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19 *[Attorneys for clients as listed on signature page0]*

20 UNITED STATES BANKRUPTCY COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 In re:
24 PG&E CORPORATION,
25
26 - and -
27
28 PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)

(Jointly Administered)

**NOTICE REGARDING CERTAIN FIRE
VICTIMS' DESIGNATION OF WITNESSES
AND SPEAKING ATTORNEYS FOR
CONFIRMATION HEARING OF DEBTORS'
AND SHAREHOLDER PROPONENTS'
JOINT CHAPTER 11 PLAN OF
REORGANIZATION DATED MARCH 16,
2020**

Date: May 27, 2020
Time: 10:00 a.m.:
Place: Courtroom 17, 450 Golden Gate Ave.,
16th Floor, San Francisco, CA
Judge: Hon. Dennis Montali

¹ Associated as co-counsel on behalf of the Fire
Victim claimants/creditors herein

1 **I. Designation of Witnesses**

2 NOTICE IS HEREBY GIVEN, that pursuant to the Court's May 13, 2020 Order
3 Establishing Confirmation Hearing Protocol, the following Fire Victim Claimants/Creditors: GER
4 Hospitality, LLC, Adolfo Veronese Family, William O'Brien, Ming O'Brien, Fuguan O'Brien;
5 Michael Heinstein, Kye Heinstein, Karen Roberds; Anita Freeman; William N. Steel, Clinton
6 Reilly; Ken Born, Christine Born, Cathy Ference, William Ference, Allen Goldberg, Robert
7 Johnson, Patricia Goodberg, Paul Goodberg, Terence Redmond, Melissa Redmond, Sonoma
8 Court Shops, Inc., and Rita Godward, hereby designate the following witnesses for the
9 confirmation hearing to commence on May 27, 2020, of the Debtors' Joint Chapter 11 Plan of
10 Reorganization dated March 16, 2020.

- 11 1. Eric Lowrey, CIRA, eric@griffinadvisorsinc.com

12 Mr. Lowrey's testimony pertains to the matters raised in his Declaration filed on April 3,
13 2020 in *In re PG&E Corporation, et al.*, United States District Court, Northern District of
14 California Civil Case No. 19-05257(JD) .

15
16 Adverse Witness(es)

17 1. Person(s) Most Knowledgeable at Prime Clerk LLC with regard to (1) total
18 number of fire victims who filed claims in this bankruptcy proceeding; (2) total number of fire
19 victims who filed claims who were represented by counsel; (3) date(s) when Fire Victim Plan
20 Solicitation/Ballots for proposed settlement with Debtors were EMAILED to fire victim
21 claimants; (4) date(s) when Fire Victim Plan Solicitation/Ballots for proposed settlement with
22 Debtors was MAILED to fire victim claimants; (5) date(s) when Fire Victim Plan
23 Solicitation/Ballots for proposed settlement with Debtors were EMAILED to counsel for the fire
24 victims; (6) date(s) when Fire Victim Plan Solicitation/Ballots for proposed settlement with
25 Debtors were MAILED to counsel for fire victim claimants; (7) number of EMAILS with Fire
26 Victim Plan Solicitation/Ballots which were undeliverable; (8) total number of Fire Victim Plan
27 Solicitation/Ballots returned to Prime Clerk, undelivered; by mail or other delivery; (9) total
28 number of Ballots received in which the vote was to approve the Fire Victim Plan; (10) total

1 number of Ballots received in which the vote was to reject the Fire Victim Plan; (12) total number
2 of fire victims who communicated with Prime Clerk stating that ballots had not been
3 received; (13) addresses where Prime Clerk mailed Fire Victim Plan Solicitation/Ballots; (14)
4 any and all attempts to notify fire victims of the Plan Solicitation/Ballots by media, or other
5 method.

6 Witnesses designated by other parties:

- 7 1. Jason P. Wells, Executive Vice President and Chief Financial Officer for PG&E
8 Corp.
- 9 2. Ken Ziman, Managing Director in the Restructuring Group at Lazard Frères &
10 Co. LLC,.
- 11 3. John Boken, Managing Director in the restructuring group at IlixPartners, LLP.
- 12 4. Christina Pullo, Vice President of Global Corporate Actions, at Prime Clerk LLC.
- 13 5. Any additional witness(es) named by any other party.

14 Fire Victim claimants/creditors herein reserve the right to designate additional witnesses
15 for rebuttal.

16 **II. Designation of Speaking Attorneys for Confirmation Hearing**

17 The herein-named Fire Victim claimants'/creditors identify the following as their
18 attorneys who will speak at the at the Confirmation Hearing of the above Debtors on May 27,
19 2020 at 10:00 a.m.:

- 20 1. Richard A. Lapping, Esq., Trodella & Lapping, LLP
21 rich@trodellalapping.com
- 22 2. Jeremiah F. Hallisey, Esq., Hallisey and Johnson, PC
23 jfhallisey@gmail.com
- 24 3. Francis O. Scarpulla, Esq., Scarpulla Law Firm
25 fos@scarpullalaw.com

26 The above identified Fire Victim claimants/creditors reserve the right to designate
27 additional or other speaking attorneys as the confirmation process evolves and as they deem
28

1 necessary or appropriate.

2 Dated: May 22, 2020

3 /s/ Jeremiah F. Hallisey
4 Jeremiah F. Hallisey
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10 Attorneys for William, Ming, and Fuguan O'Brien;
11 Kye and Michael Heinstein; Clint Reilly; Karen
12 Roberds and Anita Freeman; and William N. Steel

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21 Attorneys for GER HOSPITALITY, LLC and
22 ADOLFO VERONESE FAMILY

23 Quentin L. Kopp (SBN 25070)
24 Daniel S. Mason (SBN 54065)
25 Thomas W. Jackson (SBN 107608)
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Attorneys for Ken Born, Christine Born, Cathy Ference,
William Ference, Allen Goldberg, Robert Johnson,
Patricia and Paul Goodberg, Terence Redmond, Melissa
Redmond, Sonoma Court Shops, Inc., Rita Godward

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CERTIFICATE OF SERVICE

I, Karen J. Chedister, declare as follows:

I am over the age of eighteen (18) years and not a party to the within action. My business address is 465 California Street, Suite 405, San Francisco, CA 94104.

On May 22, 2020, I served document(s) described as:

NOTICE REGARDING CERTAIN FIRE VICTIMS’ DESIGNATION OF WITNESSES AND SPEAKING ATTORNEYS FOR CONFIRMATION HEARING OF DEBTORS’ AND SHAREHOLDER PROPONENTS’ JOINT CHAPTER 11 PLAN OF REORGANIZATION DATED MARCH 16, 2020

on the interested parties in this action as follows:

BY E-MAIL/NEF: Service was accomplished through the Notice of Electronic Filing (“NEF”) for all parties and counsel who are registered ECF Users and those identified below:

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct. This declaration was executed on May 22, 2020 at San Francisco, California.

/s/ Karen J. Chedister

Karen J. Chedister, Esq.