

Copyright Protection for Fashion Designs in the Wake of **STAR**ATHLETICA

By Brett R. Tobin

In March 2017, the United States Supreme Court issued its decision in *Star Athletica, LLC v. Varsity Brands, Inc.*, 137 S. Ct. 1002 (2017), affirming that certain aspects of designs on cheerleading uniforms were eligible for copyright protection. In resolving a convoluted circuit split and by announcing a new test for copyright separability analysis, the ruling garnered significant immediate attention. As with any major Supreme Court decision, though, the on-the-ground effects will take some time to sort out. Similarly, the law of unintended consequences suggests that the impacts of a decision affecting such a complex area of the law are likely to pop up in unexpected ways.

This article attempts to put the *Star Athletica* decision into context by discussing the case and the copyright law it analyzed while also examining its impact so far and potential future consequences. In this regard, potential effects in the Hawaii market are of particular interest given the widespread use of design patterns for aloha attire and other clothing.

APPENDIX TO OPINION OF THE COURT



Separability and Useful Articles

Though perhaps one might not have anticipated that cheerleader uniform designs would generate a legal dispute of national significance, the history of Supreme Court jurisprudence has proven time and again that it works in mysterious ways.

Varsity Brands, Inc. (“Varsity”) designs, manufactures, and sells cheerleading and dance team uniforms and is one of the market leaders in that field. Varsity has over 200 copyright registrations for its uniform designs, consisting largely of various combinations of chevrons, stripes, and

lines. In 2010, Varsity sued rival Star Athletica, LLC (“Star Athletica”) for allegedly infringing on five of those designs (as shown on this page). The dispute centered on the copyright doctrine of separability.

By way of background, eligibility for federal copyright protection flows only to “original works of authorship fixed in any tangible medium of expression.” 17 U.S.C. § 102(a). These works can take the form of literary works, musical works, dramatic works, and “pictorial, graphic, and sculptural works,” among other things. *Id.* Pictorial, graphic, and sculptural works—or “PGS works”—are further defined to include “two-dimensional and three-dimensional works of fine, graphic, and applied art, photographs, prints and art reproductions, maps, globes, charts, diagrams, models, and technical drawings, including architectural plans.” 17 U.S.C. §101. The statute goes on to provide that “[s]uch works shall include works of artistic craftsmanship insofar as their form but not their mechanical or utilitarian aspects are concerned.” *Id.* Thus, the Copyright Act attempts to

draw a line between the aesthetic and functional aspects of a work, with copyright protection reserved for the artistic, not the utilitarian features.

That line exists as one example of the effort the law makes to distinguish and balance between patent and copyright law—pushing protection of functional items toward patent and artistic works toward copyright. As such, industrial designs and so-called “useful articles” are typically *not* eligible for copyright protection. Under Section 101 of the Copyright Act, a “useful article” is defined as “an article having an intrinsic utilitarian function that is not merely to portray the appearance of the article or to convey information.” 17 U.S.C. § 101. Articles of clothing have historically been classified as “useful articles” because they serve a primary function of covering and protecting the body from the elements beyond any aesthetic qualities they might also possess.

The design of a useful article can still be eligible for protection as a PGS work, but “only if, and only to the extent that, such design incorporates pictorial, graphic, or sculptural features that can be identified separately from, and are capable of existing independently of, the utilitarian aspects of the article.” *Id.* The inquiry into whether the design of a useful article has pictorial, graphic, or sculptural elements that can be separated from the utilitarian functions of the item is sometimes known as the “separability test.”

In proceedings before the District Court of the Western District of Tennessee, Star Athletica contended that Varsity’s designs failed the separability test because the designs could not be extricated from their useful function of identifying the outfits as cheerleading uniforms, and thus they were not eligible for copyright protection. *See Varsity Brands, Inc. v. Star Athletica, LLC*, 2014 U.S. Dist. LEXIS 26279, 2014 WL 819422 (W.D. Tenn. Mar. 1, 2014). The court agreed, granting summary judgment on the issue and invalidating Varsity’s copyrights. *Id.*

On appeal, the Sixth Circuit struggled to settle upon an appropriate test for separability, identifying *nine* distinct approaches that various courts had used or commentators had proposed. *See Varsity Brands, Inc. v. Star Athletica, LLC*, 799 F.3d 468, 484-85 (6th Cir. 2015). In some instances, courts had even applied multiple separate tests in the same case. *See id.* at 485-87. Ultimately, the Sixth Circuit fashioned its own hybrid approach, combining some elements from existing tests, thus essentially creating a tenth separability test. *Id.* at 487-88. Applying this hybrid test, the Sixth Circuit reversed the district court and ruled that Var-

sity’s chevron and stripe designs could be separated from the utilitarian functions of the uniforms, and thus the designs were eligible for protection as PGS works. *Id.* at 492.

