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Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Affects PG&E Corporation
 Affects Pacific Gas and Electric Company
 Affects both Debtors
** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

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

**NOTICE OF AGENDA FOR
DECEMBER 17, 2019, 10:00 A.M.
OMNIBUS HEARING**

Date: December 17, 2019
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

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**PROPOSED AGENDA FOR
DECEMBER 17, 2019, 10:00 A.M. (PACIFIC TIME)
OMNIBUS HEARING**

I: MATTERS SCHEDULED TO BE HEARD IN MAIN CASE: No. 19-30088 (DM)

RELIEF FROM STAY MOTIONS

1. **Hearn Motion for Relief from Stay**: *Motion for Relief from Automatic Stay [Dkt. 4820]*.

Response Deadline: December 12, 2019, at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. Debtors' Preliminary Opposition to Todd Hearn's Motion for Relief from Automatic Stay [Dkt. 5095].
- B. Declaration of Theodore E. Tsekerides in Support of Debtors' Preliminary Opposition to Todd Hearn's Motion for Relief from Automatic Stay [Dkt. 5097].
- C. Declaration of Stacy Campos in Support of Debtors' Preliminary Opposition to Todd Hearn's Motion for Relief from Automatic Stay [Dkt. 5098].

Related Documents:

- D. Declaration of Anne Costin in Support of Motion for Relief from Automatic Stay [Dkt. 4820-2].

Status: This matter is going forward on a contested basis.

2. **Vlazakis Relief from Stay Motion**: *Motion as to Inapplicability of Stay, and in the Alternative for Relief from Stay Title 11 U.S.C. §§362(a)(1) and (d) [Dkt. 4846]*.

Response Deadline: December 12, 2019, at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. Debtors' Preliminary Limited Opposition to Vlazakis Defendants' Motion as to the Inapplicability of Stay, and in the Alternative for Relief from Stay [Dkt. 5089].
- B. Declaration of Kenyon Mark Lee in Support of Debtors' Preliminary Limited Opposition to Vlazakis Defendants' Motion as to the Inapplicability of Stay, and in the Alternative for Relief from Stay [Dkt. 5090].
- C. Request for Judicial Notice in Support of Debtors' Preliminary Limited Opposition to Vlazakis Defendants' Motion as to the Inapplicability of Stay, and in the Alternative for Relief from Stay [Dkt. 5091].

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Related Documents:

- D. Declaration of Ronald F. Beretska, Jr. in Support of Motion as to Inapplicability of Stay, and in the Alternative for Relief from Stay Title 11 U.S.C. §§362(a)(1) and (d) [Dkt. 4846-2].
- E. Declaration of Maria A. Barbis in Support of Motion as to Inapplicability of Stay, and in the Alternative for Relief from Stay Title 11 U.S.C. §§362(a)(1) and (d) [Dkt. 4846-3].

Status: This matter is going forward on a contested basis.

3. **Ghost Ship Fire Cases Relief from Stay Motion:** *Motion for Relief from Automatic Stay to Permit the Courts of the State of California to Conduct a Jury Trial and Related Pretrial and Posttrial Matters in Connection with the Ghost Ship Fire Cases* [Dkt. 4875].

Response Deadline: December 12, 2019, at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. Joinder of Official Committee of Tort Claimants to Ghost Ship Plaintiffs' Motion for Relief from Stay [Dkt. No. 4875] [Dkt. 4945].
- B. Joinder in Motion for Relief from Automatic Stay in Connection with the Ghost Ship Fire Claims [Dkt. 5036].
- C. Debtors' Preliminary Opposition to Motion for Relief from Automatic Stay to Permit the Courts of the State of California to Conduct a Jury Trial and Related Pretrial and Post Trial Matters in Connection with the Ghost Ship Fire Cases [Dkt. 5093].
- D. Declaration of Elizabeth Collier in Support of Debtors' Preliminary Opposition to Motion for Relief from Automatic Stay to Permit the Courts of the State of California to Conduct a Jury Trial and Related Pretrial and Post Trial Matters in Connection with the Ghost Ship Fire Cases [Dkt. 5094].
- E. Joinder of Official Committee of Unsecured Creditors to Debtors' Preliminary Opposition to Ghost Ship Executive Committee's Motion for Relief from the Automatic Stay [Dkt. 5100].

Related Documents:

- F. Declaration of Mary E. Alexander in Support of Motion for Relief from Automatic Stay to Permit the Courts of the State of California to Conduct a Jury Trial and Related Pretrial and Posttrial Matters in Connection with the Ghost Ship Fire Cases [Dkt. 4877].
- G. Memorandum of Points and Authorities in Support of Motion for Relief from Automatic Stay to Permit the Courts of the State of California to

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Conduct a Jury Trial and Related Pretrial and Posttrial Matters in Connection with the Ghost Ship Fire Cases [Dkt. 4878].

