1 2 3 4 5 6 7 8 9	JEREMIAH F. HALLISEY (SBN 4001) KAREN J. CHEDISTER (SBN 99473) HALLISEY AND JOHNSON PC 465 California St, Ste 405 San Francisco, CA 94104 Telephone: (415) 433—5300 Email: jfhallisey@h-jlaw.com jfhallisey@gmail.com QUENTIN L. KOPP (SBN 25070) DANIEL S. MASON (SBN 54065) THOMAS W. JACKSON (SBN 107608) FURTH SALEM MASON & LI LLP 640 Third Street, 2nd Floor Santa Rosa, CA 95404-4445 Telephone: (707) 244-9422 Email: quentinlkopp@gmail.com dmason@fsmllaw.com tjackson@fsmllaw.com	FRANCIS O. SCARPULLA (SBN 41059) PATRICK B. CLAYTON (SBN 240191) LAW OFFICES OF FRANCIS O. SCARPULLA 456 Montgomery Street, 17 th Floor San Francisco, CA 94104 Tel: (415) 788-7210 Email: fos@scarpullalaw.com pbc@scarpullalaw.com			
11	[Attorneys for clients as listed on signature page])				
12	UNITED STATES BANKRUPTCY COURT				
13	NORTHERN DISTRICT OF CALIFORNIA				
14	SAN FRAN	CISCO DIVISION			
15		Bankruptcy Case No. 19-30088 (DM)			
16	In re:	Chapter 11			
17	PG&E CORPORATION,	(Lead Case)			
18	- and -	(Jointly Administered)			
19	PACIFIC GAS AND ELECTRIC COMPANY,	DECLARATION OF JEREMIAH F. HALLISEY, ESQ. IN SUPPORT OF			
20	Debtors.	JOINDER OF CERTAIN FIRE VICTIMS IN WILLIAM B. ABRAMS MOTION TO DESIGNATE IMPROPERLY SOLICITED			
21 22		VOTES PURSUANT TO 11 U.S.C. §§ 1125(B) AND 1126(E) AND BANKRUPTCY			
23		RULE 2019			
23		Date: May 12, 2020 Time: 10:00 a.m.:			
25		Place: Courtroom 17, 450 Golden Gate Ave., 16 th Floor, San Francisco, CA			
26					
27	I, Jeremiah F. Hallisey, declare as follo	ows:			
28	1. I am a member in good standing of the State Bar of California and am the attorney				
20	5	<i>y</i>			

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of record for claimants/fire victims William O'Brien, Ming O'Brien, Fuguan O'Brien; Michael Heinstein, Kye Heinstein, Karen Roberds. Anita Freeman; William N. Steel, and Clinton Reilly in this proceeding. 2. I have personal knowledge of the facts stated herein and I could and would competently and truthfully testify to those facts if called as witness. 3. This Declaration is submitted in support of the Joinder of Certain Fire Victims in		
this proceeding. 2. I have personal knowledge of the facts stated herein and I could and would competently and truthfully testify to those facts if called as witness.		
2. I have personal knowledge of the facts stated herein and I could and would competently and truthfully testify to those facts if called as witness.		
competently and truthfully testify to those facts if called as witness.		
3. This Declaration is submitted in support of the Joinder of Certain Fire Victims in		
William B. Abrams Motion to Designate Improperly Solicited Votes Pursuant to 11 U.S.C. §§		
1125(B) and 1126(E) and Bankruptcy Rule 2019 14 3.		
4. Attached hereto as Exhibit 1 is a true and correct copy of the Declaration of Karer		
Lynn Ingalls, <i>Pro Per Claimant and Fire Victim</i> , dated May 7, 2020. Attached hereto as Exhibit		
2 is a true and correct copy of the Declaration of Debbie Pool, <i>Pro Per</i> Claimant and Fire Victim		
dated May 7, 2020.		
I declare under penalty of perjury that the foregoing is true and correct. Executed on May		
10, 2020 at San Francisco California.		
/a/ Ioromiah E. Halligay		
<u>/s/ Jeremiah F. Hallisey</u> Jeremiah F. Hallisey Hallisey and Johnson, PC		
465 California Street, Suite 405 San Francisco, CA 94104-1812		
Telephone: (415) 433-5300 Email: jfhallisey@gmail.com		
Attorneys for William, Ming, and Fuguan O'Brien;		
Kye and Michael Heinstein; Clint Reilly; Karen Roberds and Anita Freeman; and William N. Steel		
FRANCIS O. SCARPULLA (SBN 41059)		
PATRICK B. CLAYTON (SBN 240191) LAW OFFICES OF FRANCIS O. SCARPULLA		
456 Montgomery Street, 17 th Floor San Francisco, CA 94104		
Tel: (415) 788-7210 Email: fos@scarpullalaw.com		
pbc@scarpullalaw.com		
Attorneys for GER HOSPITALITY, LLC and ADOLFO VERONESE FAMILY		
QUENTIN L. KOPP (SBN_25070) DANIEL S. MASON (SBN 54065)		
THOMAS W. JACKSON (SBN 107608) - 2 - USBC/NDCA NO. 19-30088 (DM)		

