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50-275/923

August 10, 2001

Clerk of the Court
United States Bankruptcy Court
Northern District of California
San Francisco Division
P.O. Box 7341
San Francisco, CA 94120-7341

Re: Pacific Gas and Electric Company,
a California Corporation
Case No.: 01-30923 DM

Dear Sir or Madam:

Enclosed please find an original Notice of Appearance for filing in the above-referenced matter. Please date stamp or otherwise indicated your receipt of the Notice on the enclosed copy of the Notice and return the same to me in the envelope provided.

Thank you.

Very truly yours,

cc: See attached service list

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

-----X
In re: :
 :
 : Case No. 01-30923 DM
PACIFIC GAS AND ELECTRIC COMPANY, :
a California Corporation, :
 :
Debtor. :
-----X

**NOTICE OF APPEARANCE, DEMAND FOR
SERVICE OF PAPERS AND RESERVATION OF RIGHTS**

PLEASE TAKE NOTICE that Jeffrey D. Chansler, Esq. appears as counsel on behalf of Empire Blue Cross and Blue Shield ("Empire"), a creditor and party in interest in the above-captioned case, and demands, pursuant to 11 U.S.C. §§ 342 and 1109(b) and Rules 2002, 3017 and 9007 of the Federal Rules of Bankruptcy Procedure, that copies of all papers arising in the Debtor's case or in any related adversary proceedings be served on the individuals at the address set forth below:

Jeffrey D. Chansler, Esq.
Empire Blue Cross Blue Shield
One World Trade Center, 28th Floor
New York, New York 10048
Attention: Louis L. Benza, Esq.

PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b), the foregoing demand includes not only the notices and papers referred to or specified above but also includes, without limitation, orders and notices of any application, complaint, demand, motion, petition, plan, disclosure statement, pleading or request, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone,

telegraph, telex or otherwise filed or made which affect or seek to affect in any way rights or interests of creditors, parties in interest, Empire, the Debtor or the property of the Debtor.

PLEASE TAKE FURTHER NOTICE that Empire intends that neither this Notice of Appearance nor any later appearance, pleading, claim, or suit shall waive (1) Empire's right to have final orders in noncore matters entered only after de novo review by a District Judge, (2) Empire's right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) Empire's 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, defenses, setoffs, or recoupments to which Empire is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments Empire expressly reserves.

Dated: New York, New York
August 10, 2001

JEFFREY D. CHANSLER, ESQ.
Attorney for Empire Blue Cross Blue Shield

By: 

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