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19 Co-Counsel to MBIA Insurance Corporation

20 UNITED STATES BANKRUPTCY COURT

21 NORTHERN DISTRICT OF CALIFORNIA

22 SAN FRANCISCO DIVISION

23 In re:

Case No. 01-30923

24 PACIFIC GAS AND ELECTRIC  
25 COMPANY, a California corporation

Chapter 11 Case

26 Debtor.

27 **AMENDED NOTICE OF APPEARANCE AND**  
28 **REQUEST FOR SERVICE OF ALL NOTICES AND PAPERS**

PLEASE TAKE NOTICE that, pursuant to Bankruptcy Rule 9010(b),  
Cadwalader, Wickersham & Taft and Buchalter, Nemer, Fields & Younger hereby enter  
appearances on behalf of **MBIA INSURANCE CORPORATION**, which is a creditor  
and party-in-interest in the above-captioned bankruptcy case, and respectfully request  
that all notices that are required to be given in this case and all papers that are required to

*App/ Add: E. Rids  
9/1 (Rids Ogc Mail Center)*

1 be served in this case pursuant to rules 2002, 3017(a) and 9010(b) of the Federal Rules of  
2 Bankruptcy Procedure (the "Bankruptcy Rules"), or any other Bankruptcy Rules, local  
3 rules or provisions of title 11 of the United States Code (the "Bankruptcy Code"), be  
4 given to and served upon the following parties at the addresses indicated below:  
5

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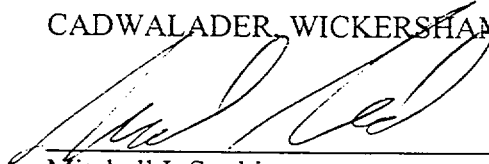
12 BUCHALTER, NEMER, FIELDS & YOUNGER	MBIA INSURANCE CORPORATION
13 Robert E. Izmirian	Beth Smayda, Director
14 Aron M. Oliner	113 King Street
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17 E-mail: rizmirian@buchalter.com	

1 PLEASE TAKE FURTHER NOTICE that, pursuant to §1109(b) of the  
2 Bankruptcy Code, the foregoing request supersedes all prior requests for notices made on  
3 behalf of MBIA Insurance Corporation, and includes not only notices and papers referred  
4 to in the Bankruptcy Rules specified above, but also includes, without limitation, notices  
5 of any application, order, complaint, demand, hearing, motion, petition, pleading or  
6 request, whether formal or informal, whether written or oral, and whether transmitted or  
7 conveyed by mail delivery, telephone, telegraph, telex or otherwise that (1) affects or  
8 seeks to affect in any way any rights or interests of any creditor or party in interest in this  
9 case, with respect to the (a) debtor, (b) property of the debtor's estate, or proceeds  
10 thereof, in which the debtor may claim an interest, or (c) property or proceeds thereof in  
11 the possession, custody, or control of others that the debtor may seek to use; or (2)  
12 requires or seeks to require any act, delivery of any property, payment or other conduct.  
13

14 PLEASE TAKE FURTHER NOTICE that **MBIA INSURANCE**  
15 **CORPORATION** intends that neither this Notice of Appearance nor any later  
16 appearance, pleading, claim or suit shall waive: (1) its right to trial by jury in any  
17 proceeding so triable in this case or any case, controversy, or proceeding related to this  
18 case; or (2) any other rights, claims, actions, defenses, set-offs, or recoupments to which  
19 it is or may be entitled under agreements, in law, in equity, or otherwise, all of which  
20 rights, claims, actions, defenses, set-offs, and recoupments are expressly reserved.  
21  
22  
23  
24  
25  
26  
27  
28

Dated: New York, New York  
April 19, 2001

CADWALADER, WICKERSHAM & TAFT



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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 20, 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 20, 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)

\_\_\_\_\_  
*Ingrid Bagby*  
(Signature)

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