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

15 **In re:**

16 **PG&E CORPORATION**

17 **-and-**

18 **PACIFIC GAS AND ELECTRIC**
19 **COMPANY,**

Debtors.

- 20 Affects PG&E Corporation
21 Affects Pacific Gas and Electric Company
22 Affects both Debtors

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

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**NOTICE OF WITHDRAWAL OF
OBJECTION TO PLAN
CONFIRMATION BY THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
[Relates to Dkt. Nos. 7306 and 7509]**

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1 **PLEASE TAKE NOTICE** that on May 15, 2020, the Official Committee of Tort
2 Claimants (the “**TCC**”) filed an objection (“**Objection**”) to confirmation of the plan proposed by
3 PG&E Corporation and Pacific Gas and Electric Company (collectively, the “**Debtors**”) and the
4 Shareholder Plan Proponents [Dkt. No. 7306] (the “**Plan**”), based on five issues listed on Exhibit 2
5 to the Objection;

6 **PLEASE TAKE FURTHER NOTICE** that on May 22, 2020, the TCC filed a reply brief
7 (the “**Reply**”) responding to plan objections file by other parties in interest, addressing the TCC’s
8 position and concerns pertaining to responsive language that may appear in a future amended
9 version of the Proposed Findings of Fact, Conclusions of Law, and Order Confirming Debtors’ and
10 Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization filed on May 26, 2020 [Dkt. No.
11 7581] (the “**Confirmation Order**”), or in any amended Plan; and

12 **PLEASE TAKE FURTHER NOTICE** that the TCC and the Debtors have resolved all
13 issues listed on Exhibit 2 to the Objection, including issue number 4, regarding “the amount of the
14 Reorganized Debtors’ common stock to be transferred to the Fire Victim Trust is determined by a
15 calculation involving the Debtors’ ‘Normalized Estimated Net Income’ (‘**NNI**’) for 2021”; and

16 **PLEASE TAKE FURTHER NOTICE** that the TCC hereby withdraws its Objection; and

17 **PLEASE TAKE FURTHER NOTICE** that the TCC reserves all rights with respect to any
18 amended version of the Confirmation Order or Plan that the Debtors may file, including but not
19 limited to any language that pertains to the issues raised in the TCC’s Reply, and any other plan
20 objections raised by other parties in interest.

21 Dated: June 12, 2020

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23 BAKER & HOSTETLER LLP

24 By: /s/ Robert A. Julian
25 Robert A. Julian

26 *Counsel to the Official Committee of Tort*
27 *Claimants*