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1	FURTH SALEM MASON & LI LLP
2	640 Third Street, 2 nd Floor Santa Rosa, CA 95404-4445 Telephone: (707) 244-9422 Email:

- 3 -

1					
2	CERTIFICATE OF SERVICE				
3					
4	I, Karen J. Chedister, declare as follows:				
5	I am over the age of eighteen (18) years and not a party to the within action. My business				
6	address is 465 California street, Suite 405, San Francisco, CA 94104.				
7	On May 10, 2020, I served document(s) described as:				
8					
9	DECLARATION OF JEREMIAH F. HALLISEY, ESQ. IN SUPPORT OF JOINDER OF CERTAIN FIRE VICTIMS IN WILLIAM B. ABRAMS MOTION TO				
10	DESIGNATE IMPROPERLY SOLICITED VOTES PURSUANT TO 11 U.S.C. §§ 1125(B) AND 1126(E) AND BANKRUPTCY RULE 2019				
11	on the interested parties in this action as follows:				
12	BY E-MAIL/NEF: Service was accomplished through the Notice of Electronic Filing				
13	("NEF") for all parties and counsel who are registered ECF Users and those identified				
14	below:				
15	I declare under penalty of perjury under the laws of the United States of America that the				
16	above is true and correct. This declaration was executed on May 7, 2020 at San Francisco,				
17	California.				
18	/s/ Karen J. Chedister				
19	Karen J. Chedister, Esq.				
20					
21					
22					
23					
24					
25					
26					
27					
28					

EXHIBIT 1 TO

DECLARATION OF JEREMIAH F. HALLISEY, ESQ. IN SUPPORT OF JOINDER OF CERTAIN FIRE VICTIMS IN WILLIAM B. ABRAMS MOTION TO DESIGNATE IMPROPERLY SOLICITED VOTES PURSUANT TO 11 U.S.C. §§ 1125(B) AND 1126(E) AND BANKRUPTCY RULE 2019

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Karen Lynn Ingalls 1 108 Ivy Lane Calistoga, CA 94515 2 Claimant 3 4 UNITED STATES BANKRUPTCY COURT 5 NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION 6 7 Bankr. Case No. 19-30088 (DM) 8 In re: Chapter 11 (Lead Case) 9 PG&E CORPORATION, (Jointly Administrated) 10 -and-DECLARATION OF KAREN LYNN 11 **INGALLS** 12 PACIFIC GAS AND ELECTRIC COMPANY, 13 Debtors. 14 15 ☐ Affects PG&E Corporation ☐ Affects Pacific Gas and Electric Company 16 ☑ Affects both Debtors 17 All papers shall be filed in the lead case, 18 No. 19-30088 (DM) 19 20 21 22 I hereby declare under penalty of perjury that the following is true and correct to the best of 23 my knowledge, information, and belief: 24 I am a fire claimant in the above-referenced case. I incurred fire damage and losses at 1. 25 8811 Franz Valley School Road, Calistoga, CA during the Tubbs Fire. My Proof of Claim is number 26 85774, filed on October 21, 2019. I am not represented by an attorney in the PG&E matter. 27 28 DECLARATION OF KAREN LYNN INGALLS

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2.	As of May 6, 20	020, I had not	received the	Disclosure S	Statement, I	Ballots and	related
materials							
I dec	clare under penalty	of perjury pur	suant to the	Laws of the	State of Ca	lifornia tha	t, to the
	knowledge and afte				rue and cor	rect and tha	t this
declaration	was executed at \mathcal{U}	alistaga on I	May $\overline{\mathcal{L}}$, 2	020.			
	was executed at $$	Trylane	0	$\mathcal{L}_{\mathcal{L}}$	1	T	00-
				Lover	- Wan	Inga	W)
				Karen Ly	nn Ingalls,	Claimant	
		,					
			•	*			
*							
		DECLARATION					

EXHIBIT 2 TO

DECLARATION OF JEREMIAH F. HALLISEY, ESQ. IN SUPPORT OF JOINDER OF CERTAIN FIRE VICTIMS IN WILLIAM B. ABRAMS MOTION TO DESIGNATE IMPROPERLY SOLICITED VOTES PURSUANT TO 11 U.S.C. §§ 1125(B) AND 1126(E) AND BANKRUPTCY RULE 2019

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1	Debbie Pool 121 Penzance Ave, #152			
3	Chico, CA 95973 Claimant			
4 5	UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA			
6 7	In re:	O DIVISION		
8	PG&E CORPORATION,	Bankr. Case No. 19-30088 (DM) Chapter 11		
9	-and-	(Lead Case) (Jointly Administrated)		
11	PACIFIC GAS AND ELECTRIC COMPANY,	DECLARATION OF DEBBIE POOL		
12 13 14 15 16 17	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)			
19 20 21 22 23 24 25 26 27 28	I hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief: 1. I am a fire claimant in the above-referenced case. I incurred fire damage and losses at 9183 Skyway in Paradise, CA during the Camp Fire. My Proof of Claim is number 13959, filed on October 4, 2019. I amended my Proof of Claim on March 11, 2020, to remove Joseph M. Earley as my attorney.			

