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CHARLENE K. OKAWA
CLERK

YUKLIN ALULI 1428
415-C Uluniu Street
Kailua, Hawaii 96734
Telephone: (808) 262-5900

NATIVE HAWAIIAN LEGAL CORPORATION
1164 Bishop Centre
1164 Bishop Street, Suite 1205
Honolulu, Hawaii 96813
Telephone: (808) 521-2302

PAUL F. N. LUCAS 4561
ARNOLD L. LUM 3523

STEVEN C. MOORE
NATIVE AMERICAN RIGHTS FUND
1506 Broadway
Boulder, Colorado 80302
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.)	SECOND AMENDED NOTICE OF TAKING
)	DEPOSITIONS UPON WRITTEN
WILLIAM PATY, et al.,)	QUESTIONS; QUESTIONS;
)	CERTIFICATE OF SERVICE
Defendants.)	
)	

SECOND AMENDED 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,
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

Benjamin M. Matsubara, Esq.
Stephanie A. Rezens, Esq.
Jason M. Yoshida, Esq.
Matsubara, Lee & Kotake
Suite 800, Kendall Building
888 Mililani Street
Honolulu, Hawaii 96813

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

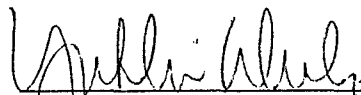
PLEASE TAKE NOTICE that Plaintiff PELE DEFENSE FUND shall take the depositions of the following individuals on the date and time as listed below:

<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 24, 1993 @ 9:00 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 24, 1993 @ 10:00 a.m.

Said depositions will be taken at the offices of Powers and Associates, Suite 450, Pauahi Tower, 1001 Bishop Street, Honolulu, 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, May 13, 1993.

A handwritten signature in dark ink, 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

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 offices Powers and Associates, Suite 450, Pauahi Tower, 1001 Bishop Street, Honolulu, 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.)	
_____)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 13, 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,
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
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TRUE GEOTHERMAL ENERGY CO.,
TRUE GEOTHERMAL DRILLING CO., and
MID-PACIFIC GEOTHERMAL, INC.

DATED: Honolulu, Hawaii, May 13, 1993.

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