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2 SHEARMAN & STERLING  
599 Lexington Avenue  
3 New York, New York 10022-6069  
4 Telephone: (212) 848-8000

50-275/323

5 Counsel for CITIBANK, N.A.

6 UNITED STATES BANKRUPTCY COURT  
7 NORTHERN DISTRICT OF CALIFORNIA

8 In re

9 PACIFIC GAS & ELECTRIC COMPANY,

10 Debtor.

Case No. 01-39023

Chapter 11

11 NOTICE OF APPEARANCE AND  
DEMAND FOR SERVICE OF PAPERS

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17 TO THE HONORABLE DENNIS MONTALI  
18 UNITED STATES BANKRUPTCY JUDGE:

19 PLEASE TAKE NOTICE, that Citibank, N.A. hereby appears by its counsel,  
20 Shearman & Sterling, and demands pursuant to rules 2002(g) and 9010(b), of the Federal Rules of  
21 Bankruptcy Procedure, that all notices given in the case and all papers served or required to be  
22 served in the case, be given to served upon the undersigned attorneys on its behalf, at the address  
23 set forth below, attention:

24 **Douglas P. Bartner**  
25 **Shearman & Sterling**  
26 **599 Lexington Avenue**  
27 **New York, NY 10022-6069**  
28 **Telephone: (212) 848-4000**  
**Facsimile: (212) 848-7179**

and to

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**Andrew Tenzer**  
**Shearman & Sterling**  
**599 Lexington Avenue**  
**New York, NY 10022-6069**  
**Telephone: (212) 848-4000**  
**Facsimile: (212) 848-7179**

PLEASE TAKE FURTHER NOTICE, pursuant to Section 1109(b) of the  
Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the  
Bankruptcy Rules and provisions specified above, but also includes without limitation, orders and  
notices of any application, motion, petition, pleading, request, complaint, or demand, whether  
formal or informal, whether written or oral and whether transmitted or conveyed by mail, delivery,  
telephone, telex or otherwise which affect or seek to affect in any way the debtor or property or  
proceeds in which the debtor may claim an interest.


This Request for Notices and Papers shall not be deemed or construed to be a  
waiver of (A) Citibank, N.A.'s rights (i) to have final orders in non-core matters entered only after  
de novo review by a District Judge, (ii) to trial by jury in any proceeding so triable in this case or  
in any case, controversy or proceeding related to this case, and (iii) to have the District Court  
withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (B) any  
other rights, claims, actions, setoffs, or recoupments to which Citibank, N.A. is or may be entitled,

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in law or equity, all of which rights, claims, actions., setoffs or recoupments Citibank,. N.A.  
expressly reserves.

Dated: New York, New York  
April/7, 2001

Respectfully submitted,

By:   
\_\_\_\_\_  
Douglas P. Bartner  
Andrew Tenzer  
SHEARMAN & STERLING  
599 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 848-8000  
Facsimile: (212) 848-7179

COUNSEL FOR CITIBANK, N.A.

1 DOUGLAS P. BARTNER  
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599 Lexington Avenue  
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5 Counsel for Citibank, N.A.

6  
7 UNITED STATES BANKRUPTCY COURT  
8 NORTHERN DISTRICT OF CALIFORNIA  
9

10 In re ) Jointly Administered  
PACIFIC GAS & ELECTRIC COMPANY, ) Case No.: 01-39023  
11 ) Chapter 11  
Debtor. )  
12 ) AFFIDAVIT OF SERVICE  
13 )  
14 )

15 STATE OF NEW YORK )  
16 ) ss.:  
COUNTY OF NEW YORK )  
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18  
19 Marian D. Luketić, being duly sworn, deposes and says, under the penalty of  
20 perjury:

21  
22 1. I am over the age of eighteen years and employed by Shearman & Sterling,  
23 599 Lexington Ave, New York, New York, and I am not a party to the above-captioned  
24 proceedings.

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26 2. On April 18, 2001, I caused to be served by First Class Mail to the United  
27 States Trustee and Howard Rice Nemerovski Canady Falk & Rabkin, Attorneys for Debtors, at  
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their offices indicated on the attached service list, and all other parties having filed a Notice of Appearance, a true and correct copy of a "Notice of Appearance and Demand for Service of Papers".

  
Marian D. Luketic

Sworn to before me this  
18<sup>th</sup> day of April 2001

  
Notary Public

**WILLIAM C. ELLIS**  
**Notary Public, State Of New York**  
**No. 01EL6054623**  
**Qualified in New York County**  
**Commission Expires February 12, 2003**