

50-275/323

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14 Co-Counsel to MBIA Insurance Corporation

15 UNITED STATES BANKRUPTCY COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 In re:

19 PACIFIC GAS AND ELECTRIC
20 COMPANY, a California corporation
21 Debtor.

22 Case No. 01-30923
23 Chapter 11 Case

24 **AMENDED NOTICE OF APPEARANCE AND**
25 **REQUEST FOR SERVICE OF ALL NOTICES AND PAPERS**

PLEASE TAKE NOTICE that, pursuant to Bankruptcy Rule 9010(b), King & Spalding, and Buchalter, Nemer, Fields & Younger hereby enter appearances on behalf of MBIA INSURANCE CORPORATION, which is creditor and party-in-interest in the above-captioned bankruptcy case, and respectfully request that all notices that are required to be given in this case and all papers that are required to be served in this case pursuant to rules 2002, 3017(a) and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "*Bankruptcy Rules*"), or any other

A001 Add: Kids Ogc Mail Center

1 Bankruptcy Rules, local rules or provisions of title 11 of the United States Code (the
2 "*Bankruptcy Code*"), be given to and served upon the following parties at the addresses
3 indicated below:
4

5 KING & SPALDING
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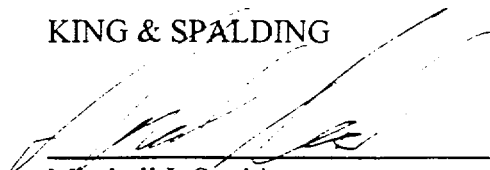
12 MBIA INSURANCE CORPORATION
13 Beth Smayda, Director
14 113 King Street
15 Armonk, New York 10504
16 Telephone: (914) 273-4545
17 Facsimile: (914) 765-3660
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1 **PLEASE TAKE FURTHER NOTICE** that, pursuant to §1109(b) of the
2 Bankruptcy Code, the foregoing request supersedes all prior requests for notices made on behalf
3 of MBIA Insurance Corporation, and includes not only notices and papers referred to in the
4 Bankruptcy Rules specified above, but also includes, without limitation, notices of any
5 application, order, complain, demand, hearing, motion, petition, pleading or request, whether
6 formal or informal, whether written or oral, and whether transmitted or conveyed by mail
7 delivery, telephone, telegraph, telex, or otherwise that (1) affects or seeks to affect in any way
8 any rights or interests of any creditor or party in interests in this case, with respect to the (a)
9 debtor, (b) property of the debtor's estate, or proceeds thereof, in which the debtor may claim an
10 interest, or (c) property or proceeds thereof in the possession, custody, or control of others that
11 the debtor may seek to use; or (2) requires or seeks to require any act, delivery or any property,
12 payment or other conduct.

13 **PLEASE TAKE FURTHER NOTICE** that **MBIA INSURANCE**
14 **CORPORATION** intends that neither this Notice of Appearance nor any later appearance,
15 pleading, claim or suit shall waive: (1) its right to trial by jury in any proceeding so triable in
16 this case or any case, controversy, or proceeding related to this case; or (2) any other rights,
17 claims, actions, defenses, set-offs, or recoupments to which it is or may be entitled under
18 agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, set-offs,
19 and recoupments are expressly reserved.
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Dated: New York, New York
August 1, 2001

KING & SPALDING



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Lawrence A. Larose
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New York, New York 10036
(212) 556-2100

- and -

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333 Market Street
San Francisco, California 94105
(415) 227-0900

Co-Counsel to: MBIA Insurance Corporation

CERTIFICATE OF SERVICE

I am employed in the County of New York, State of New York. I am over the age of 18 and not a party to the within action. My business address is 1185 Avenue of the Americas, New York, New York 10036.


On August 1, 2001, I served the foregoing document described as **AMENDED NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF ALL NOTICES AND PAPERS** on each interested party, as stated on the attached service list.

- (BY MAIL) I placed a true and correct copy of the foregoing documents in a sealed envelope addressed to each interested party, as stated on the attached service list. I placed each such envelope, with postage thereon fully prepaid, for collection and mailing at King & Spalding, New York, New York. I am readily familiar with King & Spalding's practice for collection and processing of correspondence for mailing with the United States Postal Service. Under that practice, the correspondence would be deposited in the United States Postal Service on that same day in the ordinary course of business.

Executed on August 1, 2001, at New York, New York.

I declare under penalty of perjury that the foregoing is true and correct.

Rishona Fleishman
(Type or print name)


(Signature)