

Steven J. Reisman
CURTIS, MALLET-PREVOST, COLT & MOSLE LLP
101 Park Avenue
New York, New York 10178-0061
Tel: (212) 696-6000
Fax: (212) 697-1559
E-mail: sreisman@cm-p.com

50-275/323

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

----- X
: CHAPTER 11
In re: :
: Bankruptcy
PACIFIC GAS AND ELECTRIC : Case No.: 01-30923 (DM)
COMPANY, a California corporation, :
Debtor. :
----- X

NOTICE OF SPECIAL APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that, the law firm set forth below appears as counsel for a party-in-interest in the **PACIFIC GAS AND ELECTRIC COMPANY** (the "Debtor") Chapter 11 bankruptcy case, and pursuant to Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Title 11 of the United States Code, as amended (the "Bankruptcy Code"), requests that the following name and address be added to the mailing list maintained by the Clerk of Court and Debtor's counsel in the **PACIFIC GAS AND ELECTRIC COMPANY** Chapter 11 bankruptcy case and further demands that all notices given or required to be given in this case and all papers served or required to be served in this case by all counsel, parties-in-interest, and this Court be given to and served upon the following counsel:

**Steven J. Reisman
CURTIS, MALLET-PREVOST, COLT & MOSLE LLP
101 Park Avenue
New York, New York 10178-0061
Tel: (212) 696-6000
Fax: (212) 697-1559
E-mail: sreisman@cm-p.com**

Acc
0/1

PLEASE TAKE FURTHER NOTICE that, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and Bankruptcy Code set forth above, but also includes, without limitation, orders and notices of, any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted, conveyed by mail, hand delivery, telephone, telegraph, telex, e-mail or otherwise, which affects the Debtor or property of the Debtor or the rights of creditors and parties-in-interest.

PLEASE TAKE FURTHER NOTICE that, the party in interest does not intend this Notice of Special Appearance and Demand for Service of Papers or any later appearance or pleading be deemed or construed to be a waiver of its rights: (i) to have final orders in non-core matters entered only after de novo review by a District Judge; (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; and (iv) to any other rights, claims actions, setoffs, or recoupments to which it is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments, said party in interest expressly reserves.

Dated: New York, New York
April 9, 2001

**CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP**

By: 

Steven J. Reisman
101 Park Avenue
New York, New York 10178-0061
Tel: (212) 696-6000
Fax: (212) 697-1559

To: Attached Service List