| 2                                   | SHERI M. SCHWARTZ (State Bar No. 17933<br>ROBERT C. SHENFELD, ESQ. 1<br>KELLEY DRYE & WARREN LLP<br>777 South Figueroa Street, Suite 2700<br>Los Angeles, California 90017<br>Telephone: (213) 689-1300<br>Facsimile: (213) 688-8150 | BERT C. SHENFELD, ESQ. LEY DRYE & WARREN LLP South Figueroa Street, Suite 2700 Angeles, California 90017 phone: (213) 689-1300 simile: (213) 688-8150 |  |
|-------------------------------------|--|---|--|
| 5                                   | Attorneys for DEUTSCHE BANK TRUST COMPANY AMERICAS  50-275 323   |   |  |
| 7                                   | UNITED STATES BANKRUPTCY COURT   |   |  |
| 8                                   | NORTHERN DISTRICT OF CALIFORNIA  |   |  |
| 9                                   | SAN FRANCISCO DIVISION   |   |  |
| 10                                  | SAN FRANCISCO DIVISION   |   |  |
| 11                                  |  |   |  |
| 12                                  | In re  | Case No.: 01-30923 DM   |  |
| 13                                  | PACIFIC GAS AND ELECTRIC   | Chapter 11  |  |
| 14                                  | COMPANY, a California corporation,   | NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE   |  |
| 15                                  | Debtor.  | [No Hearing Required]   |  |
| 16                                  |  |   |  |
| 17                                  |  |   |  |
| 18                                  | TO THE CLERK OF THE BANKRUPTCY COURT AND TO ALL PARTIES IN INTEREST:   |   |  |
| 19                                  | PLEASE TAKE NOTICE that Deutsche Bank Trust Company Americas   |   |  |
| 20                                  | ("Deutsche") by and through their counsel, Kelley Drye & Warren LLP, hereby files its notice of  |   |  |
| 21                                  | appearance pursuant to Bankruptcy Rule 9010(b), and hereby requests, pursuant to 11 U.S.C. §   |   |  |
| 22                                  | 1109(b) and Bankruptcy Rules 2002, 3017 and 9007, that all notices given or required to be   |   |  |
| 23                                  | given, and all papers served in this case, in any other related matter, or in adversary proceeding(s)  |   |  |
| 24                                  | the undersigned representatives of Deutsche as   |   |  |
| 25                                  | follows:   |   |  |
| 26                                  |  |   |  |
| 27                                  |  |   |  |
| 28                                  | Application to appear <i>pro hac vice</i> pending.   |   |  |
| YE &<br>LLP<br>ASTRIFT<br>1017-5425 | LA01/SHENR/211372.2  | NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE   |  |
|                                     | <del></del>  |   |  |

Robert C. Shenfeld, Esq. Kelley Dryc & Warren LLP 777 South Figueroa Street Suite 2700 Los Angeles, CA 90017-5825 Telephone: (213) 689-1300 Facsimile: (213) 688-8150

Neither this Notice of Appearance and Request for Special Notice nor any subsequent appearance, pleading, claim, proof of claim, document, suit, motion nor any other writing or conduct, shall constitute a waiver by Deutsche of any:

- (a) right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge;
- (b) right to trial by jury in any proceeding as to any and all matters so triable therein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, whether or not such jury trial right is pursuant to statute or the United States Constitution;
- (c) right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; or
- (d) other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements or at law or in equity or under the United States Constitution.

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

PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code and Rules 2002 and 3017(a) of the Bankruptcy Rules, the foregoing demand includes not only the notices and papers referred to in the above-mentioned Bankruptcy Code and Rules, but also includes, without limitation, all orders and notices of orders, applications, motions, memoranda, declarations, disclosure statements, answering or reply papers, petitions,

28
KELLEY DRYE &
WARREN LLP
777 South Fronting Street
5077 200
LOS ANGRUS, CA 9007-5825

5

6

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26 27

LA01/SHENR/211372.2

-2-

NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE

Agg oec Way Center

pleadings, requests, complaints or demands, whether formal or informal, written or oral, or whether transmitted or conveyed by mail delivery, telephone, telegraph, telex, telecopy, personal delivery or otherwise, which are served or otherwise affect the Debtor or its property, Deutsche, this case or any other adversary proceeding related thereto. Dated: May 4, 2002 KELLEY DRYE & WARREN LLP SHERI M. SCHWARTZ SHERI M. SCHWARTZ, ESO. Attorneys for DEUTSCHE BANK TRUST COMPANY AMERICAS LA01/SHENR/211372.2

NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE