



## U.S. Department of Justice

*United States Trustee  
Northern and Eastern  
Districts of California and Nevada*

*San Francisco Field Office  
450 Golden Gate Ave, Suite 05-0153  
San Francisco, California 94102*

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### AMENDED

February 7, 2019

Re: *In re PG&E Corporation*, Case No. 19-30088 and  
*In re Pacific Gas and Electric Company*, Case No. 19-30089  
(U.S. Bankruptcy Court, N.D.C.A. – San Francisco Division)

### **Notice of Formation of Official Committee of Tort Claimants**

PG&E Corporation and Pacific Gas and Electric Company (“Debtors”) filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code on January 29, 2019. Andrew R. Vara, the Acting United States Trustee for Region 3 (“the United States Trustee”),<sup>1</sup> intends to form an official committee of tort claimants (“Tort Claimants’ Committee”) to represent the interests and act on behalf of all persons with tort claims against the Debtors. Persons selected as members will represent the interests of all tort claimants without regard to any differences in the types of claims they might hold against the Debtors. Additional information about the rights and duties of the Tort Claimants’ Committee is set forth below.

**If you wish to be considered for membership on the Tort Claimants’ Committee**, please complete the enclosed Questionnaire and return it to the Office of the United States Trustee so that it is received **no later than 12:00 p.m. (PST) on February 13, 2019**. To return your completed and signed form, you must either: (1) submit a digital copy by email to [Ankey.To.@usdoj.gov](mailto:Ankey.To.@usdoj.gov); or (2) submit the original by fax or mail to the above number or address. Timely return of the Questionnaire does not guarantee appointment to the Tort Claimants’ Committee, but only that you will be considered. If you do not wish to serve on the Tort Claimants’ Committee, you do not need to return the form.

The United States Trustee will be holding a meeting on **February 14, 2019 at 10:00 a.m. (PST)** at the following location:

**Phillip Burton Federal Building and U.S. Courthouse  
California Conference Room  
450 Golden Gate Avenue, 2<sup>nd</sup> Floor  
San Francisco, CA 94102**

Notice of time and location will be posted on the United States Trustee’s website at: <https://www.justice.gov/ust-regions-r17/region-17-organizational-meetings>. The purpose of the meeting will be for the United States Trustee to obtain necessary additional information that might help in the forming of the official Tort Claimants’ Committee. This meeting will not be a general informational session about the chapter 11 cases.

Attendance at the meeting is not mandatory. You need not attend the meeting to be considered for membership on the committee if your completed Questionnaire provides all the information sought by the United States

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<sup>1</sup> Tracy Hope Davis, the United States Trustee for Region 17 is recused from the above-referenced cases.


Trustee, including your contact information to enable the United States Trustee to communicate with you prior to the meeting.

Please note on your Questionnaire whether you or your representative intends to attend the meeting. If you send someone to represent you at the meeting, that representative must present your written proxy authorizing him or her to act on your behalf.

After the conclusion of the meeting, the United States Trustee will evaluate the information that has been presented to him and appoint a Tort Claimants' Committee. The United States Trustee will file a notice of appointment with the bankruptcy court.

Sincerely,

ANDREW R. VARA  
ACTING UNITED STATES TRUSTEE, REGION 3

By: **DONNA  
TAMANAHA**  Digitally signed by DONNA  
TAMANAHA  
Date: 2019.02.08 09:12:16  
-08'00'

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Donna S. Tamanaha  
Assistant United States Trustee

Attachments  
Questionnaire and Information Sheet

cc: Tobias S. Keller (via email)  
Stephen Karotkin (via email)

## **Official Tort Claimants' Committee -- Additional Information**

**Powers and Duties of Tort Claimants' Committee.** Members of the Tort Claimants' Committee appointed under section 1102(a) of the Bankruptcy Code will be fiduciaries representing all tort claimants without regard to any differences in the types of claims that individual employees or the members might hold against the Debtors. Section 1103 of the Bankruptcy Code provides, among other things, that the Tort Claimants' Committee may consult with the debtor and participate in the formulation of a plan for the adjustment of the Debtors' debts. The Tort Claimants' Committee may also perform such other services as are in the interests of the tort claimants whom it represents. Federal Rule of Bankruptcy Procedure 2019, as amended, requires each member of the Tort Claimants' Committee to file a verified statement disclosing its name, its address, and the nature and amount of each "disclosable economic interest"<sup>2</sup> held in relation to the Debtors on the date the Tort Claimants' Committee was formed. Rule 2019 also requires the Tort Claimants' Committee to file a verified supplemental statement updating the earlier information (if information previously disclosed has materially changed) when taking a position before the court or soliciting votes on a plan.

**Employment of Professionals and Reimbursement of Expenses.** Section 1103 of the Bankruptcy Code provides that the Tort Claimants' Committee may employ one or more attorneys, accountants or other professionals to represent or perform services for the Tort Claimants' Committee. The decision to employ particular professionals should occur at a scheduled meeting of the Tort Claimants' Committee where a majority of the members of the Tort Claimants' Committee is present.

**Other Matters.** The Tort Claimants' Committee should elect a chairperson and may adopt bylaws. As a party in interest, the Tort Claimants' Committee may be heard on any issue in the bankruptcy case. Federal Bankruptcy Rule 2002(i) requires that the Tort Claimants' Committee (or its authorized agent) receive all notices concerning motions and hearings in the bankruptcy case.

Please be advised that once an Tort Claimants' Committee is formed, the United States Trustee will file a notice of appointment in the court record that contains contact information for any person appointed, including the person's name, address, and telephone number.

