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6 BP AMOCO

7
8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
11

12 In re:

13 PACIFIC GAS AND ELECTRIC COMPANY,
a California corporation,

14 Debtor.
15

Case No. SF-01-30923-DM

Chapter 11

**REQUEST FOR SPECIAL NOTICE AND
SERVICE OF PAPERS**

16 TO THE CLERK OF THE BANKRUPTCY COURT AND TO ALL PARTIES IN INTEREST:

17 PLEASE TAKE NOTICE that the undersigned, on behalf of secured creditor, BP Amoco
18 hereby demands, pursuant to Bankruptcy Rule 2002 and Section 1109(b) of the Bankruptcy
19 Code, that all notices given or required to be given, and all papers served in this case be
20 delivered to and served upon as follows:

21 William H. Kiekhofer, III, Esq.
Kelley Drye & Warren LLP
22 777 South Figueroa Street, Suite 2700
Los Angeles, California 90071
23 Telephone: (213) 689-1300
Facsimile: (213) 688-8150

Martin Marz, Esq.
BP Amoco
P.O. Box 3092
Houston, TX 77079
Telephone: (281) 366-5126
Facsimile: (281) 366-5901

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25 BP Amoco further requests that its attorneys be added to the Master Mailing List in this case.

26 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,
27 proof of claim, document, suit, motion nor any other writing or conduct, shall constitute a waiver
28 of BP Amoco's:

LA01/KIEKW/190439.1

REQUEST FOR SPECIAL NOTICE AND SERVICE OF PAPERS

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1 a. Right to have any and all final orders in any and all non-core matters entered only
2 after *de novo* review by a United States District Court Judge;

3 b. Right to trial by jury in any proceeding as to any and all matters so triable herein,
4 whether or not the same be designated legal or private rights, or in any case, controversy or
5 proceeding related hereto, notwithstanding the designation *vel non* of such matters as "core
6 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant
7 to statute or the United States Constitution;

8 c. Right to have the reference of this matter withdrawn by the United States District
9 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

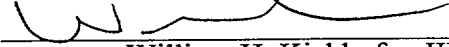
10 d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to
11 which BP Amoco is entitled under any agreements or at law or in equity or under the United
12 States Constitution.

13 All of the above rights are expressly reserved and preserved unto BP Amoco without
14 exception and with no purpose of confessing or conceding jurisdiction in any way by this filing
15 or by any other participation in these matters.

16 PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the
17 Bankruptcy Code and Rule 3017(a) of the Bankruptcy Rules, the foregoing demand includes not
18 only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also
19 includes, without limitation, all orders and notices of orders, applications, motions, memoranda,
20 declarations, disclosure statements, answering or reply papers, demands, complaints, petitions,
21 pleadings, requests, and other documents brought before this Court in this case, whether formal
22 or informal, written or oral, transmitted or conveyed by mail, delivery, telephone, telegraph,
23 telex, telecopy, personal delivery or any other means.

24 DATED: April 24, 2001

KELLEY DRYE & WARREN LLP

25 By: 
26 William H. Kiekhofer, III
27 Attorneys for Secured Creditor
28 BP AMOCO