The decision appeared to turn on what standard was applied and, in particular, on how the court applying it interpreted the functional purposes of the useful article in question. Rather than looking to Star Athletica’s alleged purpose for the uniform—identifying the wearer as a cheerleader—the Sixth Circuit instead focused on the uniform’s functions of covering the body, wicking away moisture, and withstanding the rigors of athletic movement. Given that the chevron and stripe designs did nothing to advance those purposes, the court found them to be separable. Following the ruling, Star Athletica sought Supreme Court review.

The Supreme Court “granted certiorari to resolve widespread disagreement over the proper test for implementing § 101’s separate identification and independent existence requirements.” 137 S. Ct. at 1007. Thus, it appears that a desire to clarify some muddy waters by trimming the number of separability tests down from ten to one was perhaps a bigger motivating factor for the Court in taking the case than what was actually at stake between the parties. Nevertheless, it provided the vehicle for a broadly applicable ruling that will likely have an important impact well beyond the arena of sideline sartorial stylings.

The Court defined its task as determining “whether the arrangements of lines, chevrons, and colorful shapes appearing on the surface of respondents’ cheerleading uniforms are eligible for copyright protection as separable features of the design of those cheerleading uniforms.” *Id.* at 1008-09. But the Court then began its discussion by first determining whether separability analysis applied at all. *Id.* at 1009.

To understand this point, one must consider first principles. Had someone drawn a series of chevrons and lines on a piece of paper, or a painter’s canvas, the result would have been a two-dimensional graphical design fitting within the definition of a PGS work. Whether it was sufficiently original to ultimately qualify for copyright protection is a separate question, but it would at least have satisfied the first element of eligibility.

Varsity contended that it had done just that—that its designs were created as two-dimensional graphic works that were then merely applied to a useful article; and thus, they should be eligible for copyright protection regardless of their use. The United States government, appearing as *amicus curiae*, also picked up on this thread (so to speak)

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and noted that Varsity's copyright registrations were based on two-dimensional drawings and photographs. Therefore, its rights were to those works which, assuming they met the criteria for originality, could then be reproduced on the surface of any useful article pursuant to Section 113 of the Copyright Act. Section 113 provides that ownership of a copyright to a PGS work grants the owner the right "to reproduce the work in or on any kind of article, whether useful or otherwise." 17 U.S.C. § 113.

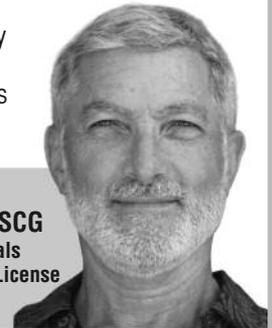
In her concurring opinion, Justice Ginsburg agreed, focusing on the fact that in all the registrations at issue, Varsity had indicated that the item being registered was a "2-dimensional artwork," not a 3-dimensional cheerleader uniform. 137 S. Ct. at 1019. In her view, then, the designs were "standalone pictorial and graphic works that respondents . . . reproduce on cheerleading uniforms." *Id.* As such, separability analysis was unnecessary, and the designs were eligible for copyright protection as long as they met all the other pertinent criteria.

