

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

50-275/323

In re:) Case No. 01-30923 SFM
)
PACIFIC GAS AND ELECTRIC) Judge Dennis Montali
COMPANY, a California Corporation)
) Chapter 11
Debtor.)
) NOTICE OF APPEARANCE, REQUEST
) FOR SERVICE OF PAPERS AND
) RESERVATION OF RIGHTS

PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for UNITED SERVICES AUTOMOBILE ASSOCIATION ("USAA"), a creditor and party-in-interest in the above referenced case, and pursuant to *inter alia*, Federal Rules of Bankruptcy Procedure 2002, 9007, and 9010 and Section 1109(b) of the Bankruptcy Code, requests that the following name be added to any service list in this case and that all notices given or required to be given in this case and all papers served or required to be served in this case, be given to and served upon:

Michael P. Shuster, Esq.
Lawrence E. Oscar, Esq.
Hahn Loeser & Parks LLP
3300 BP Tower
200 Public Square
Cleveland, OH 44114-2301
Tel: (216) 621-0150
Fax: (216) 241-2824

PLEASE TAKE FURTHER NOTICE that this request includes not only notices and papers referred to in the Bankruptcy Rules 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, courier service, hand-delivery, telephone, facsimile transmission, telegraph, telex, or otherwise (1) that affects or seeks to affect in any way any rights or interest of any creditor or party-in-interest in

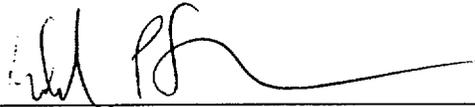
Appl of, Add: Kids Ogc Mail Center

this case, including USAA, with respect to: (a) the Debtor; (b) property of the estate, or proceeds thereof, in which the Debtor may claim an interest; or (c) property or proceeds thereof in the possession, custody, or control of others that the Debtor may seek to use; or (2) that requires or seeks to require any act, delivery or any property, payment, or other conduct by USAA.

PLEASE TAKE FURTHER NOTICE that USAA intends that neither this Notice of Appearance, Request for Service of Papers and Reservation of Rights nor any later appearance, pledge, claim or suit shall waive (1) its right to have final orders in non-core matters entered only after *de novo* review by a District Judge; (2) its right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding relating to this case; (3) its right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, setoffs, or recoupments to which it is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

July 20, 2001

Respectfully submitted,

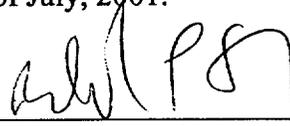


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Attorneys for United Services Automobile
Association

CERTIFICATE OF SERVICE

A copy of the foregoing Notice of Appearance, Request for Service of Papers and Reservation of Rights has been served upon the parties on the Special Notice List as of July 16, 2001 by regular U.S. mail, postage prepaid, this 20th day of July, 2001.

A handwritten signature in black ink, appearing to be 'A. W. P. S.', written over a horizontal line.

One of the Attorneys for United Services Automobile Association