

1 JEFFREY L. SCHAFFER (No. 91404)
2 ETHAN P. SCHULMAN (No. 112466)
3 LINDA Q. FOY (No. 148764)
4 HOWARD, RICE, NEMEROVSKI, CANADY,
5 FALK & RABKIN
6 A Professional Corporation
7 Three Embarcadero Center, 7th Floor
8 San Francisco, California 94111-4065
9 Telephone: 415/434-1600
10 Facsimile: 415/217-5910

50-275
323

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 MAUREEN L.
23 FRIES IN SUPPORT OF DEBTOR'S
24 VALUATION OF CLAIM FOR
25 FEASIBILITY PURPOSES (GILBER
26 MEDEIROS CLAIM NO. 7057)

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

Addogee mail center
A001

1 I, Maureen L. Fries, 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 in-house counsel office. I am one of the
4 attorneys representing PG&E with respect to Medeiros v. Pacific Gas and Electric Company,
5 United States District Court for the Eastern District of California, Case No. Civ.-S-00-1042
6 LKK DAD PS (the "Medeiros Action"). The documents attached as exhibits to this
7 declaration are maintained in the normal course of business by PG&E. I have personal
8 knowledge of the matters set forth in this declaration and if called upon to testify thereto I
9 could and would competently do so.

10 2. Attached as Exhibit 1 to this declaration is a true and correct copy of the
11 Proof of Claim Filed by Mr. Medeiros in Pacific Gas and Electric Company's Bankruptcy
12 Proceeding.

13 3. Attached as Exhibit 2 to this declaration is a true and correct copy of the
14 Memorandum of Points a Authorities in Support of Defendants' Motion for Summary
15 Judgment in Medeiros v. PG&E, et al., Case No. Civ-S-00-1042 LKK DAD PS in the
16 United States District Court, Eastern District of California (Sacramento).

17 4. Attached as Exhibit 3 to this declaration is a true and correct copy of the
18 Separate Statement of Undisputed Facts in Support of Defendants' Motion for Summary
19 Judgment in Medeiros v. PG&E, et al., United States District Court, Eastern District of
20 California, Case No. Civ-S-00-1042 LKK DAD PS.

21 5. Attached as Exhibit 4 to this Declaration is a true and correct copy of the
22 Declaration of Maureen L. Fries in Support of Defendants' Motion for Summary Judgment
23 in Medeiros v. PG&E, et al., United States District Court, Eastern District of California,
24 Case No. Civ-S-00-1042 LKK DAD PS, including Exhibits A-H to the Declaration.

25 6. Attached as Exhibit 5 to this Declaration is a true and correct copy of the
26 Declaration of Gil Smith in Support of Defendants' Motion for Summary Judgment in
27 Medeiros v. PG&E, et al., Eastern District of California Case No Civ-S-00-1042 LKK DAD
28 PS, including Exhibits A-C to the Declaration.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

7. Attached as Exhibit 6 to this Declaration is a true and correct copy of the Declaration of James Moore in Support of Defendants' Motion for Summary Judgment in Medeiros v. PG&E, et al., United States District Court, Eastern District of California, Case No. Civ-S-00-1042 LKK DAD PS, including Exhibits A-E to the Declaration.

I declare under penalty of perjury under the laws of the State of California that the statements in this declaration are true and correct. Executed on this 7th day of August, 2002, at San Francisco, California.



MAUREEN L. FRIES

HOWARD
RICE
NEMEROVSKI
CANADY
FALK
& RAEBIN
A Professional Corporation

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), 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.