

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

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6 Attorneys for Debtor and Debtor in Possession  
7 PACIFIC GAS & ELECTRIC COMPANY

8  
9 UNITED STATES BANKRUPTCY COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

12 In re  
13 PACIFIC GAS and ELECTRIC  
COMPANY, a California corporation,  
14 Debtor.

HOWARD  
RICE  
NEMEROVSKI  
CANADY  
FALK  
& RABKIN  
A Professional Corporation

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18 Federal I.D. No. 94-0742640  
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Case No. 01-30923 DM

Chapter 11 Case

DECLARATION OF MAUREEN L.  
FRIES IN SUPPORT OF DEBTOR'S  
VALUATION OF CLAIM FOR  
FEASIBILITY PURPOSES (GERI  
MARCHETTI CLAIM NO. 3831)

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

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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 Marchetti v. Pacific Gas & Electric Company,  
5 San Francisco Superior Court Case No. 317231 (the "Marchetti Action"). The documents  
6 attached as exhibits to this declaration are maintained in the normal course of business by  
7 PG&E. I have personal knowledge of the matters set forth in this declaration and if called  
8 upon to testify thereto I could and would competently do so.

9 2. Attached as Exhibit A is a true and correct copy of the Proof of Claim  
10 number 3831 (the "Marchetti Claim") and attached exhibits, filed by Geri Marchetti  
11 ("Marchetti") on or about August 16, 2001 in the matter of In re Pacific Gas & Electric  
12 Company.

13 3. Attached as Exhibit B is a true and correct copy of the First Amended  
14 Complaint for Damages in the Marchetti Action, filed on or about December 11, 2000.

15 4. Attached as Exhibit C is a true and correct copy of a document "Essential  
16 Job Functions for Gas Associate Distribution Engineer," which was Marchetti's job  
17 classification at all material times in the Marchetti Action.

18 5. Attached as Exhibit D is a true and correct copy of a portion of PG&E's  
19 Summary of Benefits Handbook (Bargaining Unit Employees) entitled "Sick Leave and  
20 Disability."

21 6. Attached as Exhibit E is a true and correct copy of the Payroll Change Tag  
22 for Marchetti dated June 25, 1998.

23 7. Attached as Exhibit F is a true and correct copy of a letter from Dr. Lefkos  
24 Aftonomos to Jeanne Mar, Workers' Compensation representative, dated August 3, 1998.

25 8. Attached as Exhibit G is a true and correct copy of a letter from Dr. Lefkos  
26 Aftonomos to Jeanne Mar, Workers' Compensation representative, dated July 9, 1998.

27 9. Attached as Exhibit H is a true and correct copy of Grievance No. 02-33-99,  
28 dated January 6, 1999, filed by Engineers and Scientists of California, Local 20 on behalf of

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Geri Marchetti.

10. Attached as Exhibit I is a true and correct copy of Grievance No. 02-02-99, dated January 6, 1999, filed by Engineers and Scientists of California, Local 20 on behalf of Geri Marchetti

11. Attached as Exhibit J is a true and correct copy of a letter, and attachments, from Collins Arrengo, AA/EEO Consultant to Deborah Randall, dated June 23, 1999.

12. Attached as Exhibit K is a true and correct copy of the Payroll Change Tag for Geri Marchetti, dated November 27, 2001.

13. Attached as Exhibit L is a true and correct copy of a letter from Bryan J. McCormack to the United States Bankruptcy Court, dated February 15, 2002

14. Attached as Exhibit M is a true and correct copy of a Substitution of Attorney in the matter Marchetti v. Pacific Gas and Electric Company, filed on January 22, 2002, in San Francisco Superior Court.

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 22 day of August, 2002. at San Francisco, California.

By: Maureen L. Fries  
MAUREEN L. FRIES

HOWARD  
RICE  
NEMEROVSKI  
CANADY  
BALK  
& 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](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.