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58-295/323

6 Attorney for Secured Creditor
7 BP AMOCO

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

11 In re

Case No. SF-01-30923-DM

12 PACIFIC GAS AND ELECTRIC
13 COMPANY, a California Corporation

Chapter 11

14 Debtor.

**REQUEST FOR SPECIAL NOTICE AND
SERVICE OF PAPERS**

15 Federal I.D. No. 94-0742640

16 TO THE CLERK OF THE BANKRUPTCY COURT AND TO ALL PARTIES IN INTEREST:

17 PLEASE TAKE NOTICE that the undersigned, on behalf of secured creditor, BP Amoco
18 hereby demands, pursuant to Bankruptcy Rule 2002 and Section 1109(b) of the Bankruptcy
19 Code, that all notices given or required to be given, and all papers served in this case be
20 delivered to and served upon as follows:

21 Robert C. Stokes
22 5851 San Felipe, Suite 950
23 Houston, TX 77057
24 Telephone: (713) 266-4190
25 Facsimile: (713) 266-4189

26 BP Amoco further requests that its attorneys be added to the Master Mailing List in this case.

27 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,
28 proof of claim, document, suit, motion nor any other writing or conduct, shall constitute a waiver
of BP Amoco's:

a. Right to have any and all final orders in any and all non-core matters entered only
after *de novo* review by a United States District Court Judge;

b. Right to trial by jury in any proceeding as to any and all matters so triable herein,

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1 whether or not the same be designated legal or private rights, or in any case, controversy or
2 proceeding related hereto, notwithstanding the designation *vel non* of such matters as “core
3 proceedings” pursuant to 28 U.S.C. §157(b)(2)(H), and whether such jury trial right is pursuant
4 to statute or the United States Constitution;

5 c. Right to have the reference of this matter withdrawn by the United States District
6 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

7 d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to
8 which BP Amoco is entitled under any agreements or at law or in equity or under the United
9 States Constitution.

10 All of the above rights are expressly reserved and preserved unto BP Amoco without
11 exception and with no purpose of confessing or conceding jurisdiction in any way by this
12 filing or by any other participation in these matters.

13 PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the
14 Bankruptcy Code and Rule 3017(a) of the Bankruptcy Rules, the foregoing demand includes not
15 only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also
16 includes, without limitation, all others and notices of order, applications, motions, memoranda,
17 declarations, disclosure statements, answering or reply papers, demands, complaints, petitions,
18 pleadings, requests, and other documents brought before this Court in this case, whether formal
19 or informal, written or oral, transmitted or conveyed by mail, delivery, telephone, telegraph,
20 telex, telecopy, personal delivery or any other means.

21 DATED: June 11, 2001

22
23 By: 
24 ROBERT C. STOKES
25 Attorney for Secured Creditor
26 BP AMOCO
27
28

COPY

1 WILLIAM H. KIEKHOFER (State Bar No. 94022)
2 YALE K. KIM (State Bar No. 188895)
3 STEVEN E. RICH (State Bar No. 198412)
4 KELLEY DRYE & WARREN LLP
5 777 South Figueroa Street, Suite 2700
6 Los Angeles, California 90017
7 Telephone: (213) 689-1300
8 Facsimile: (213) 688-8150
9 Attorneys for Secured Creditor
10 BP ENERGY COMPANY

FILED
01 MAY 10 AM 10:00
KEENAN G. CASADY, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DIST. OF CA.
SAN FRANCISCO, CA.

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

12 In re:
13 PACIFIC GAS AND ELECTRIC COMPANY,
14 a California corporation,
15 Debtor.

Case No. SF-01-30923-DM
Chapter 11

~~(Proposed)~~
ORDER GRANTING APPLICATION FOR
ADMISSION OF ROBERT STOKES
PRO HAC VICE

[No Hearing Required]

18 Robert Stokes, an active member in good standing of the bar of the United States District
19 Court for the Southern District of Texas, having applied in the above-entitled action for
20 admission to practice in the Northern District of California on a *pro hac vice* basis, representing
21 BP Amoco,

22 IT IS HEREBY ORDERED THAT the application motion is granted, subject to the terms
23 and conditions of ~~General Order No. 49~~ ^{B.L.R. 1001-2(a)(29)}. All papers filed by the attorney shall indicate
24 appearance *pro hac vice*. Service of papers upon and communication with co-counsel designated
25 in the application shall constitute notice to the party.

27 DATED: MAY 10 2001

DENNIS MONTALI
HONORABLE DENNIS MONTALI
UNITED STATES BANKRUPTCY JUDGE