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 650 Town Center Drive, 7<sup>th</sup> Floor  
 4 Costa Mesa, CA 92626-7122  
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 6 Counsel to Creditor  
 HALCYON PARTNERS

7  
 8 UNITED STATES BANKRUPTCY COURT  
 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 In re:

11 PACIFIC GAS & ELECTRIC CO.,  
 12 Debtor

No. 01-30923-DM

CHAPTER 11

NOTICE OF APPEARANCE AND  
REQUEST FOR SPECIAL  
NOTICE

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 17 TO THE HONORABLE DENNIS MONTALI, UNITED STATES  
 18 BANKRUPTCY JUDGE, THE CLERK OF THE COURT, THE DEBTOR, THE  
 19 UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES ENTITLED  
 20 TO NOTICE:

21  
 22 PLEASE TAKE NOTICE that HALCYON PARTNERS ("Halcyon"),  
 23 hereby requests that all notices of all events relevant to the above-captioned  
 24 bankruptcy case, including without limitation adversary proceedings and  
 25 contested matters therein ("Bankruptcy Case"), and any and all copies of all  
 26 pleadings or documents filed in relation to the above-referenced Bankruptcy  
 27 Case, including all pleadings or notices required to be served on any party under  
 28

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NOTICE OF APPEARANCE AND  
 REQUEST FOR SPECIAL NOTICE

ADD: Rds Dgc mail center  
 Rec'd 01/18/02

1 Rule 2002 of the Federal Rules of Bankruptcy Procedure, be served on Halcyon  
2 as follows:

3 Pillsbury Winthrop LLP  
4 650 Town Center Drive, 7<sup>th</sup> Floor  
5 Costa Mesa, CA 92626-7122  
6 Attn: Mark D. Houle, Esq.  
7 Phone: (714) 436-6800  
8 Fax: (714) 436-2800

9 In addition, (1) Halcyon requests under Federal Rule of Bankruptcy  
10 Procedure 3017 that it receive service of copies of any disclosure statement or  
11 plan for which a party seeks approval and (2) that its attorneys be included on  
12 the Master Mailing List in this case.

13 Neither this Notice of Appearance and Request for Notice nor any  
14 subsequent appearance, pleading, claim, proof of claim, document, suit, motion  
15 nor any other writing or conduct, shall constitute a waiver of Halcyon's:

- 16 a. Right to have any and all final orders in any and all non-core  
17 matters entered only after de novo review by a United States  
18 District Court Judge;
- 19 b. right to trial by jury in any proceeding as to any and all matters so  
20 triable herein, whether or not the same be designated legal or  
21 private rights, or in any case, controversy or proceeding related  
22 hereto, notwithstanding the designation vel non of such matters as  
23 "core proceedings" pursuant to 28 U.S.C. Section 157(b)(2)(H), and  
24 whether such jury trial right is pursuant to statute or the United  
25 States Constitution;
- 26 c. right to have the reference of this matter withdrawn by the United  
27 States District Court in any matter or proceeding subject to  
28 mandatory or discretionary withdrawal; and

1 d. other rights, claims, actions, defenses, setoffs, recoupments or other  
2 matters to which this party is entitled under any agreements or at  
3 law or in equity or under the United States Constitution.

4 All of the above rights are expressly reserved and preserved unto Halcyon  
5 without exception and with no purpose of confessing or conceding jurisdiction in  
6 any way by this filing or by any other participation in these matters.

7 Dated: December 21, 2001

8 MARK D. HOULE  
9 PILLSBURY WINTHROP LLP  
650 Town Center Drive, 7<sup>th</sup> Floor  
10 Costa Mesa, CA 92626-7122

11  
12 By   
13 Mark D. Houle  
14 Attorneys for Creditor HALCYON  
PARTNERS

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