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- 2. I engaged Joseph M. Earley III to represent me in connection with my claims against Debtors. At the time I engaged Mr. Earley, I did not understand that Watts Guerra would also be representing me and managing my claim.
- 3. I have been urged and pushed to vote to approve the PG&E Plan of Reorganization since the beginning of February 2020. Attached as **Exhibit A** are true and correct copies of two emails urging me to accept the Plan and that I received in February 2020.
- 4. I told Watts Guerra that I was terminating their engagement on February 28, 2020, then again on February 29, 2020, and a third time on March 3, 2020. I spoke to Guy Watts on March 9, 2020. He asked why I was terminating the relationship, so I gave him several reasons. He raised his voice and argued with me. I felt rudely treated. I did not get confirmation that they had closed my file until April 6, 2020.
- 5. Although Guy Watts told me he would close my file on March 12, 2020, I continued receiving calls, e-mails, and texts URGING me to vote yes. In total, there were seven texts, twelve calls, and three emails, all about voting through their portal even though I was no longer a client. Attached as **Exhibit B** is a true and correct copy of an email I received at 8:23 AM urging me to accept the Plan. Attached as **Exhibit C** is a true and correct copy of the list of phone messages I received from Watts Guerra urging me to vote to approve the Plan. Attached as **Exhibit D** are true and correct copies of the text messages I received urging me to vote to approve the Plan.
- 6. To my knowledge, at no time while Watts Guerra was representing me did I receive any written or verbal disclosures from Watts Guerra regarding its line of credit or financing arrangements with Centerbridge Partners or Apollo Capital.

I declare under penalty of perjury pursuant to the Laws of the State of California that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct and that this declaration was executed at 11 AM on May 7, 2020.

/s/ Debbie Pool

Debbie Pool

Claimant

EXHIBIT A

Vote Solicitation Prior to March 31

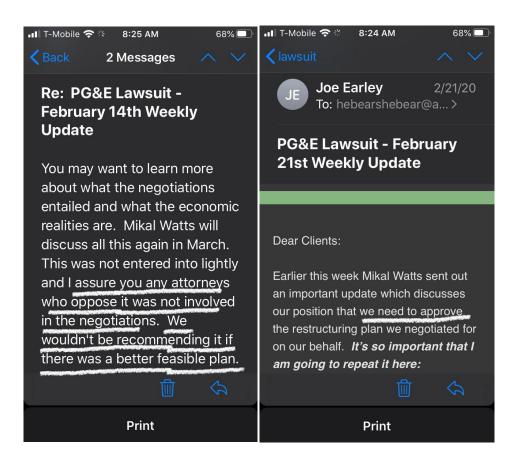


EXHIBIT B

Vote Solicitation on March 31

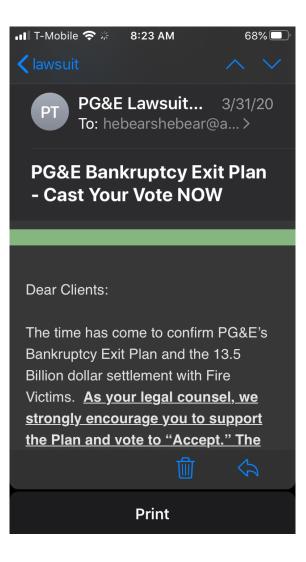


EXHIBIT C

Voicemail List

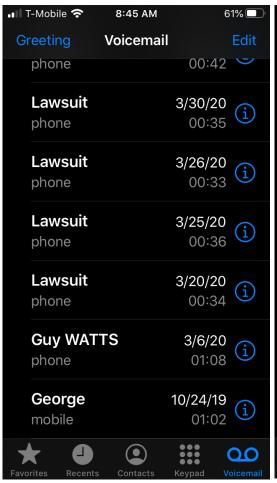
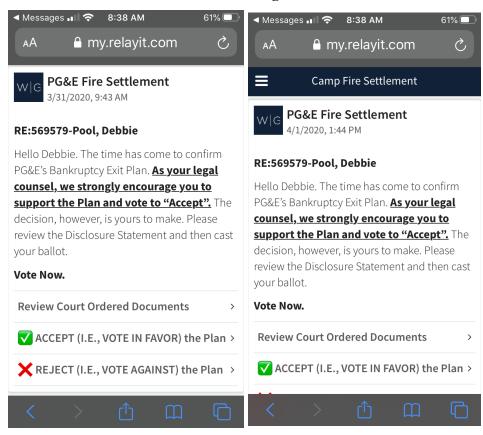




EXHIBIT D

Text Messages



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