- H. Relief from Stay Cover Sheet [Dkt. 4879].
- I. Supplement to Motion for Relief from Automatic Stay to Permit the Courts of the State of California to Conduct a Jury Trial and Related Pretrial and Posttrial Matters in Connection with the Ghost Ship Fire Cases [Dkt. 4962].

Status: This matter is going forward on a contested basis.

CONTESTED MATTER GOING FORWARD

4. **Tort Claimants RSA Motion**: Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors and TCC to Enter into Restructuring Support Agreement with the TCC, Consenting Fire Claimant Professionals, and Shareholder Proponents, and (II) Granting Related Relief [Dkt. 5038].

Response Deadline: December 16, 2019, at 12:00 p.m. (Pacific Time).

Responses Filed:

- A. (Joseph Feist) Camp Fire Claimants' Objection to Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors and TCC to Enter into Restructuring Support Agreement with the TCC, Consenting Fire Claimant Professionals, and Shareholder Proponents, and (II) Granting Related Relief [Dkt. 5115].
- B. Statement of the United States of America in Response to Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors and TCC to Enter into Restructuring Support Agreement with the TCC, Consenting Fire Claimant Professionals, and Shareholder Proponents, and (II) Granting Related Relief [Dkt. 5117].
- C. Reservation of Rights by California Public Utilities Commission Regarding (A) Debtors' Motion Seeking Approval of RSA and (B) the Amended Plan [Dkt. 5121].
- D. Response of the California State Agencies to Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors and TCC to Enter into Restructuring Support Agreement with the TCC, Consenting Fire Claimant Professionals, and Shareholder Proponents, and (II) Granting Related Relief [Dkt. 5123].
- E. United States Trustee's Response to Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors and TCC to Enter into Restructuring Support Agreement with the TCC, Consenting Fire

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Claimant Professionals, and Shareholder Proponents, and (II) Granting Related Relief [Dkt. 5124].

- F. (Kenneth Roye) Camp Fire Claimants' Objection to Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors and TCC to Enter into Restructuring Support Agreement with the TCC, Consenting Fire Claimant Professionals, and Shareholder Proponents, and (II) Granting Related Relief [Dkt. 5125].
- G. Securities Lead Plaintiff's Statement and Reservation of Rights With Respect to [ECF No. 5038] [Dkt. 5127].
- H. Statement and Reservation of Rights of the City of San Jose in Response to (I) the Debtors' Motion to Approve the Tort Claimants RSA Motion, and (II) The Court's Memorandum Regarding Confirmation Issues [Dkt. 5128].
- I. The Adventist Claimants' and Feather Canyon's Response to and Reservation of Rights re: Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors and TCC to Enter into Restructuring Support Agreement with the TCC, Consenting Fire Claimant Professionals, and Shareholder Proponents, and (II) Granting Related Relief [Dkt. 5129].
- J. Limited Objection of the Ad Hoc Committee of Senior Unsecured Noteholders to Debtors' Motion to Enter Into Restructuring Support Agreement with the Official Committee of Tort Claimants, Consenting Fire Claimant Professionals and Shareholder Proponents [Dkt. 5131].
- K. Objection of the Official Committee of Unsecured Creditors Regarding Debtors' Motion for Approval of Restructuring Support Agreement with TCC, Consenting Fire Claimant Professionals and Shareholder Proponents [Dkt. 5132].

Related Documents:

- L. Declaration of Jason P. Wells in Support of Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors and TCC to Enter into Restructuring Support Agreement with the TCC, Consenting Fire Claimant Professionals, and Shareholder Proponents, and (II) Granting Related Relief [Dkt. 5039].

Status: This matter is going forward on a contested basis.

1 **STATUS CONFERENCE**

2 5. **Notice of Filing of Joint Chapter 11 Plan:** *Notice of Filing of Debtors' and*
3 *Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated December 12, 2019*
4 **[Dkt. 5102].**

