

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 Federal I.D. No. 94-0742640

Case No. 01-30923 DM  
Chapter 11 Case  
DECLARATION OF DEBORAH S.  
SHEFLER IN SUPPORT OF DEBTOR'S  
MOTION FOR VALUATION OF  
CLAIM FOR FEASIBILITY PURPOSES  
(SAMUEL ANDERSON, CLAIM NO.  
178)

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

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 Samuel Anderson v. Corestaff Services, Inc., et al., San  
5 Francisco Superior Court Case No. 302556 (the "Anderson 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 Proof of Claim Number  
10 178 (the "Claim") filed by Samuel Anderson on or about June 8, 2001, in PG&E's  
11 bankruptcy proceeding.

12 3. Attached as Exhibit B is a true and correct copy of the First Amended  
13 Complaint filed by Anderson in the Anderson Action. This document is the only material  
14 Anderson submitted as support for the Claim.

15 4. Attached as Exhibit C is a true and correct copy of a letter dated July 19,  
16 2002, from counsel for Corestaff Services, Inc. ("Corestaff"), Anderson's former employer,  
17 acknowledging that Corestaff will fully indemnify and defend PG&E, without reservation, in  
18 the Anderson Action.

19 I declare under penalty of perjury under the laws of the State of California that  
20 the statements in this declaration are true and correct. Executed on this 17 day of August, at  
21 San Francisco, California.

22  
23 By: Deborah S. Shefler  
24 DEBORAH S. SHEFLER

HOWARD  
RICE  
NEMEROVSKI  
CANADY  
FALK  
& RABKIN  
A Professional Corporation

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