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HIRD CIRCUIT COURT
STATE OF HAWAII
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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 SUBMISSION OF PROPOSED
)	ORDER; EXHIBIT "A"; CERTIFICATE
WILLIAM PATY, et al.,)	OF SERVICE
)	
Defendants.)	
)	

NOTICE OF SUBMISSION OF PROPOSED ORDER

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.

NOTICE IS HEREBY GIVEN that Plaintiff PELE DEFENSE FUND
herein, by their attorney, Yuklin Aluli, have submitted the ORDER
GRANTING IN PART AND DENYING IN PART DEFENDANTS TRUE GEOTHERMAL
ENERGY CO., TRUE GEOTHERMAL DRILLING CO., AND MID-PACIFIC
GEOTHERMAL, INC.'S AND 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 MOTIONS FOR PROTECTIVE ORDER OR IN
THE ALTERNATIVE TO QUASH SUBPOENA DUCES TECUM FILED APRIL 12,
1993, which is attached hereto as Exhibit "A", to the above-
entitled Court for entry. You are further notified that you must
submit your objections or comments to the said Order within five
(5) days of your receipt of this Notice.

DATED: Honolulu, Hawaii, April 30, 1993.

A handwritten signature in cursive script, appearing to read 'Yuklin Aluli', is written over a horizontal line.

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

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Boulder, Colorado 80302
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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.)	ORDER GRANTING IN PART AND
)	DENYING IN PART DEFENDANTS TRUE
WILLIAM PATY, et al.,)	GEOTHERMAL ENERGY CO., TRUE
)	GEOTHERMAL DRILLING CO., AND
Defendants.)	MID-PACIFIC GEOTHERMAL, INC.'S
)	AND 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
)	MOTIONS FOR PROTECTIVE ORDER OR
)	IN THE ALTERNATIVE TO QUASH
)	SUBPOENA DUCES TECUM FILED APRIL
)	12, 1993
)	
)	Hearing
)	

) Date: April 16, 1993
) Time: 8:30 a.m.
) Judge: Riki May Amano

ORDER GRANTING IN PART AND DENYING IN PART DEFENDANTS TRUE GEOTHERMAL ENERGY CO., TRUE GEOTHERMAL DRILLING CO., AND MID-PACIFIC GEOTHERMAL, INC.'S AND 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 MOTIONS FOR PROTECTIVE ORDER OR IN THE ALTERNATIVE TO QUASH SUBPOENA DUCES TECUM FILED APRIL 12, 1993

This matter having come on for hearing on April 16, 1993 at 8:30 a.m. before the Honorable Riki May Amano, Judge of the Third Circuit Court, in her courtroom at 75 Aupuni Street, Hilo, Hawaii, Gary B.K.T. Lee appearing on behalf of Defendants TRUE GEOTHERMAL ENERGY CO., TRUE GEOTHERMAL DRILLING CO., AND MID-PACIFIC GEOTHERMAL, INC. (Defendants True), Michael W. Gibson appearing on behalf of 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 (Defendants Campbell) and Yuklin Aluli appearing on behalf of Plaintiff PELE DEFENSE FUND, based on the pleadings and records herein, the arguments of counsel and for good cause,

IT IS HEREBY ORDERED and DECREED:

1. On or before April 26, 1993, Defendants True, through its counsel, shall submit to this Court the lease, together with proposed deletions based on Defendants True's assertions that

portions of the lease contain proprietary information falling within the parameters of Hawaii Rules of Civil Procedure Rule 26(c)(7). The lease shall then be produced to Plaintiff, subject to deletions approved by the Court.

2. Defendants True and Campbell shall produce for inspection and copying for Plaintiff, at a time after May 7, 1993, the lease or other legal documents embodying the legal relationship between Defendants True and the Campbell Estate, or other document embodying the right of Defendants True to enter onto the lands described in Land Patent No. S-15; all permits, issued by the State of Hawaii or the County of Hawaii, or other governmental subdivision of the state, for the construction of access roads and well sites on the lands described in Land Patent No. S-15; and all permit applications including unsubmitted permit applications and rough drafts of permit applications for the construction of access roads and well sites on the lands described in Land Patent No. S-15.

DATED: Hilo, Hawaii, _____.

JUDGE OF THE ABOVE-ENTITLED COURT

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Pele Defense Fund v. Paty, et al.; Civil No. 89-089 (Hilo), Order Granting In Part And Denying In Part Defendants True Geothermal Energy Co., True Geothermal Drilling Co., And Mid-Pacific Geothermal, Inc.'s And 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 Motions For Protective Order Or In The Alternative To Quash Subpoena Duces Tecum Filed April 12, 1993

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APPROVED AS TO FORM:

GARY B.K.T. LEE
Attorney for Defendants
TRUE GEOTHERMAL ENERGY CO.,
TRUE GEOTHERMAL DRILLING CO.,
and MID-PACIFIC GEOTHERMAL, INC.

MICHAEL W. GIBSON
Attorney 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



YUKLIN ALULI
Attorney for Plaintiff
PELE DEFENSE FUND

=====

Pele Defense Fund v. Paty, et al.; Civil No. 89-089 (Hilo), Order Granting In Part And Denying In Part Defendants True Geothermal Energy Co., True Geothermal Drilling Co., And Mid-Pacific Geothermal, Inc.'s And 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 Motions For Protective Order Or In The Alternative To Quash Subpoena Duces Tecum Filed April 12, 1993

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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.)	
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 30, 1993, a true copy of the foregoing document was duly served upon the following parties by hand delivering the same to their last known addresses:

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
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Benjamin M. Matsubara, Esq.
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Jason M. Yoshida, Esq.
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Attorneys for Defendants
TRUE GEOTHERMAL ENERGY CORP.,
TRUE GEOTHERMAL DRILLING CO., and
MID-PACIFIC GEOTHERMAL, INC.

DATED: Honolulu, Hawaii, April 30, 1993.

A handwritten signature in cursive script, appearing to read 'Yuklin Aluli', is written over a horizontal line.

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