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[Additional Counsel Listed After Caption]

Attorneys for Plaintiffs CITY AND
COUNTY OF HONOLULU and HONOLULU
BOARD OF WATER SUPPLY

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

CITY AND COUNTY OF HONOLULU and
HONOLULU BOARD OF WATER
SUPPLY,

Plaintiffs,

vs.

SUNOCO LP; ALOHA PETROLEUM,
LTD.; ALOHA PETROLEUM LLC; EXXON
MOBIL CORP.; EXXONMOBIL OIL
CORPORATION; ROYAL DUTCH SHELL
PLC; SHELL OIL COMPANY; SHELL OIL
PRODUCTS COMPANY LLC; CHEVRON
CORP.; CHEVRON USA INC.; BHP GROUP
LIMITED; BHP GROUP PLC; BHP
HAWAII INC.; BP PLC; BP AMERICA
INC.; MARATHON PETROLEUM CORP.;
CONOCOPHILLIPS; CONOCOPHILLIPS
COMPANY; PHILLIPS 66; PHILLIPS 66
COMPANY; AND DOES 1 through 100,
inclusive,

Defendants.

CIVIL NO. 1CCV-20-0000380 (LWC)

(Other Non-Vehicle Tort)

**PLAINTIFFS' NOTICE OF TAKING
DEPOSITION UPON WRITTEN
QUESTIONS; EXHIBITS A and B;
CERTIFICATE OF SERVICE**

[Custodian of Records of American Petroleum
Institute]

The Honorable Lisa W. Cataldo
Courtroom/Division: First Circuit, 9th Division

Trial Date: May 8, 2029

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PLAINTIFFS' NOTICE OF TAKING DEPOSITION UPON WRITTEN QUESTIONS

PLEASE TAKE NOTICE that Plaintiffs City and County of Honolulu and Honolulu Board of Water Supply ("Plaintiffs"), by and through their attorneys of record, will take the following remote deposition on the date and time as indicated below or at such date, time, and place as counsel may agree upon:

WITNESS

Custodian of Records of American Petroleum
Institute
200 Massachusetts Avenue, NW,
Washington, D.C. 20001

DATE and TIME

July 27, 2026 at 2:00 p.m. (Eastern
Time)
Via Zoom Videoconference

The deposition shall be taken upon the questions attached hereto as Exhibit "A," and such cross, redirect and recross questions as may be duly served herein. The testimony will be recorded by stenographic and/or videographic means by Hartford Reporting and Technology (855-443-3767), 7733 Forsyth Boulevard, Suite 1100, St. Louis, Missouri 63105, or another notary public, certified shorthand reporter, or court reporter authorized to administer oaths and take testimony in

the State of Hawai‘i and/or the District of Columbia. Information regarding remote access shall be provided before the deposition.

A copy of the Subpoena Duces Tecum attached hereto as Exhibit “B” will be served upon the deponent. The deposition will be taken upon written questions and shall be taken pursuant to Rules 28(a) and 31 of the Hawai‘i Rules of Civil Procedure.

Dated: June 12, 2026
Honolulu, Hawai‘i

Respectfully submitted,

DANA M.O. VIOLA
Corporation Counsel

/s/ Glenn H. Uesugi

PAUL S. AOKI
GLENN H. UESUGI
JEFF A. LAU
Deputies Corporation Counsel

Dated: June 12, 2026
San Francisco, CA

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/s/ William Liang

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*Attorneys for the City and County of Honolulu
and the Honolulu Board of Water Supply*

EXHIBIT A: WRITTEN QUESTIONS

1. Please state your full name and business address.
2. Are you employed?
3. What is your employer's name?
4. What is your employer's address?
5. What is your job or position with your employer?
6. In that position do you have under your care, custody and control any and all records kept by your employer pertaining to your employer's business?
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 any and all of the records of your employer identified in the subpoena duces tecum?
8. Do you have those records with you?
9. Were those records made or recorded at or near the time of occurrence, event(s), condition(s), or circumstance(s) of the matters set forth in those records?
10. Were those records made by, or from information transmitted by, persons with knowledge of those matters?
11. Are those records made or kept in the course of your employer's regularly conducted business activity?
12. Is it a regular practice of your employer's regularly conducted business activity to make or keep those records?
13. Are those records complete?
14. If not, what is missing?
15. Has any portion of those records ever been removed from your care, custody and control prior to this time?
16. If so, when and by whom?
17. Has any portion of those records ever been altered prior to this time?
18. If yes, when and by whom?

19. What identifies those records as pertaining to the records required by the subpoena duces tecum?
20. Would you please turn over to the notary public at this time the originals or complete, legible and true and correct copies of all of your employer's records pertaining to the above-mentioned documents, which you have brought with you pursuant to the requirements of the subpoena duces tecum with which you were served.
21. Please describe briefly but completely, so that they may be readily identified, any of your employer's records pertaining to the above-mentioned documents, which you have turned over to the notary public.
22. Please describe briefly but completely, so that they may be readily identified, any of your employer's records described in the subpoena duces tecum which you have not turned over to the notary public, including both those records which you have brought with you today and those records which you have not brought with you.
23. Are you willing to waive the reading and signing of this deposition?

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 12, 2026, a file-marked copy of the foregoing document was duly served electronically upon the following parties through local counsel via JEFS.

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Dated: June 12, 2026

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