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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

In re PACIFIC GAS AND ELECTRIC COMPANY, a California corporation, Debtor, Federal I.D. No. 94-0742640	Bankruptcy Case No. 01-30923 SFM11-Chapter 11 [Assigned to: Judge Dennis Montali] KDG-1 **DECLARATION OF MICHAEL P. DOLAN IN SUPPORT OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY** PRELIMINARY HEARING: DATE: January 3, 2002 TIME: 1:30 a.m.. PLACE: 235 Pine Street, 22nd Floor San Francisco, CA

I, Michael P. Dolan, hereby state the following:

1. I am an attorney licensed to practice law in all courts of the State of California. I am one of the attorneys of record for about 232 individuals who have pending lawsuits and claims against Pacific Gas & Electric Company, the Debtor in the above-entitled Chapter 11 proceeding ("Debtor"), arising out of their exposure to Chromium 6 (the Chromium Claimants"). I have personal knowledge of the claims being asserted by the Chromium Claimants in that I have been actively involved in prosecuting the actions brought on their behalf in the Los

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Angeles Superior Court. Therefore, I have personal knowledge of the information set forth below and could and would testify thereto if called as a witness. I am submitting this Declaration in Support of the Motion for Relief From Automatic Stay filed by the Chromium Claimants.

2. The Law Offices of Thomas Anton & Associates and I have filed three lawsuits against Debtor on behalf of the Chromium Claimants. 222 of these individuals seek damages for personal injuries and fraud and ten of these claims are for wrongful death caused by exposure to Chromium 6. Each of these claimants has timely filed a proof of claim in Debtor's Chapter 11 case.

3. The lead case that I have brought is Adams v. Pacific Gas & Electric Company, et. al., BC 233962; the two other cases are Alderson v. PG&E, BC 248532 and Kearney v. PG&E, BC 262031. The defendants in the Alderson, Adams, and Kearney cases are Pacific Gas & Electric Company ("Debtor") and BetzDearborn, Inc. ("Betz"). A true and correct copy of the Second Amended Complaint in the Adams matter is attached hereto as Exhibit "A".[1] This Complaint is illustrataive of the claims brought in all three cases by the Chromium Claimants.

4. Both the Adams case and the Alderson case have been assigned to Judge Mohr of the Los Angeles-Central District Civil West complex litigation division. The Adams case was filed in July of 2000 and the Alderson case shortly thereafter. Kearney was just recently filed and, while the claims are substantially the same as the claims asserted by the Plaintiffs in Adams and Alderson, the majority of Plaintiffs in the Kearney case are minors. Judge Mohr has placed a hold on the Alderson case, while Adams has gone forward. Currently in the Adams case, the Plaintiffs have until January 17, 2002, to file their Third Amended Complaint. Plaintiffs in this action have received approximately 3,500,000 pages of documents that have been produced by Debtor's co-defendant, Betz.

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[1]The complaint is voluminous. Pursuant to the Court's Case Management Order, a copy of the Complaint is not provided, but is available upon request and will be available on the Court's website.

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5. Since the commencement of Debtor's Chapter 11 case, Plaintiffs have continued with discovery against defendant Betz and have copied over 60,000 pages of documents. Most of the documents were produced in other litigation alleging exposure to Chromium 6. Plaintiffs estimate that their review of documents produced by defendant Betz will be completed by the end of January 2002. Plaintiffs have been served with requests for production, requests for admissions, and interrogatories by Betz. Plaintiffs in the Adams case have filled out questionnaires for Betz that are approximately 50 pages and go into great detail regarding the claims of Plaintiffs. These questionnaires were used in previous litigation involving claims of exposure to Chromium 6 in which Debtor was a defendant.

6. Plaintiffs' attorneys have spent thousands of hours working on the Adams case in preparation of proceeding to trial in the near future. Plaintiffs have retained experts located in Los Angeles who have agreed to aid in the case. The majority of all witnesses for Plaintiffs are from Southern California. Defendant Betz has its California offices in Los Angeles. Moreover, the injuries suffered by the Plaintiffs occurred in Southern California. Several of the Plaintiffs have died during the pendency of their cases. Finally, at least ten cases similar to the present case have been filed and/or litigated in the Los Angeles courts, including the cases that are referenced in the Motion for Abstention.

7. There have been several status conferences held by Judge Mohr, who has indicated at these status conferences that he would like the stay lifted against Debtor so that Debtor could be joined in the litigation, which involve substantially the same issues as the litigation being pursued against Betz. In addition, notwithstanding its bankruptcy petition, Debtor has had counsel present to observe the proceedings at all of the hearings that have taken place since the commencement of its Chapter 11 case.

8. At the present time, Plaintiffs will be ready for trial of test cases in Adams no later than the Summer of 2002. It is unlikely this would be the case should the matter be transferred to federal court. PG&E has been litigating these type of claims since 1993, and is well aware of the evidence and issues involved. Defendant Betz has been litigating these types of claims since 1994 and is also well aware of the issues and the evidence involved in these matters.

9. I have reviewed all of the public records regarding cases filed against PG&E for injuries sustained as a result of exposure to chromium 6 and have reviewed millions of pages of documents produced by Betz in the Adams case BC 233964. Additionally, I have spoken with several experts who have agreed to act on Plaintiffs' behalf for the purposes of testifying as experts. All of Plaintiffs' experts are from Southern California.

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I declare under penalty of perjury that the foregoing is true and correct under the laws of the United States of America and of California.

Executed this 19th day of December, 2001, at Bakersfield, California

Michael P. Dolan

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