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13 PACIFIC GAS AND ELECTRIC COMPANY

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

17 In re
18 PACIFIC GAS AND ELECTRIC
19 COMPANY, a California corporation,
20 Debtor.
21 Federal I.D. No. 94-0742640

Case No. 01 30923 DM

Chapter 11 Case

Date: December 27, 2001
Time: 1:30 p.m.
Place: 235 Pine Street, 22nd Floor
San Francisco, California
Judge: Hon. Dennis Montali

22 REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PG&E'S MOTION (1)
23 AUTHORIZING DEBTOR TO FILE CERTAIN PRELIMINARY OMNIBUS
24 OBJECTIONS TO CLAIMS WITHOUT PREJUDICE TO RIGHT TO FILE
25 SUBSEQUENT OBJECTIONS THERETO AND (2) WAIVING COMPLIANCE WITH
26 FEDERAL RULES OF CIVIL PROCEDURE 26(a) AND (f) IN CERTAIN CLAIMS
27 OBJECTION PROCEEDINGS

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1 In accordance with Federal Rule of Evidence 201, Pacific Gas and Electric
2 Company, the debtor and debtor in possession herein ("PG&E") respectfully requests that
3 this Court, in its consideration of PG&E's Motion (1) Authorizing Debtor To File Certain
4 Preliminary Omnibus Objections To Claims Without Prejudice To Right To File Subsequent
5 Objections Thereto and (2) Waiving Compliance With Federal Rules Of Civil Procedure
6 26(a) and (f) In Certain Claims Objection Proceedings filed herewith, take judicial notice of
7 the information contained in the exhibits attached hereto.¹

8 1. Exhibit 1 is a true and correct copy of the Pacific Gas & Electric
9 Company's Omnibus Objections to Chromium Claims filed on November 14, 2001 by
10 PG&E with this Court. See Mullis v. United States Bankruptcy Court, 828 F.2d 1385, 1388
11 n.9 (9th Cir. 1987) (taking notice of same).

12 2. Exhibit 2 is a true and correct copy of the Notice of Objection and
13 Objection to Claims of Baldwin Associates, Inc. filed on November 8, 2001 by PG&E with
14 this Court. See Mullis, 828 F.2d at 1388.

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HOWARD
RICE
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CANADY
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& RABKIN
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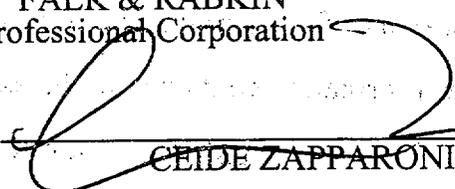
¹Pursuant to the Court's Case Management Order (revised April 25, 2001) at 4:2-6, copies of these exhibits are not attached to the service copies of this Request for Judicial Notice. Instead, copies of the exhibits are available and may be obtained by written request to rlopez@hrice.com or by sending a facsimile to Racquel N. Lopez at 415/217-5910. Copies of the exhibits will be mailed to you.

1 For the foregoing reasons, PG&E respectfully requests that the Court take judicial
2 notice of each of the Exhibits accompanying this Request for Judicial Notice.

3
4 DATED: December 7, 2001.

5 Respectfully,

6 HOWARD, RICE, NEMEROVSKI, CANADY,
7 FALK & RABKIN
8 A Professional Corporation

9 By: 

CEIDE ZAPPARONI

10 Attorneys for Debtor and Debtor in Possession
11 PACIFIC GAS AND ELECTRIC COMPANY

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