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 6 Counsel to Creditor
 HALCYON PARTNERS

7
 8 UNITED STATES BANKRUPTCY COURT
 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 In re:

11 PACIFIC GAS & ELECTRIC CO.,
 12 Debtor

No. 01-30923-DM

CHAPTER 11

NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL
NOTICE

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 17 TO THE HONORABLE DENNIS MONTALI, UNITED STATES
 18 BANKRUPTCY JUDGE, THE CLERK OF THE COURT, THE DEBTOR, THE
 19 UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES ENTITLED
 20 TO NOTICE:

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 22 PLEASE TAKE NOTICE that HALCYON PARTNERS ("Halcyon"),
 23 hereby requests that all notices of all events relevant to the above-captioned
 24 bankruptcy case, including without limitation adversary proceedings and
 25 contested matters therein ("Bankruptcy Case"), and any and all copies of all
 26 pleadings or documents filed in relation to the above-referenced Bankruptcy
 27 Case, including all pleadings or notices required to be served on any party under
 28

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NOTICE OF APPEARANCE AND
 REQUEST FOR SPECIAL NOTICE

ADD: Rds Dgc mail center
 Rec'd 01/18/02

1 Rule 2002 of the Federal Rules of Bankruptcy Procedure, be served on Halcyon
2 as follows:

3 Pillsbury Winthrop LLP
4 650 Town Center Drive, 7th Floor
5 Costa Mesa, CA 92626-7122
6 Attn: Mark D. Houle, Esq.
7 Phone: (714) 436-6800
8 Fax: (714) 436-2800

9 In addition, (1) Halcyon requests under Federal Rule of Bankruptcy
10 Procedure 3017 that it receive service of copies of any disclosure statement or
11 plan for which a party seeks approval and (2) that its attorneys be included on
12 the Master Mailing List in this case.

13 Neither this Notice of Appearance and Request for Notice nor any
14 subsequent appearance, pleading, claim, proof of claim, document, suit, motion
15 nor any other writing or conduct, shall constitute a waiver of Halcyon's:

- 16 a. Right to have any and all final orders in any and all non-core
17 matters entered only after de novo review by a United States
18 District Court Judge;
- 19 b. right to trial by jury in any proceeding as to any and all matters so
20 triable herein, whether or not the same be designated legal or
21 private rights, or in any case, controversy or proceeding related
22 hereto, notwithstanding the designation vel non of such matters as
23 "core proceedings" pursuant to 28 U.S.C. Section 157(b)(2)(H), and
24 whether such jury trial right is pursuant to statute or the United
25 States Constitution;
- 26 c. right to have the reference of this matter withdrawn by the United
27 States District Court in any matter or proceeding subject to
28 mandatory or discretionary withdrawal; and

1 d. other rights, claims, actions, defenses, setoffs, recoupments or other
2 matters to which this party is entitled under any agreements or at
3 law or in equity or under the United States Constitution.

4 All of the above rights are expressly reserved and preserved unto Halcyon
5 without exception and with no purpose of confessing or conceding jurisdiction in
6 any way by this filing or by any other participation in these matters.

7 Dated: December 21, 2001

8 MARK D. HOULE
9 PILLSBURY WINTHROP LLP
650 Town Center Drive, 7th Floor
10 Costa Mesa, CA 92626-7122

11
12 By 
13 Mark D. Houle
14 Attorneys for Creditor HALCYON
PARTNERS

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