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12 Counsel to MBIA Insurance Corporation

13 UNITED STATES BANKRUPTCY COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION

16 In re:

Case No. 01-30923

17 PACIFIC GAS AND ELECTRIC  
18 COMPANY, a California corporation

Chapter 11 Case

19 Debtor.

20 **NOTICE OF APPEARANCE AND REQUEST FOR**  
21 **SERVICE OF ALL NOTICES AND PAPERS**

22 PLEASE TAKE NOTICE that, pursuant to Bankruptcy Rule 9010(b),

23 Cadwalader, Wickersham & Taft hereby enters its appearance on behalf of **MBIA**

24 **INSURANCE CORPORATION**, which is a creditor and party-in-interest in the above-  
25 captioned bankruptcy case, and respectfully requests that all notices that are required to  
26 be given in this case and all papers that are required to be served in this case pursuant to  
27 rules 2002, 3017(a) and 9010(b) of the Federal Rules of Bankruptcy Procedure (the  
28 "Bankruptcy Rules"), or any other Bankruptcy Rules, local rules or provisions of title

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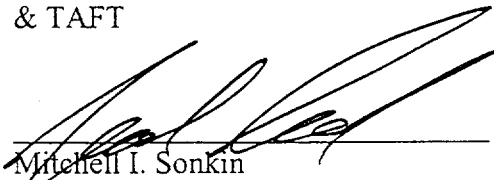
1 11 of the United States Code (the "Bankruptcy Code"), be given to and served upon  
2 Mitchell I. Sonkin and Mark C. Ellenberg at the addresses set forth below.

3 PLEASE TAKE FURTHER NOTICE that, pursuant to §1109(b) of the  
4 Bankruptcy Code, the foregoing request includes not only notices and papers referred to  
5 in the Bankruptcy Rules specified above, but also includes, without limitation, notices of  
6 any application, order, complaint, demand, hearing, motion, petition, pleading or request,  
7 whether formal or informal, whether written or oral, and whether transmitted or conveyed  
8 by mail delivery, telephone, telegraph, telex or otherwise that (1) affects or seeks to affect  
9 in any way any rights or interests of any creditor or party in interest in this case, with  
10 respect to the (a) debtor, (b) property of the debtor's estate, or proceeds thereof, in which  
11 the debtor may claim an interest, or (c) property or proceeds thereof in the possession,  
12 custody, or control of others that the debtor may seek to use; or (2) requires or seeks to  
13 require any act, delivery of any property, payment or other conduct.  
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15  
16 PLEASE TAKE FURTHER NOTICE that **MBIA INSURANCE**  
17 **CORPORATION** intends that neither this Notice of Appearance nor any later  
18 appearance, pleading, claim or suit shall waive: (1) its right to trial by jury in any  
19 proceeding so triable in this case or any case, controversy, or proceeding related to this  
20 case; or (2) any other rights, claims, actions, defenses, set-offs, or recoupments to which  
21 it is or may be entitled under agreements, in law, in equity, or otherwise, all of which  
22 rights, claims, actions, defenses, set-offs, and recoupments are expressly reserved.  
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1 Dated: New York, New York  
2 April 10, 2001

CADWALADER, WICKERSHAM  
& TAFT

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5   
6 Mitchell I. Sonkin  
7 100 Maiden Lane  
8 New York, NY 10038  
9 (212) 504-6000

10 - and -

11 Mark C. Ellenberg  
12 1201 F Street, N.W. Suite 1100  
13 Washington, DC 20004  
14 (202) 862-2200

15 Counsel to: MBIA Insurance Corporation  
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**CERTIFICATE OF SERVICE**

I am employed in the County of New York, State of New York, I am over the age of 18 and not a party to the within action. My business address is 100 Maiden Lane, New York, New York 10038.

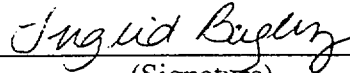
On April 10, 2001, I served the foregoing document described as **NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF ALL NOTICES AND PAPERS** on each interested party, as stated on the attached service list.

☒ (BY MAIL) I placed a true and correct copy of the foregoing documents in a sealed envelope addressed to each interested party, as stated on the attached service list. I placed each such envelope, with postage thereon fully prepaid, for collection and mailing at Cadwalader, Wickersham & Taft, New York, New York. I am readily familiar with Cadwalader, Wickersham & Taft's practice for collection and processing of correspondence for mailing with the United States Postal Service. Under that practice, the correspondence would be deposited in the United States Postal Service on that same day in the ordinary course of business.

Executed on April 10, 2001, at New York, New York

I declare under penalty of perjury that the foregoing is true and correct.

Ingrid M. Bagby  
(Type or print name)

  
(Signature)