**Privacy Act Statement.** 11 U.S.C. § 1102 authorizes the collection of this information. The information will be used by the United States Trustee to determine your qualifications for appointment to the Tort Claimants' Committee. Disclosure of this information may be to a the appropriate federal, state, local, regulatory, tribal, or foreign law enforcement agency when the information indicates a violation or potential violation of law. Other disclosures may be made for routine purposes. For a discussion of the types of routine disclosures that may be made, you may consult the Executive Office for United States Trustee's systems of records notice, UST-001, "Bankruptcy Case Files and Associated Records." See 71 Fed. Reg. 59,818 et seq. (Oct. 11, 2006). A copy of the notice may be obtained at the following link: [http://www.justice.gov/ust/eo/rules\\_regulations/index.htm](http://www.justice.gov/ust/eo/rules_regulations/index.htm). Your disclosure of information is voluntary; however, failure to provide the requested information may result in the rejection of your application to be appointed to the Tort Claimants' Committee.

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<sup>2</sup> "Disclosable economic interest" means any claim, interest, pledge, lien, option, participation, derivative instrument, or any other right or derivative right granting the holder an economic interest that is affected by the value, acquisition, or disposition of a claim or interest.



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February 5, 2019

Re: *In re PG&E Corporation*, Case No. 19-30088 and  
*In re Pacific Gas and Electric Company*, Case No. 19-30089  
(U.S. Bankruptcy Court, N.D.C.A. – San Francisco Division)

**QUESTIONNAIRE FOR OFFICIAL COMMITTEE OF TORT CLAIMANTS**  
**("TORT CLAIMANTS' COMMITTEE")**

**PLEASE RETURN YOUR COMPLETED AND SIGNED FORM SO THAT IT IS RECEIVED NO LATER THAN 12:00 P.M. (PST) ON FEBRUARY 13, 2019. TO RETURN YOUR COMPLETED AND SIGNED FORM, YOU MUST EITHER: (1) SUBMIT A DIGITAL COPY BY EMAIL TO [Ankey.To@usdoj.gov](mailto:Ankey.To@usdoj.gov); OR (2) SUBMIT THE ORIGINAL BY FAX OR MAIL TO THE ABOVE NUMBER OR ADDRESS.**

PLEASE TYPE OR PRINT CLEARLY. ATTACH ADDITIONAL SHEETS IF NECESSARY TO FULLY ANSWER ANY QUESTION.

I am willing to serve on the Tort Claimants' Committee. Yes ( ) No ( )

A. Claimant's Name and Contact Information:

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Phone: \_\_\_\_\_  
Fax: \_\_\_\_\_  
E-mail: \_\_\_\_\_

B. Counsel (If Any) for Claimant and Contact Information:

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Phone: \_\_\_\_\_  
Fax: \_\_\_\_\_  
E-mail: \_\_\_\_\_

C. If you have been contacted by a professional person(s) (e.g., attorney, accountant, or financial advisor) regarding the formation of this Tort Claimants' Committee, please provide that individual's name and/or contact information:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- D. Amount of Claim (U.S. \$) \_\_\_\_\_
- E. If your claim is against more than one debtor, list all debtors: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
- F. Describe the nature of your claim(s), including the amount of the claim, the basis for the claim, and any other relevant information. Please be as specific as possible, including whether the claim is for wrongful death, personal injury, property damage and/or business losses. If any portion of the claim(s) arises from litigation, please state the nature of the claim, the case number and jurisdiction (if applicable) and the status.  
 \_\_\_\_\_  
 \_\_\_\_\_
- G. Would your schedule permit you to actively participate on the Tort Claimants' Committee by attending weekly meetings (either by telephone or in person)? Yes ( ) No ( )

**Representations:**

1. Are you or the person you represent in any way "affiliated" with any of the Debtors within the meaning of Section 101(2) of the Bankruptcy Code, or a shareholder of, or related to, the debtor(s)? Yes ( ) No ( )  
 If a shareholder, state the number of shares:  
 \_\_\_\_\_
2. Do you, or the person you represent, engage in a business which directly or indirectly competes with any of the businesses of the Debtor(s)? Yes ( ) No ( )
3. Have you ever been or are you an officer, director, agent, representative or employee of the Debtor(s)?  
 Yes ( ) No ( ) Does your claim arise from this relationship? Yes ( ) No ( )
4. Have you or your attorney entered into a settlement agreement with the Debtors regarding resolution of your claim? Yes ( ) No ( )
5. Do you have a claim against any entity affiliated with the Debtors? Yes ( ) No ( )  
 State the name of the entity and the nature and amount of the claims:  
 \_\_\_\_\_  
 \_\_\_\_\_
6. Do you or any affiliated entities have any other claims against, or debt or equity securities of, the Debtor(s)? Yes ( ) No ( )
7. Do you or any affiliated entities have any financial arrangement that may affect the value of your claim(s) against or interest(s) in the Debtor(s) (e.g., personal guarantees, credit insurance, etc.)? Yes ( ) No ( )
8. If you have given a proxy to a third party either to represent you at the Tort Claimants' Committee formation meeting, or in connection with your claim, please attach a copy of the written proxy. If a professional person has arranged for someone to hold a proxy on your behalf, please identify that individual: \_\_\_\_\_  
 \_\_\_\_\_

**You may attach a written statement to explain or supplement any responses.**

I hereby certify that, to the best of my knowledge and belief, the answers to this Questionnaire are true and correct. By executing this Questionnaire, I also agree to the restrictions and conditions set forth in the preceding paragraphs and in the Tort Claimants' Committee Information Sheet, and I agree to provide the periodic certifications upon the request of the United States Trustee.

**Date:** \_\_\_\_\_

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Print Name**

\_\_\_\_\_  
**Title**