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Sacramento, California

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10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 (San Francisco Division)

13 In re	13 Case No. 01-30923 DM
14 PACIFIC GAS & ELECTRIC 15 COMPANY, a California 16 corporation	14 Chapter 11 Case
17 Debtor,	15 Date: January 16, 2004 16 Time: 1:30 p.m. 17 CTRM: 22

18 NOTICE OF MOTION AND MOTION FOR
19 LEAVE TO FILE LATE PROOF OF CLAIM

20 NOTICE IS HEREBY GIVEN that on January 16, 2004, at 1:30 p.m.,
21 or as soon thereafter as the matter may be heard, a hearing will be
22 held on the motion of Karina Arellano ("Movant") for leave to file a
23 claim in this Chapter 11 case after the bar date previously set by the
24 court. The motion will be heard in the United States Bankruptcy
25 Court, Courtroom 22, 235 Pine Street, 22nd Floor, San Francisco,
26 California.

27 Opposition, if any, to the motion must be filed and served on
28 counsel for the Movant at least fourteen (14) days before the hearing
(no later than January 2, 2004).

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1 The Movant respectfully moves this Court for leave to file a late
2 proof of claim pursuant to Federal Rules of Bankruptcy Procedure, Rule
3 9006(b)(1). The Movant's proof of claim, if allowed, will not unduly
4 prejudice the Debtor and the delay in filing the Movant's proof of
5 claim will not substantially impact the judicial proceedings in either
6 this Bankruptcy Court or the related state court action in which the
7 Debtor already is a named defendant. The Movant delayed in filing the
8 proof of claim to this motion as a result of excusable neglect caused
9 by the following facts:

10 On July 2, 2001, the Movant filed a first amended complaint for
11 damages resulting from personal injuries in San Joaquin County
12 Superior Court ("State Court Action"), naming parties other than the
13 Debtor as defendants. As a result of the investigation of an expert
14 witness, the Movant learned for the first time in November of 2001
15 that liability might exist on the part of the Debtor and Southern
16 Pacific Rail Corporation ("Southern Pacific"). After some additional
17 investigation, the Movant added the Debtor as a doe defendant in the
18 State Court Action by a first amendment to the first amended complaint
19 filed on May 21, 2002. On August 16, 2002, the Debtor was served as
20 a defendant in the State Court Action.

21 The Debtor responded by serving the Movant with a notice of
22 filing voluntary petition and imposition of automatic stay on
23 August 19, 2002. After some discussion, counsel for the Movant in the
24 State Court Action sent a letter to the Debtor's counsel inquiring
25 about the Debtor's insurance coverage and requesting that the Debtor
26 stipulate for relief from the automatic stay. The Debtor did not
27 respond until May 9, 2003, when counsel for the Debtor sent a letter
28 to counsel for the Movant in the State Court Action stating that the

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
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In re	Case No. 01-30923 DM
PACIFIC GAS & ELECTRIC COMPANY, a California corporation	Chapter 11 Case
Debtor,	Date: January 16, 2004 Time: 1:30 p.m. CTRM: 22

NOTICE OF MOTION AND MOTION FOR
RELIEF FROM AUTOMATIC STAY

NOTICE IS HEREBY GIVEN that on January 16, 2004, at 1:30 p.m., or as soon thereafter as the matter may be heard, a hearing will be held on the motion of Karina Arellano ("Movant") for relief from the automatic stay of 11 U.S. C. § 362(a) to permit the Movant to liquidate the amount of her claim in her pending state court action against Pacific Gas & Electric Company ("Debtor") and others pending in San Joaquin County Superior Court, Case No. CV018108, entitled Karina Arellano v. Maria Nuno, et al. ("State Court Action"). The motion will be heard in the United States Bankruptcy Court, Courtroom 22, 235 Pine Street, 22nd Floor, San Francisco, California.

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Opposition, if any, to the motion must be filed and served on counsel for the Movant, whose address is identified above, at least fourteen (14) days before the hearing (no later than January 2, 2004).

This motion is made pursuant to 11 U.S.C. section 362(d) on the grounds that cause exists for relief from the automatic stay based on the following facts: there are additional non-debtor defendants in the state court action; the State Court Action concerns only state law issues; the interests of judicial economy will best be served if the State Court Action is allowed to proceed; and maintaining the automatic stay would result in greater prejudice to the Movant than would result to the Debtor. The Movant has also filed a motion for leave to file a late proof of claim, which should be heard simultaneously with this motion. If the motion for leave to file a late proof of claim is not heard within 30 days of filing or concurrently with the filing of this motion, the Movant waives her rights under 11 U.S.C. section 362(e) to have the motion for relief from automatic stay deemed granted.

The amount of damages, if any, that will be awarded to the Movant against the Debtor in the state court action is uncertain. Accordingly, the amount claimed in the Movant's proof of claim is unknown.

Dated: December 17, 2003

HEFNER, STARK & MAROIS, LLP

By Thomas P. Griffin, Jr.
Ronald H. Sargis
Thomas P. Griffin, Jr.
Attorney for Movant
Karina Arellano