

1 WEIL, GOTSHAL & MANGES LLP
Stephen Karotkin (*pro hac vice*)
2 (stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
3 (ray.schrock@weil.com)
Jessica Liou (*pro hac vice*)
4 (jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
5 (matthew.goren@weil.com)
767 Fifth Avenue
6 New York, NY 10153-0119
Tel: 212 310 8000
7 Fax: 212 310 8007

8 KELLER & BENVENUTTI LLP
Tobias S. Keller (#151445)
9 (tkeller@kellerbenvenutti.com)
Jane Kim (#298192)
10 (jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
11 San Francisco, CA 94108
Tel: 415 496 6723
12 Fax: 650 636 9251

13 *Attorneys for Debtors and Debtors in Possession*

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

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC**
21 **COMPANY,**

22 **Debtors.**

- 23 Affects PG&E Corporation
24 Affects Pacific Gas and Electric
Company
25 Affects both Debtors

26 ** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

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

**NOTICE OF HEARING ON MOTION
CONFIRMING RELIEF GRANTED UNDER FINAL
ORDER PURSUANT TO 11 U.S.C. §§ 105(a), 362(d),
363(b), 363(c), AND 364 AND FED. R. BANKR. P.
4001, 6003, AND 6004 (I) AUTHORIZING DEBTORS
TO (A) MAINTAIN INSURANCE POLICIES,
WORKERS' COMPENSATION PROGRAM, AND
SURETY BOND PROGRAM AND (B) PAY ALL
OBLIGATIONS WITH RESPECT THERETO; AND
(II) GRANTING RELIEF FROM THE AUTOMATIC
STAY WITH RESPECT TO WORKERS'
COMPENSATION CLAIMS**

Hearing Date: February 26, 2020
Hearing Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: February 19, 2020
4:00 p.m. (Pacific Time)

1 **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E
2 Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession (the
3 “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), each filed a voluntary
4 petition for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”)
with the United States Bankruptcy Court for the Northern District of California (San Francisco
Division) (the “**Bankruptcy Court**”).

5 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on
6 **February 26, 2020, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) in the courtroom of the
7 Honorable Dennis Montali, United States Bankruptcy Judge, Courtroom 17, 16th Floor, 450 Golden
Gate Avenue, San Francisco, California 94102.

8 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters to be heard at
9 the Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Motion Confirming Relief*
10 *Granted Under Final Order Pursuant to 11 U.S.C. §§ 105(a), 362(d), 363(b), 363(c), and 364 and*
11 *Fed. R. Bankr. P. 4001, 6003, and 6004 (I) Authorizing the Debtors to (A) Maintain Insurance*
Policies, Workers’ Compensation Program, and Surety Bond Program and (B) Pay All Obligations
with Respect Thereto; and (II) Granting Relief from the Automatic Stay with Respect to Workers’
Compensation Claims filed by the Debtors on February 5, 2020 [Dkt. No. 5640] (the “**Motion**”).

12 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Motion must
13 be in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtors at the
14 above-referenced addresses so as to be received by no later than **4:00 p.m. (Pacific Time) on**
15 **February 19, 2020**. Any oppositions or responses must be filed and served on all “Standard Parties”
16 as defined in, and in accordance with, the *Second Amended Order Implementing Certain Notice and*
17 *Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (the “**Case Management**
Order”). **Any relief requested in the Motion may be granted without a hearing if no opposition**
18 **is timely filed and served in accordance with the Case Management Order**. In deciding the
19 Motion, the Court may consider any other document filed in these Chapter 11 Cases and related
20 Adversary Proceedings.

21 **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and its supporting papers
22 can be viewed and/or obtained: (i) by accessing the Court’s website at <http://www.canb.uscourts.gov>,
23 (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA
24 94102, or (iii) from the Debtors’ notice and claims agent, Prime Clerk LLC , at
25 <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based
26 parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com.
27 Note that a PACER password is needed to access documents on the Bankruptcy Court’s website.

28 Dated: February 5, 2020

WEIL, GOTSHAL & MANGES LLP
KELLER & BENVENUTTI LLP

/s/ Thomas B. Rupp
Thomas B. Rupp

Attorneys for Debtors and Debtors in Possession