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Telephone: (303) 447-8760

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 TAKING DEPOSITIONS
	)	UPON WRITTEN QUESTIONS;
WILLIAM PATY, et al.,	)	QUESTIONS; CERTIFICATE OF
	)	SERVICE
Defendants.	)	
	)	

NOTICE OF TAKING DEPOSITIONS  
UPON WRITTEN QUESTIONS

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

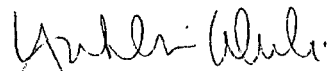
PLEASE TAKE NOTICE that Plaintiff PELE DEFENSE FUND shall take the depositions of the following individuals on the date and time as listed below:

<u>NAME</u>	<u>DATE/TIME</u>
Custodian of Records Hawaii Asset Management Estate of James Campbell Suite 500, 828 Fort Street Mall Honolulu, Hawaii 96813	Monday, May 10, 1993 @ 10:00 a.m.
Custodian of Records True Geothermal Energy Co., True Geothermal Drilling Co., and Mid-Pacific Geothermal, Inc. c/o Corporation Company, Inc. 1000 Bishop Street Honolulu, Hawaii 96813	Monday, May 10, 1993 @ 11:00 a.m.

Said depositions will be taken at the office of Yuklin Aluli, 415-C Uluniu Street, Kailua, Hawaii, before a notary public duly sworn to administer oaths, and shall be upon written questions, a copy of which are attached hereto, and such cross, redirect and recross questions as may be served herein, pursuant to Rule 31 of the Hawaii Rules of Civil Procedure.

The above deponents will be required by Subpoena Duces Tecum to have available any and all records pertaining to all items listed in said Subpoena Duces Tecum.

DATED: Honolulu, Hawaii, April 22, 1993.



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YUKLIN ALULI  
PAUL F. N. LUCAS  
ARNOLD L. LUM  
STEVEN C. MOORE  
Attorneys for Plaintiff  
PELE DEFENSE FUND

## QUESTIONS

Questions to be propounded to witnesses named in the attached Notice, whose addresses are set forth therein, on behalf of Plaintiffs by a notary public duly authorized to administer oaths at the office of Yuklin Aluli, 415-C Uluniu Street, Kailua, Hawaii:

1. Please state your name.
2. What is your residence address?
3. Are you employed?
4. What is your employer's name and address?
5. What is your job or position with your employer?
6. In that position, do you have under your care, custody and/or control the items listed in the Subpoena Duces Tecum which was served upon you?
7. Were you served with a Subpoena Duces Tecum requiring your appearance before the Notary Public for the purpose of answering these questions and requiring you to bring with you the items listed below?
8. Do you have all of the records with you?
9. Are those records complete?
10. If not, what is missing?
11. Has any portion of those records ever been removed from your care, custody and/or control prior to this time?
12. If so, when and by whom?
13. Has any portion of those records ever been altered prior to this time?

14. If so, when and by whom?

15. What identifies those records as pertaining to the above-mentioned person?

16. Would you please turn over to the Notary Public at this time the originals or complete and legible copies of the items listed in the Subpoena Duces Tecum?

17. Please describe briefly but completely, so that they may be readily identified as your employer's records pertaining to those items required in the Subpoena Duces Tecum, those items which you have turned over to the Notary Public.

18. Please describe briefly but completely, so that they may be readily identified as your employer's records pertaining to those items required in the Subpoena Duces Tecum, those items which you have turned over to the Notary Public, including both those which you have brought with you and those which you have not brought with you as follows:

(a) The author.

(b) The date.

(c) The addressee.

(d) The grounds why it is being withheld.

19. Have these records been kept by your employer in the ordinary course of the employer's business?

IN THE CIRCUIT COURT OF THE THIRD CIRCUIT

STATE OF HAWAII

PELE DEFENSE FUND,	)	CIVIL NO. 89-089 (Hilo)
	)	(Declaratory Judgment/
Plaintiff,	)	Injunction)
	)	
vs.	)	CERTIFICATE OF SERVICE
	)	
WILLIAM PATY, et al.,	)	
	)	
Defendants.	)	
<hr/>		

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 22, 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:

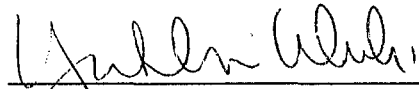
Michael W. Gibson, Esq.  
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TRUE GEOTHERMAL DRILLING CO., and  
MID-PACIFIC GEOTHERMAL, INC.

DATED: Honolulu, Hawaii, April 22, 1993.



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PAUL F. N. LUCAS  
ARNOLD L. LUM  
STEVEN C. MOORE  
Attorneys for Plaintiff  
PELE DEFENSE FUND