

50-295/1323

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Attorneys for
UNITED SERVICES AUTOMOBILE ASSOCIATION

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

In re

PACIFIC GAS & ELECTRIC COMPANY,

Debtor.

CASE NO. 01-30923 DM

Chapter 11 Case

THE HONORABLE DENNIS MONTALI

Date: September 11, 2001

Time: 1:30 p.m.

Place: 235 Pine Street, 22nd Floor

Evidentiary Hearing Requested

UNITED SERVICES AUTOMOBILE ASSOCIATION'S NOTICE OF MOTION AND
MOTION PERMITTING MODIFICATION OR LIFTING OF THE AUTOMATIC STAY
PURSUANT TO 11 U.S.C. SECTION 362(d)(1)

PLEASE TAKE NOTICE that on September 11, 2001 at 1:30 p.m. or as soon
thereafter as the matter may be heard in the Courtroom of the Honorable Dennis Montali, located at

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Add: Add: Kids Dge Mail Center

1 235 Pine Street, 22nd Floor, San Francisco, California, attorneys for United Services Automobile
2 Association will and hereby does move, pursuant to Section 362(d)(1) of the Title 11 of the United
3 States Code, and Rule 2002, 4001, of the Federal Rules of Bankruptcy Procedure and B.L.R. 4001-1,
4 for entry of an order relief from the automatic stay pursuant to Sections 362(d)(1) of the Bankruptcy
5 Code (the "Motion") on grounds that: (1) equitable considerations weigh heavily in favor of USAA
6 and PG&E bears responsibility for creating the problems, which are the subject of the non-
7 bankruptcy litigation, and (2) since this matter involves solely issues of state law, it is in the interests
8 of judicial economy, restraint and deference to allow it to proceed in State court.

9 This Motion is based on this Notice of Motion and Motion, the Memorandum of
10 Points and Authorities, the Declaration of Randy W. Gimple, the records and files of this case and
11 any admissible evidence presented to this Court in connection with the hearing on this Motion.

12 Any party that does not receive notice of this Motion and the underling pleadings may
13 contact Randy W. Gimple at Carlson, Calladine & Peterson LLP, Two Embarcadero Center, Suite
14 1800, San Francisco, California 94111, (415) 391-3911, or rgimple@ccplaw.com to receive (i) a
15 copy of the motions and accompanying declarations without exhibits via facsimile or email, or (ii) a
16 copy of the motions and accompanying declarations with exhibits via UPS overnight delivery (at the
17 cost of the requesting party) or via U.S. mail (at no cost.)

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1 Dated: August 2, 2001

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By: 

RANDY W. GIMPLE

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ASSOCIATION