

1 CHADBOURNE & PARKE LLP
2 30 Rockefeller Plaza
3 New York, New York 10112
4 (212) 408-5100
5 Howard Seife

6 Attorneys for Rock Creek Limited Partnership

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

10 In re	Chapter 11
11 PACIFIC GAS AND ELECTRIC COMPANY,	Case No. 01-30923 (DM)
12 a California corporation,	
13 Debtor.	

14
15
16 NOTICE OF APPEARANCE

17 TO THE CLERK, UNITED STATES BANKRUPTCY COURT:

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

ADD

ADD: Rids Dgc Mail Center

1 required to be served in this case be given to and served upon the
2 following:

3 Chadbourne & Parke LLP
4 30 Rockefeller Plaza
5 New York, New York 10112
6 (212) 408-5100
7 Attn: Bruce J. Rader, Esq.;

8 and

9
10 Rock Creek Limited Partnership
11 335 Madison Avenue 28th Floor
12 New York, New York 10017
13 Attn: Daniel O'Shea, Esq.

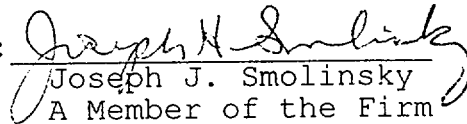
14
15 PLEASE TAKE FURTHER NOTICE that, pursuant to Rules 2002,
16 9007 and 9010 of the Bankruptcy Rules, and sections 102(1), 342 and
17 1109(b) of the Bankruptcy Code, the foregoing demand includes not
18 only the notices and papers referred to in the Bankruptcy Rules or
19 the sections of the Bankruptcy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

27
28 PLEASE TAKE FURTHER NOTICE that Rock Creek intends that
neither this Notice of Intervention nor any later appearance,
pleading, claim or suit shall waive (1) the right of Rock Creek to
have final orders in noncore matters entered only after de novo
review by a District Judge; (2) the right of Rock Creek to trial by
jury in any proceeding so triable in this case or any case,

1 matters subject to mandatory or discretionary withdrawal; or (4) any
2 other rights, claims, action, defenses, setoffs, or recoupments to
3 which Rock Creek 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 Rock Creek expressly reserves.

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

8 **CHADBOURNE & PARKE LLP**

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

12 30 Rockefeller Plaza
13 New York, New York 10112
14 (212) 408-5100

15 Attorneys for Rock Creek
16 Limited Partnership
17
18
19
20
21
22
23
24
25
26
27
28