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12 Attorneys for Debtor and Debtor In Possession  
13 PACIFIC GAS AND ELECTRIC COMPANY

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

17 In re  
18 PACIFIC GAS AND ELECTRIC  
19 COMPANY, a California corporation,  
20 Debtor.  
21 Federal I.D. No. 94-0742640

Case No. 01 30923 DM

Chapter 11 Case

Date: December 27, 2001  
Time: 1:30 p.m.  
Place: 235 Pine Street, 22nd Floor  
San Francisco, California  
Judge: Hon. Dennis Montali

22 REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PG&E'S MOTION (1)  
23 AUTHORIZING DEBTOR TO FILE CERTAIN PRELIMINARY OMNIBUS  
24 OBJECTIONS TO CLAIMS WITHOUT PREJUDICE TO RIGHT TO FILE  
25 SUBSEQUENT OBJECTIONS THERETO AND (2) WAIVING COMPLIANCE WITH  
26 FEDERAL RULES OF CIVIL PROCEDURE 26(a) AND (f) IN CERTAIN CLAIMS  
27 OBJECTION PROCEEDINGS  
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1 In accordance with Federal Rule of Evidence 201, Pacific Gas and Electric  
2 Company, the debtor and debtor in possession herein ("PG&E") respectfully requests that  
3 this Court, in its consideration of PG&E's Motion (1) Authorizing Debtor To File Certain  
4 Preliminary Omnibus Objections To Claims Without Prejudice To Right To File Subsequent  
5 Objections Thereto and (2) Waiving Compliance With Federal Rules Of Civil Procedure  
6 26(a) and (f) In Certain Claims Objection Proceedings filed herewith, take judicial notice of  
7 the information contained in the exhibits attached hereto.<sup>1</sup>

8 1. Exhibit 1 is a true and correct copy of the Pacific Gas & Electric  
9 Company's Omnibus Objections to Chromium Claims filed on November 14, 2001 by  
10 PG&E with this Court. See Mullis v. United States Bankruptcy Court, 828 F.2d 1385, 1388  
11 n.9 (9th Cir. 1987) (taking notice of same).

12 2. Exhibit 2 is a true and correct copy of the Notice of Objection and  
13 Objection to Claims of Baldwin Associates, Inc. filed on November 8, 2001 by PG&E with  
14 this Court. See Mullis, 828 F.2d at 1388.

HOWARD  
RICE  
NEMEROVSKI  
CANADY  
FALK  
& RABKIN  
A Professional Corporation

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26 <sup>1</sup>Pursuant to the Court's Case Management Order (revised April 25, 2001) at 4:2-6, copies of  
27 these exhibits are not attached to the service copies of this Request for Judicial Notice. Instead,  
28 copies of the exhibits are available and may be obtained by written request to rlopez@hrice.com or  
by sending a facsimile to Racquel N. Lopez at 415/217-5910. Copies of the exhibits will be mailed  
to you.

1 For the foregoing reasons, PG&E respectfully requests that the Court take judicial  
2 notice of each of the Exhibits accompanying this Request for Judicial Notice.

3  
4 DATED: December 7, 2001.

Respectfully,

5 HOWARD, RICE, NEMEROVSKI, CANADY,  
6 FALK & RABKIN  
A Professional Corporation

7  
8 By: 

CEIDE ZAPPARONI

9 Attorneys for Debtor and Debtor in Possession  
10 PACIFIC GAS AND ELECTRIC COMPANY

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