

1 CHADBOURNE & PARKE LLP
30 Rockefeller Plaza
2 New York, New York 10112
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3 Howard Seife
4 Attorneys for El Dorado Hydro

5
6 UNITED STATES BANKRUPTCY COURT
7 NORTHERN DISTRICT OF CALIFORNIA
8 SAN FRANCISCO DIVISION
9

<p>10 In re</p> <p>11 PACIFIC GAS AND ELECTRIC COMPANY,</p> <p>12 a California corporation,</p> <p>13 Debtor.</p>	<p>Chapter 11</p> <p>Case No. 01-30923 (DM)</p>
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16 NOTICE OF APPEARANCE
17 TO THE CLERK, UNITED STATES BANKRUPTCY COURT:

18 PLEASE TAKE NOTICE that the undersigned law firm hereby
19 intervenes, pursuant to Rule 2018-1 of the Local Rules of the United
20 States Bankruptcy Court for Northern District of California, on
21 behalf of El Dorado Hydro ("El Dorado"), creditor and party-in-
22 interest, and, pursuant to Rules 2002, 9007 and 9010 of the Federal
23 Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and sections
24 102(1), 342 and 1109(b) of title 11 of the United States Code (the
25 "Bankruptcy Code"), requests that all notices given or required to
26 be given in this case and all papers served or required to be
27 served in this case be given to and served upon the following:
28

ADD

ADD: Pds Dgc Mail Center

1 Chadbourne & Parke LLP
2 30 Rockefeller Plaza
3 New York, New York 10112
4 (212) 408-5100
5 Attn: Joseph H. Smolinsky, Esq.;

6 and

7 El Dorado Hydro
8 1400 Fourth Avenue
9 Ford City, PA 16266
10 Attn: Robert Hanna

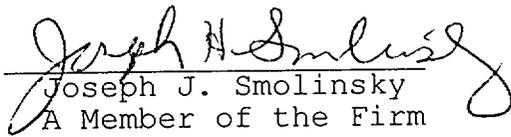
11 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Rules 2002,
12 9007 and 9010 of the Bankruptcy Rules, and sections 102(1), 342 and
13 1109(b) of the Bankruptcy Code, the foregoing demand includes not
14 only the notices and papers referred to in the Bankruptcy Rules or
15 the sections of the Bankruptcy Code specified above, but also
16 includes, without limitation, any and all orders, notices of any
17 hearing, application, motion, petition, pleading, request,
18 complaint, or demand, whether formal or informal, whether written or
19 oral and whether transmitted or conveyed by mail, courier service,
20 hand delivery, telephone, e-mail, facsimile transmission, telegraph,
21 telex, or otherwise, which affects or seeks to affect in any way any
22 rights or obligations of El Dorado.

23 **PLEASE TAKE FURTHER NOTICE** that El Dorado Hydro intends that
24 neither this Notice of Intervention nor any later appearance,
25 pleading, claim or suit shall waive (1) the right of El Dorado to
26 have final orders in noncore matters entered only after de novo
27 review by a District Judge; (2) the right of El Dorado to trial by
28 jury in any proceeding so triable in this case or any case,
controversy, or proceeding related to this case; (3) the right of El
Dorado to have the District Court withdraw the reference in any

1 matters subject to mandatory or discretionary withdrawal; or (4) any
2 other rights, claims, action, defenses, setoffs, or recoupments to
3 which El Dorado is or may be entitled under agreements, in law, in
4 equity, or otherwise, all of which rights, claims, actions,
5 defenses, setoffs and recoupments El Dorado expressly reserves.

6 Dated: New York, New York
April 27, 2001

7 **CHADBOURNE & PARKE LLP**

8
9 By: 
Joseph J. Smolinsky
A Member of the Firm

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11 30 Rockefeller Plaza
New York, New York 10112
12 (212) 408-5100

13 Attorneys for El Dorado Hydro
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