

NILL No. 013319

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Attorneys for Plaintiff  
PELE DEFENSE FUND

IN THE CIRCUIT COURT OF THE THIRD CIRCUIT

STATE OF HAWAII

|                       |   |                                  |
|-----------------------|---|----------------------------------|
| PELE DEFENSE FUND,    | ) | CIVIL NO. 89-089 (Hilo)          |
|                       | ) | (Declaratory Judgment/           |
| Plaintiff,            | ) | Injunction)                      |
|                       | ) |                                  |
| vs.                   | ) | NOTICE OF H.R.C.P. RULE 30(b)(6) |
|                       | ) | RE: ORAL DEPOSITION OF TRUE      |
| WILLIAM PATY, et al., | ) | ENERGY GEOTHERMAL CORP.;         |
|                       | ) | CERTIFICATE OF SERVICE           |
| Defendants.           | ) |                                  |
|                       | ) |                                  |

NOTICE OF H.R.C.P. RULE 30(b)(6) RE:  
ORAL DEPOSITION OF TRUE ENERGY GEOTHERMAL CORP.

TO: Michael W. Gibson, Esq.  
Ashford & Wriston  
Suite 1400, Alii Place  
1099 Alakea Street  
Honolulu, Hawaii 96813

Attorney for Defendants  
THE ESTATE OF JAMES CAMPBELL, Deceased,  
F.E. TROTTER, W.H. MCVAY, P.R. CASSIDAY,  
Trustees under the Will and of the Estate  
of James Campbell, Deceased, acting in

their fiduciary and not in their individual capacities, and HERBERT C. CORNUELLE

Benjamin M. Matsubara, Esq.  
Gary B.K.T. Lee, Esq.  
Jason M. Yoshida, Esq.  
Matsubara, Lee & Kotake  
Suite 800, Kendall Building  
888 Mililani Street  
Honolulu, Hawaii 96813

Attorneys for Defendants  
TRUE ENERGY GEOTHERMAL CORP.,  
TRUE GEOTHERMAL DRILLING CO., and  
MID-PACIFIC GEOTHERMAL, INC.

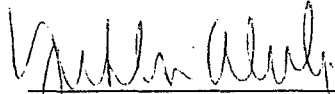
PLEASE TAKE NOTICE that beginning on April 20, 1993, at 1:30 p.m., at the offices of Native Hawaiian Legal Corporation, 1164 Bishop Centre, 1164 Bishop Street, Suite 1205, Honolulu, Hawaii 96813, pursuant to Rule 30(b)(6) of the Hawaii Rules of Civil Procedure, Plaintiff PELE DEFENSE FUND, through its counsel, will take the deposition upon oral examination of the officer, director, managing agent, employee or other person who, Defendant TRUE ENERGY GEOTHERMAL CORP. shall designate, and who shall consent to testify on its behalf, who is most knowledgeable as to the policy of Defendant TRUE ENERGY GEOTHERMAL CORP., viz entry onto its geothermal site and access road in Puna, its lease with Campbell Estate for lands situated in the Wao Kele O' Puna, its drilling methods on said lands, proposed development of geothermal drill sites on said lands and procedures it will take to preserve and identify existing burial sites on said lands in compliance with H.R.S. § 6E-11, 43 and 43.6.

Said deposition shall be taken before a notary public or other person duly authorized to administer oaths, and shall

continue from day to day, until completed.

Said deposition shall be used for discovery and/or trial purposes of the above-entitled action.

DATED: Honolulu, Hawaii, March 31, 1993.



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ALAN T. MURAKAMI  
PAUL F. N. LUCAS  
STEVEN C. MOORE  
YUKLIN ALULI  
Attorney for Plaintiff  
PELE DEFENSE FUND

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|                       | ) |                         |
| vs.                   | ) | CERTIFICATE OF SERVICE  |
|                       | ) |                         |
| WILLIAM PATY, et al., | ) |                         |
|                       | ) |                         |
| Defendants.           | ) |                         |
|                       | ) |                         |

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 31, 1993, a true copy of the foregoing document was duly served upon the following parties by placing the same in the U.S. mail, postage prepaid, to their last known addresses:

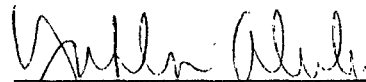
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DATED: Honolulu, Hawaii, March 31, 1993.



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PAUL F. N. LUCAS  
STEVEN C. MOORE  
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Attorney for Plaintiff  
PELE DEFENSE FUND