This approach has intuitive appeal and is supported by well-established jurisprudence relating to the copyrightability of fabric pattern designs. *See, e.g., Folio Impressions, Inc. v. Byer California*, 937 F.2d 759 (2d Cir. 1991); *Knitwaves, Inc. v. Lollytogs Ltd.*, 71 F.3d 996 (2d Cir. 1995); *Hamil Am., Inc. v. GFI, Inc.*, 193 F.3d 92 (2d Cir. 1999). The majority, however, drew a distinction based on the language of Section 101, which requires separability analysis for PGS works "incorporated into the 'design of a useful article.'" 137 S. Ct. at 1009. The Court deemed that the stripe and chevron elements had been woven into the design of the uniform as a whole and thus needed to survive a separability test to be eligible for copyright protection. *Id.*

The Court then set about to determine the proper test to be applied. Given



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that the majority opinion was written by Justice Thomas, it is not surprising that the primary focus of that test was the text of the Copyright Act itself. Recall that Section 101 provides that design elements of useful articles can be considered PGS works eligible for copyright protection as long as those elements “can be identified separately from, and are capable of existing independently of, the utilitarian aspects of the article.” 17 U.S.C. § 101. Thus, the elements identified by the Copyright Act are (1) separate identification and (2) independent existence. The test the Court ultimately arrived at does not stray far from those two elements:

an artistic feature of the design of a useful article is eligible for copyright protection if the feature (1) can be perceived as a two- or three-dimensional work of art separate from the useful article and (2) would qualify as a protectable pictorial, graphic, or sculptural work either on its own or in some other medium if imagined separately from the useful article.

137 S. Ct. at 1016. The first part of the test addresses the “identified separately from” portion of Section 101, while the second part clarifies the “existing independently of” portion.

In arriving at this articulation of separability, the Court determined that Section 101 and Section 113 of the Copyright Act are two sides of the same coin. As discussed above, Section 113 grants a copyright holder the exclusive right to reproduce that same work on any type of article “whether useful or otherwise.” 17 U.S.C. § 113. In other words, if an artist creates a copyrightable work, he can then affix that work to any useful article and still be entitled to copyright protection. The Court found it would have been incongruous if Section 101 meant that the artist could not seek copyright protection for the same work just because

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it was first fixed in tangible form as part of a useful article. 137 S. Ct. at 1010-11. This is why the second part of the test set forth in *Star Athletica* requires that the separated element would qualify as PGS work on its own had it been fixed in some other medium. In the Court's view, whether the design is a PGS work, not the medium in which it was first created, is the dispositive issue.

Additionally, unlike some prior separability tests, the focus now is entirely on the removed elements and not on what remains following separation. Even if the remaining useful article would be less useful than it was with the PGS elements, it does nothing to alter the analysis. *Id.* at 1013-14. As long as the design elements are PGS works standing on their own, the inquiry ends.

Importantly, though, the Court noted that its ruling merely established that the stripes and chevrons were separable from the uniforms and therefore *eligible* for copyright protection. *Id.* at 1012. The Court did not reach the separate question of whether the graphical designs were sufficiently original to qualify for actual copyright protection. *Id.* at n.1.

Likewise, Ginsburg's concurrence specifically did not address whether the designs met the requirements for copyrightable subject matter even though she was analyzing the issues with the starting point of the registrations themselves. *Id.* at 1019 n.2. Conversely, the dissent written by Justice Breyer appeared to be driven in large part by his view that "considered on their own, the simple stripes are plainly unoriginal." *Id.* at 1036. Though the issue of originality was remanded back to the district court, the parties settled before it was determined so no answer will be forthcoming.

Also noteworthy was the Court's statement that the only portion of the uniforms eligible for copyright protection was "the two-dimensional work of art fixed in the tangible medium of the uniform fabric." *Id.* at 1013. This

reiterated the long-standing rule that fashion designs themselves—*e.g.*, the shape, cut, and dimensions of the uniforms—are *not* eligible for such protection. *Id.*

What Now?

Now that the Supreme Court has definitively established the test for separability, what does that mean? At first blush, the test appears to be relatively straightforward: do artistic design elements exist and can they be imagined separately from the useful article to which they are attached? As with any legal test, though, the devil will be in the details of its application. The Court attempted to fashion a broad rule that could be applied in a variety of contexts, but commentators have registered concern over whether lower courts have been given sufficient guidance to accomplish that goal.

While still too early to tell for sure, at least one recent case has shown that there may be just cause for concern. In *Silvertop Associates v. Kangaroo Manufacturing*, a

dispute arose between two competing creators of banana costumes—the next logical battleground after a dispute over cheerleading uniforms. 2018 U.S. Dist. LEXIS 89532, 2018 WL 2427120 (D.N.J. May 30, 2018). Silvertop sought a preliminary injunction alleging infringement of its registered copyright for its banana costume due to Kangaroo's sale of a purportedly similar costume. In its discussion of the "reasonable probability of success on the merits" prong of the preliminary injunction analysis, the court made some puzzling decisions.

The court began by properly identifying the banana costume as a useful article. *Id.* at *9. Though reasonable minds might disagree over the usefulness of dressing up as a banana, there is little question that a banana costume would functionally serve that purpose. The court then sought to apply the *Star Athletica* test while noting that it was the first court in the Third Circuit to do so. *Id.* at n.4. Silvertop contended that the following features of the costume were separable: "the overall shape and cutout holes of the costume, the black ends of the banana, and the vertical



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lines running down the middle of the banana.” *Id.* at *11.

With respect to the cutout holes, the court properly determined that these were no different than sleeves on a shirt or legs on pants, which merely served the utilitarian purpose of allowing the costume to be worn. *Id.* at *12-13. But then things got confusing. The court stated that the remaining features must be viewed *as a whole*, citing the general standard for copyright protection of an artistic work. *Id.* at *13-14 (citing *Kay Berry, Inc. v. Taylor Gifts, Inc.*, 421 F.3d 199, 207 (3d Cir. 2005)). However, this is *not* the standard for analyzing a useful article, as has been discussed at length. Indeed, the very name of the test that the court was ostensibly applying is the *separability* test. One simply cannot simultaneously separate portions of a design and view the design as a whole.

The court stated that Silvertop could likely “prove that the banana design can both be identified separately from and can exist independently from the utilitarian aspects of the article.” *Id.* at *14. The court then listed the features it deemed to be separately identifiable, including the length and shape of the costume, the location of the head and arm cutouts, the textural look of the fabric, the yellow color, and the parallel lines mimicking the ridges on a banana. *Id.* at *14-15. But these would seem to be many of the very same features—the shape, cut, and dimensions of the article—that the Supreme Court expressly forbid from being considered as separable in *Star Athletica*. 137 S. Ct. at 1013. They also are not even the same features Silvertop itself identified.

Even more curiously, the court then took those features and separated them *en*

masse. “The Court thus finds, although it uses elements that might in and of themselves not be protectable standing alone, that *the design when considered as a whole is separable* and eligible for copyright protection.” 2018 U.S. Dist. LEXIS 89532 at *15 (emphasis added). In other words, instead of separately identifying design features and then analyzing whether they are PGS works standing on their own, the court in *Silvertop* identified some individual features (many of which were utilitarian in any event) and then re-combined them and concluded the design *as a whole* was separable.

Justice Breyer raised this precise concern in his dissent in *Star Athletica*, hinting that the majority’s test could lead to a person attempting to copyright a shovel. 137 S. Ct. at 1033-34. Though his example seemed perhaps overly dramatic at the time, it is not a broad leap of logic



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from the ruling in *Silvertop*. If a court can identify an item as a useful article and then deem its design as a whole to be separable, the line between useful articles and artistic works becomes rather blurred indeed. The result in *Silvertop* highlights one of the concerns frequently raised by commentators in the wake of the *Star Athletica* decision, that it could encourage parties to seek copyright protection for things that ought to fall within the patent realm. See, e.g., Christopher Buccafusco and Jeanne C. Fromer, *Fashion's Function in Intellectual Property Law*, 93 Notre Dame L. Rev. 51, 62-64 (2017).

Keeping those realms separate is important for a variety of reasons. First, the bar for obtaining patent protection is rather high, involving a rigorous, time-consuming, and expensive eligibility review by the Patent and Trademark Office. See 35 U.S.C. §§ 101-103, 131. By comparison, obtaining a copyright is far easier in that registration is not even required. Once a work is fixed in a tangible medium, a copyright is created without more. Even if one elects to seek registration, the Copyright Office does little to no screening to weed out illegitimate claims, and the standard for originality is fairly low. See 17 U.S.C. 102(a) and *Feist Publ'ns, Inc. v. Rural Tel. Serv. Co.*, 499 U.S. 340, 345-47 (1991). Second, while a patent can provide its owner with 20 years of protection, copyright protection lasts for the life of the artist plus an additional 70 years. See 17 U.S.C. § 302(a).

If *Star Athletica* is read to allow greater copyright protection for the design of useful articles, it could create an incentive to choose copyrights over patents. After all, if a person can protect the same design more easily and for far longer through copyright, why not go that route instead? Creative intellectual property attorneys will undoubtedly seek to push the envelope.

