obstructed, which obstruction was a legal cause of the motorcycle collision involving plaintiffs' decedent.

26. The conduct of defendants, and/or any of them, mentioned above, was negligent, inconsistent with applicable principles of road safety, and indicative of a callous disregard of the safety of motorists proceeding on Dairy Road and/or Hukilike Street, including plaintiffs' decedent, which conduct and/or road condition was/were a legal cause(s) of the collision mentioned above.

27. As a result of the aforesaid collision, MATTHEW LOUIS PERREIRA died on December 15, 2020.

28. As a legal result of the foregoing, THE ESTATE OF MATTHEW LOUIS PERREIRA, deceased, by CHLOE PERREIRA and ROBERT PERREIRA, SPECIAL CO-ADMINISTRATORS OF THE ESTATE OF MATTHEW LOUIS PERREIRA, deceased, makes claim for damages, including any mental or physical pain and suffering suffered by him before his death, medical and/or related expense required by him, funeral and burial expenses, loss of earning capacity and/or earnings and wages, past, present and/or future, loss of enjoyment of life and/or life's activities, loss of life expectancy, as well as any other damages as shall be proved at trial.

29. As a further legal result of the foregoing, all remaining plaintiffs have experienced, and will continue to do so, serious, severe, and permanent emotional and mental distress, together with, as applicable, loss of marital, parental, filial consortium and relationship, love, services, guidance, aloha, respect, protection, attention and companionship, with plaintiffs' decedent, MATTHEW LOUIS PERREIRA, which had been enjoyed by them, or any of them, prior to his death, and which would likely have continued to enjoy subsequent thereto, but for his untimely death, together with other damages as shall be proven at time of trial.

30. As a further legal result of the foregoing, plaintiff ROBERT PERREIRA suffered, and will continue to suffer, in addition to the above-mentioned, the negligent infliction of emotional distress for having witnessed the collision.

WHEREFORE, upon a hearing hereof, plaintiffs request that judgment be entered in their favor, jointly and severally, against defendants, and/or any of them, for such damages as to which each shall be entitled pursuant to proof adduced at trial, together with costs of suit, attorney fees, interest, pre- and post-judgment interest, and such other and further relief to which they shall be entitled pursuant to Rule 54(d), Hawaii Rules of Civil Procedure.

DATED this 13th day of June, 2023, in Wailuku, Maui, Hawaii.

/s/ Cynthia K. Wong  
JAMES KRUEGER, ESQ.  
CYNTHIA K. WONG, ESQ.  
Attorneys for Plaintiffs