

1 JEFFREY L. SCHAFFER (No. 91404)  
2 ETHAN P. SCHULMAN (No. 112466)  
3 DEBORAH A. KANE (No. 184326)  
4 HOWARD, RICE, NEMEROVSKI, CANADY,  
5 FALK & RABKIN  
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11 Attorneys for Debtor and Debtor in Possession  
12 PACIFIC GAS & ELECTRIC COMPANY

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

16 In re

17 PACIFIC GAS and ELECTRIC  
18 COMPANY, a California corporation,

19 Debtor.

20 Case No. 01-30923 DM

21 Chapter 11 Case

22 DECLARATION OF DEBORAH S.  
23 SHEFLER IN SUPPORT OF DEBTORS  
24 MOTION FOR VALUATION OF CLAIM  
25 FOR FEASIBILITY PURPOSES  
26 (DEANNE CANNON, CLAIM NO. 4898)

27 Date: October 2, 2002  
28 Time: 1:30 p.m.  
Place: 235 Pine Street, 22nd Floor  
San Francisco, California  
Judge: Hon. Dennis Montali

Federal I.D. No. 94-0742640

HOWARD  
RICE  
NEMEROVSKI  
CANADY  
FALK  
& RABKIN  
A Professional Corporation

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1 I, Deborah S. Shefler, hereby declare:

2 1. I am an attorney licensed to practice before this Court. I am employed by  
3 Pacific Gas & Electric Company ("PG&E") in its law department. I am one of the attorneys  
4 representing PG&E with respect to Deanne Cannon v. Pacific Gas & Electric Company, San  
5 Francisco Superior Court Case No. 402362 (the "Cannon Action"). The documents attached  
6 as exhibits to this declaration are maintained in the normal course of business by PG&E. I  
7 have personal knowledge of the matters set forth in this declaration and if called upon to  
8 testify thereto I could and would competently do so.

9 2. Attached as Exhibit A is a true and correct copy of Proof of Claim number  
10 4898 (the "Claim"), filed by Deanne Cannon ("Cannon") on or about August 22, 2001.

11 3. Attached as Exhibit B is a true and correct copy of the partial Charge of  
12 Discrimination (the "Charge") filed by Cannon with the California Department of Fair  
13 Employment and Housing on or about October 20, 2000, which Cannon submitted as  
14 support for the Claim.

15 4. Attached as Exhibit C is a true and correct copy of the Charge.

16 5. Attached as Exhibit D is a true and correct copy of the Complaint filed by  
17 Cannon in the Cannon Action, on or about December 11, 2001.

18 6. Attached as Exhibit E is a true and correct copy of PG&E's response to the  
19 Charge, dated March 7, 2001, prepared by Patricia Freeman, PG&E Equal Employment  
20 Opportunity Consultant.

21 7. Attached as Exhibit F is a true and correct copy of an Attending Physician  
22 Statement dated December 13, 1999, from Dr. Laurence Alavezos, certifying that Cannon  
23 was unable to work.

24 8. Attached as Exhibit G is a true and correct copy of an Attending Physician  
25 Statement dated September 28, 2000, from Dr. Laurence Alavezos, certifying that Cannon  
26 was able to return to work without restrictions or job modifications.

27 9. Attached as Exhibit H is a true and correct copy of a Memorandum of  
28 Disposition — North Coast Grievance, resolving Cannon's grievance over PG&E's bypass

1 of her bid for a meter reader position, which became open in May 2000.

2 10. Attached as Exhibit I is a true and correct copy of a Letter Agreement dated  
3 May 4, 2001, between PG&E and the International Brotherhood of Electrical Workers,  
4 Local 1245 (Cannon's union), certifying that PG&E will return Cannon to work in a meter  
5 reader position.

6 I declare under penalty of perjury under the laws of the State of California that  
7 the statements in this declaration are true and correct. Executed on this 27 day of August, at  
8 San Francisco, California.

9  
10 By:   
11 DEBORAH S. SHEFLER

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13 HOWARD  
14 RICE  
15 NEMEROVSKI  
16 CANADY  
17 FALK  
18 & RABKIN  
19 A Professional Corporation

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Exhibits are not attached to the service copies of this document. You may obtain copies of the Exhibits in one of the following ways: through the "Pacific Gas & Electric Company Chapter 11 Case" link accessible through the Bankruptcy Court's website ([www.canb.uscourts.gov](http://www.canb.uscourts.gov)), or by written request to Howard, Rice, Nemerovski, Canady, Falk & Rabkin, Attn: Nathaniel H. Hunt, Three Embarcadero Center, 7th Floor, San Francisco, California 94111-4024.