- 5 A. Joint Chapter 11 Plan of Reorganization of Official Committee of Tort
6 Claimants and Ad Hoc Committee of Senior Unsecured Noteholders
7 **[Dkt. 4257].**
- 8 B. Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of
9 Reorganization Dated December 12, 2019 **[Dkt. 5101].**
- 10 C. Statement of the United States of America in Response to the Court's
11 Memorandum Regarding Confirmation Issues **[Dkt. 5087].**
- 12 D. Statement of the California State Agencies in Response to the Court's
13 Memorandum Regarding Confirmation Issues **[Dkt. 5104].**
- 14 E. Reservation of Rights by California Public Utilities Commission
15 Regarding (A) Debtors' Motion Seeking Approval of RSA and
16 (B) the Amended Plan **[Dkt. 5121].**
- 17 F. Statement and Reservation of Rights of the City of San Jose in Response
18 to (I) the Debtors' Motion to Approve the Tort Claimants RSA Motion,
19 and (II) The Court's Memorandum Regarding Confirmation Issues
20 **[Dkt. 5128].**
- 21 G. Joinder of Certain Insurers of Debtor in Response to Court's
22 Memorandum Regarding Confirmation Issues, and Reservations of Rights
23 **[Dkt. 5130].**

24 Related Order:

25 H. Memorandum Regarding Confirmation Issues **[Dkt. 4760]**

26 Status: The status conference was continued to December 17, 2019 by
27 November 19, 2019 Docket Text Order.

28 **RESOLVED AND CONTINUED MATTERS**

6. **Motion to Permit Contract Termination:** *Notice of Motion and Motion of*
Henrietta D Energy Storage LLC for Entry of an Order Modifying the Automatic Stay to Permit
Contract Termination **[Dkt. 4850].**

Response Deadline: December 12, 2019, at 4:00 p.m. (Pacific Time).

Related Documents:

- A. Relief from Stay Cover Sheet **[Dkt. 4851].**
- B. Declaration of Christopher Streeter in Support of Motion of Henrietta D
Energy Storage, LLC for Entry of an Order Modifying the Automatic Stay
to Permit Contract Termination **[Dkt. 4852].**

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Status: The parties have reached an agreement to resolve this motion. This matter has been continued to January 14, 2020 by agreement of the parties to permit the parties to document their agreement.

7. **Designation of Claims Motion:** *Notice of Debtors' Designation of Claims Filed by the United States of America, the State of California and Adventist Health System as Unliquidated and Subject to Estimation Under Section 502(c) of the Bankruptcy Code [Dkt. 4553].*

Response Deadline: December 12, 2019, at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. Opposition of the United States of America to Notice of Debtors' Designation of Claims Filed by the United States of America, the State of California and Adventist Health System as Unliquidated and Subject to Estimation Under Section 502(c) of the Bankruptcy Code [Dkt. 4771].
- B. Response of the California State Agencies to Debtors' Notice of Designation of Claims Filed by the State of California as Unliquidated and Subject to Estimation Under Section 502(c) of the Bankruptcy Code [Docket No. 4553] [Dkt. 4774].
- C. The Adventist Claimants' Objection to the Notice of Debtors' Designation of Claims Filed by the United States of America, the State of California and Adventist Health System as Unliquidated and Subject to Estimation Under Section 502(c) of the Bankruptcy Code [DE # 4553] [Dkt. 4783].
- D. Stipulation by and Among the Debtors, the United States of America, Certain California State Agencies and the Adventist Claimants Re: Designation of Claims as Unliquidated and Subject to Estimation Under Section 502(c) of the Bankruptcy Code [DE # 4553] [Dkt. 5066].

Related Document:

- E. Debtors' Response to the Oppositions Filed by the United States of America, the State of California and Adventist Health on Certain Claims Subject to Estimation Under Section 502(c) of the Bankruptcy Code [Dkt. 5004].

Related Order:

- F. Order Approving Stipulation by and Among the Debtors, the United States of America, Certain California State Agencies and the Adventist Claimants Re: Designation of Claims as Unliquidated and Subject to Estimation Under Section 502(c) of the Bankruptcy Code [DE # 4553] [Dkt. 5088].

Status: This matter has been resolved by stipulation [Dkt. 5066] and order [Dkt. 5088] and taken off calendar by December 12, 2019 Docket Text Order.

1 8. **Debtors' Application for McKinsey & Company, Inc.**: *Application of Debtors*
2 *Pursuant to 11 U.S.C. §§ 363(b) and 105(a) for Authority to Enter Into, Perform Under and*
3 *Make Payments Under Certain Consulting Contracts with McKinsey & Company, Inc. United*
4 *States [Dkt. 3919].*

5 Response Deadline: December 10, 2019, at 4:00 p.m. (Pacific Time).

6 Responses Filed:

7 A. Statement of Jay Alix [Dkt. 4426].

8 Status: This matter has been continued to January 14, 2020 by Dkt. 4984.

9 9. **Exit Financing Motion**: *Debtors' Motion for Entry of Orders (I) Approving*
10 *Terms of, and Debtors' Entry Into and Performance Under, Exit Financing Commitment Letters*
11 *and (II) Authorizing Incurrence, Payment and Allowance of Related Fees and/or Premiums,*
12 *Indemnities, Costs and Expenses as Administrative Expense Claims [Dkt. 4446].*

13 Response Deadline: December 10, 2019, at 4:00 p.m. (Pacific Time).

14 Responses Filed:

15 A. Letter from the Official Committee of Unsecured Creditors to the
16 Honorable Dennis Montali Regarding Exit Financing Discovery
17 [Dkt. 4562].