The fashion industry has already taken notice of the possibilities—a fact that is illustrated by the relatively rare occurrence of a Supreme Court opinion being the subject of an article in *Vogue* magazine. Steff Yotka, *What the Supreme Court's First Ruling on Fashion Copyrights Means for the Runway*, *Vogue Magazine*, Mar. 23, 2017, available at [*ica-varsity-brands-ruling-fashion-industry*. The article highlighted the difficulty in differentiating between functional and decorative elements of certain garments and predicted that fashion designers, and their attorneys, would attempt to exploit any gray area created by the *Star Athletica* decision. Rulings like the one in *Silvertop* are certain to encourage this result.](https://www.vogue.com/article/supreme-court-star-athlet-</p></div><div data-bbox=)

To be sure, designers—including those in Hawaii—already faced a series of decisions when seeking to protect their works. With respect to copyrights, the first question is whether to bother seeking a registration at all. As mentioned above, copyrights are created once a work is fixed in a tangible form. These rights attach even in the absence of

a formal registration, and they can still be enforced. Gaining a registration, however, provides additional advantages such as a presumption of validity (if the registration is obtained within five years of first publication) and access to certain remedies such as statutory damages and attorneys' fees. See 17 U.S.C. § 401. A party thus has to weigh the pros and cons of seeking a registration and decide whether the cost and hassle is worth it. Particularly in Hawaii, a designer might also weigh the scope of the market in which he intends to sell. If that market is

strictly local, for example, perhaps the federal registration might not be valued as highly as it would be by a company seeking to compete and sell on the mainland.

In an informal review of some of the biggest and best-known local aloha wear companies, a dichotomy emerges, as they tend to take an all or nothing approach. For example, two such companies have well over 1,000 federal copyright registrations each for their aloha wear design patterns. Meanwhile, some other well-known establishments have zero registrations or only a handful. If the commentators are correct that *Star Athletica* has broadened the scope of what might be eligible for copyright protection, though, it could result in more local companies seeking registrations for their designs.

In addition to affecting the question of whether to register, *Star Athletica* might also alter a local company's ap-

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proach regarding *what* to register. As mentioned above, the sort of fabric pattern designs seen in aloha wear have long been eligible for copyright protection. *See, e.g., Folio Impressions, Inc. v. Byer California*, 937 F.2d 759 (2d Cir. 1991); *Knitwaves, Inc. v. Lollytogs Ltd.*, 71 F.3d 996 (2d Cir. 1995); *Hamil Am., Inc. v. GFI, Inc.*, 193 F.3d 92 (2d Cir. 1999). Now, though, a company might wonder whether it is better to register the fabric pattern alone or, like Varsity, submit illustrations of the pattern on a shirt or dress. While the effect arguably would be the same in that the pattern alone would be protected in either event, the submission of the full garment could expand the scope of protection to include other elements.

Unlike a patent, which is defined by its claims, a copyright registration does not require a full delineation of what is being

protected or for what purpose. One commentator has expressed concern that the *Star Athletica* decision will allow parties to wait until litigation arises before defining precisely what they intended to be eligible for protection. Mark P. McKenna, *Knowing Separability When We See It*, 166 U. Pa. L. Rev. Online 127, 133-34 (2017), <http://www.pennlawreview.com/online/166-U-Pa-L-Rev-Online-127.pdf>. The analysis in *Star Athletica* turned on what aspect of the design was to be “separately imagined.” *Id.* But, as McKenna points out, a litigating party has great influence on defining that inquiry. *Id.* As such, there is incentive to submit broader images with a copyright registration and defer defining what is protected until a dispute has arisen.

This is particularly so for companies like aloha wear manufacturers, because the fabric pattern will likely be protected regardless (assuming it meets the other criteria such as originality), but by depict-

ing the garment as a whole, other design elements might possibly come along for the ride. To the extent a company might want to use the same pattern in a shirt and a dress or other garment, it could seek separate registrations for the pattern alone and the individual garments as well, just to cover its bases.

It certainly appears, then, that the *Star Athletica* decision may have generated more questions than it answered. At the very least, the ruling has given clothing designers in Hawaii and elsewhere some more things to think about when deciding how best to protect their works.

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