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INDIAN LAW SUPPORT CENTER  
APR 23 1993

Attorneys for Defendants

The Estate of James Campbell, Deceased,  
W. H. McVay and P. R. Cassidy,  
Trustees Under the Will and of  
the Estate of James Campbell, Deceased,  
acting in their fiduciary and not in  
their individual capacities, Herbert  
C. Cornuelle and F.E. Trotter

IN THE CIRCUIT COURT OF THE THIRD CIRCUIT

STATE OF HAWAII

PELE DEFENSE FUND,

Plaintiff,

v.

WILLIAM PATY, in his capacity as  
Chairman of the Board of Land  
and Natural Resources, State of  
Hawaii, MOSES KEALOHA, DOUGLAS  
ING, LEONARD ZALOPANY, JOHN  
ARISUMI and HERBERT ARATA, in  
their capacity as members of the  
Board of Land and Natural  
Resources; The Estate of JAMES  
CAMPBELL, Deceased, FRED E.  
TROTTER, W.H. McVAY, P.B.  
CASSIDAY, and HERBERT C.  
CORNUELLE, in their fiduciary  
capacity as Trustees under the  
Will of James Campbell,  
Deceased; TRUE ENERGY GEOTHERMAL  
CORP., TRUE GEOTHERMAL DRILLING  
CO., and MID-PACIFIC GEOTHERMAL  
INC.,

Defendants.

CIVIL NO. 89-089 (Hilo)  
(Declaratory Judgment/  
Injunction)

DEFENDANTS THE ESTATE OF  
JAMES CAMPBELL, DECEASED, W.  
H. McVAY AND 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,  
HERBERT C. CORNUELLE AND F.E.  
TROTTER'S JOINDER IN STATE OF  
HAWAII'S MOTION FOR  
PROTECTIVE ORDER, AND AN  
ORDER TO QUASH SUBPOENA DUCES  
TECUM, FILED ON APRIL 16,  
1993; CERTIFICATE OF SERVICE

Hearing Date: April 21, 1993  
(By Telephone Conference)  
Hearing Time: 9:30 a.m.  
Hearing Judge: The Honorable  
Ricki Amano

DEFENDANTS THE ESTATE OF JAMES CAMPBELL, DECEASED,  
W. H. MCVAY AND 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, HERBERT C. CORNUELLE  
AND F.E. TROTTER'S JOINDER IN STATE OF HAWAII'S  
MOTION FOR PROTECTIVE ORDER, AND AN ORDER TO  
QUASH SUBPOENA DUCES TECUM, FILED ON APRIL 16, 1993

Defendants The Estate of James Campbell, Deceased, W.H. McVay and 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 (hereinafter collectively referred to as "Defendants Campbell Estate") join in the State of Hawaii's Motion for Protective Order, and an Order to Quash Subpoena Duces Tecum, filed on April 16, 1993. Defendants Campbell Estate incorporate and rely upon the Memorandum in Support of State of Hawaii's Motion for Protective Order, and an Order to Quash Subpoena Duces Tecum.

Defendants Campbell Estate do not wish to participate in the hearing via telephone conference call scheduled for April 21, 1993 at 9:30 a.m. on this Motion.

DATED: Kailua-Kona, Hawaii; April 19, 1993.

  
WAYNE NASSER

MICHAEL W. GIBSON

Attorneys for Defendants

The Estate of James

Campbell, Deceased, W. H.

McVay and 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, Herbert C.

Cornuelle and F.E. Trotter

IN THE CIRCUIT COURT OF THE THIRD CIRCUIT

STATE OF HAWAII

PELE DEFENSE FUND, ) CIVIL NO. 89-089 (Hilo)  
) (Declaratory Judgment/  
) Injunction)  
Plaintiffs, )  
) CERTIFICATE OF SERVICE  
vs. )

WILLIAM PATY, in his capacity as )  
Chairman of the Board of Land )  
and Natural Resources, State of )  
Hawaii, MOSES KEALOHA, DOUGLAS )  
ING, LEONARD KATGEANT, JOHN )  
ARISUMI and HERBERT ARATA, in )  
their capacity as members of the )  
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Resources; The Estate of JAMES )  
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CASSIDAY, and HERBERT C. )  
CORNUELLE, in their fiduciary )  
capacity as Trustees under the )  
Will of James Campbell, )  
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CORP., TRUE GEOTHERMAL DRILLING )  
CO., and MID-PACIFIC GEOTHERMAL )  
INC., )  
Defendants. )

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date set forth below service of a copy of the foregoing document was made upon the parties below, at their last known addresses in the manner described below:

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( )

(x)

Attorneys for Defendants

True Energy Geothermal Corp., True  
Geothermal Drilling Co. and  
Mid-Pacific Geothermal Inc.

DATED: Kailua-Kona, Hawaii; April 19, 1993.

  
WAYNE NASSER  
MICHAEL W. GIBSON  
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