18 B. Letter from the Ad Hoc Committee of Senior Unsecured Noteholders to
19 the Honorable Dennis Montali in Regards to November 4, 2019 Letter
20 from Creditors' Committee [Dkt. 4566].

21 C. Letter from the Official Committee of Tort Claimants to the Honorable
22 Dennis Montali Regarding Exit Financing Discovery [Dkt. 4575].

23 D. Letter from the Debtors to the Honorable Dennis Montali in Response to
24 Letters Filed by Requesting Parties [Dkt. 4577].

25 E. Letter Regarding Continuance of the December 17, 2019 Hearing on the
26 Debtors' Motion for Entry of Orders (I) Approving Terms of, and
27 Debtors' Entry Into and Performance Under, Exit Financing Commitment
28 Letters and (II) Authorizing Incurrence, Payment, and Allowance of
Related Fees and/or Premiums, Indemnities, Costs and Expenses as
Administrative Expense Claims (the Motion) and Extension of Time to
Respond to that Motion [Dkt. 4968].

F. Letter Joining the Official Committee of Unsecured Creditors Request for
a Continuance of the December 17, 2019 Hearing on the Debtors' Motion
for Entry of Orders (I) Approving Terms of, and Debtors' Entry Into and
Performance Under, Exit Financing Commitment Letters and (II)
Authorizing Incurrence, Payment, and Allowance of Related Fees and/or
Premiums, Indemnities, Costs and Expenses as Administrative Expense
Claims (the Motion) and Extension of Time to Respond to that Motion
[Dkt. 4970].

G. Letter Brief of the TCC to the Honorable Dennis Montali [Dkt. 4971].

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Related Documents:

H. Declaration of Kenneth S. Ziman in Support of Debtors' Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry into and Performance Under, Exit Financing Commitment Letters and (II) Authorizing Incurrence, Payment and Allowance of Related Fees and/or Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims [**Dkt. 4447**].

Status: This matter has been continued to January 14, 2020 by Docket Text Order on December 11, 2019.

10. Order Approving Fee Procedures: *Order Granting Fee Examiner's Motion to Approve Fee Procedures* [**Dkt. 4770**].

Responses Filed:

A. Notice of Hearing Allowing and Authorizing Payment of First Interim Fee Applications of Multiple Fee Applicants Based Upon Compromises with the Fee Examiner [**Dkt. 5065**].

Related Documents:

B. First Interim Application of Baker & Hostetler LLP for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period February 15, 2019 Through May 31, 2019 [**Dkt. 2995**].

C. First Interim Fee Application of Munger, Tolles & Olson LLP for Compensation for Services and Reimbursement of Expenses as Attorneys to the Debtors and Debtors in Possession for Certain Matters from January 29, 2019 Through May 31, 2019 [**Dkt. 2996**].

D. First Interim Application of FTI Consulting, Inc. for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period February 12, 2019 Through May 31, 2019 [**Dkt. 3137**].

E. First Interim Application of Jenner & Block LLP as Special Corporate Defense and Energy Counsel to the Debtors for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from January 29, 2019 Through May 31, 2019 [**Dkt. 3465**].

F. Summary Sheet to First Interim Fee Application of Cravath, Swaine & Moore LLP For Allowance and Payment of Compensation and Reimbursement of Expenses for the Period January 29, 2019 Through and Including May 31, 2019 [**Dkt. 3683**].

G. Stipulated Amendment to First Interim Application of Baker & Hostetler LLP for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period February 15, 2019 Through May 31, 2019 [**Dkt. 4926**].

Status: This matter has been taken off calendar by December 12, 2019 Docket Text Order.

1 **PLEASE TAKE NOTICE** that copies of any pleadings filed with the Court and
2 referenced herein can be viewed and/or obtained: (i) by accessing the Court's website at
3 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450
4 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims
5 agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-
6 4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-
7 mail at: pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents
8 on the Bankruptcy Court's website.

9 Dated: December 16, 2019

WEIL, GOTSHAL & MANGES LLP
KELLER & BENVENUTTI LLP

By: /s/ Dara L. Silveira
Dara L. Silveira

Attorneys for Debtors and Debtors in Possession

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