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CADWALADER, WICKERSHAM & TAFT
Mitchell I. Sonkin
100 Maiden Lane
New York, New York 10038
Telephone: (212) 504-6000
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50-275/323

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Counsel to MBIA Insurance Corporation

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:
PACIFIC GAS AND ELECTRIC
COMPANY, a California corporation
Debtor.

Case No. 01-30923
Chapter 11 Case

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

PLEASE TAKE NOTICE that, pursuant to Bankruptcy Rule 9010(b),
Cadwalader, Wickersham & Taft hereby enters its appearance on behalf of **MBIA
INSURANCE CORPORATION**, which is a creditor and party-in-interest in the above-
captioned bankruptcy case, and respectfully requests that all notices that are required to
be given in this case and all papers that are required to be served in this case pursuant to
rules 2002, 3017(a) and 9010(b) of the Federal Rules of Bankruptcy Procedure (the
"Bankruptcy Rules"), or any other Bankruptcy Rules, local rules or provisions of title

*A001
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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.

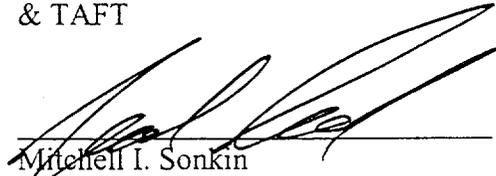
3 PLEASE TAKE FURTHER NOTICE that, pursuant to §1109(b) of the
4 Bankruptcy Code, the foregoing request includes not only notices and papers referred to
5 in the Bankruptcy Rules specified above, but also includes, without limitation, notices of
6 any application, order, complaint, demand, hearing, motion, 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.
14

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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Dated: New York, New York
April 10, 2001

CADWALADER, WICKERSHAM
& TAFT



Mitchell I. Sonkin
100 Maiden Lane
New York, NY 10038
(212) 504-6000

- and -

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

Counsel to: MBIA Insurance Corporation

CERTIFICATE OF SERVICE

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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)

Ingrid Bagby

(Signature)