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7 BEFORE THE STATE OF WASHINGTON
8 ENERGY FACILITY SITING EVALUATION COUNCIL

9 In the Matter of the Application of:

10 Scout Clean Energy, LLC, for
11 Horse Heaven Wind Farm, LLC,
12 Applicant.

DOCKET NO. EF-210011

DECLARATION OF J. RICHARD
ARAMBURU IN SUPPORT OF
MOTION TO COMPEL
DEPOSITION

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14 I, J. Richard Aramburu, declare as follows:

- 15 1. I am over the age of eighteen years and competent to testify.
16 2. I am the attorney for Tri-Cities C.A.R.E.S., Intervenor in this proceeding.
17 3. Exhibit A to this declaration is an excerpt from a 2020 news article in a

18 Portland, Indiana newspaper discussing project manager Dave Kobus and Scout's
19 intention to add solar panels to their Benton County proposal.

20 4. Exhibit B is a portion of Scout's website describing Kobus and his role in
21 the Horse Heaven proposed project:
22 [https://horseheavencleanenergy.com/meet-dave-kobus-senior-project-manager-with-ho](https://horseheavencleanenergy.com/meet-dave-kobus-senior-project-manager-with-horse-heaven-clean-energy-center/)
23 [rse-heaven-clean-energy-center/](https://horseheavencleanenergy.com/meet-dave-kobus-senior-project-manager-with-horse-heaven-clean-energy-center/).

24 5. Exhibit C is the May 26, 2023, TCC notice of deposition to Scout and
25 other parties in which the Kobus deposition was noted for June 5, 2023.
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