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

18 **In re:**

19 **PG&E CORPORATION,**

20 **- and -**

21 **PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

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

25 ** 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)

**DEBTORS' WITNESS LIST IN
CONNECTION WITH HEARING ON
CONFIRMATION OF THE DEBTORS' AND
SHAREHOLDER PROPONENTS' JOINT
CHAPTER 11 PLAN OF REORGANIZATION**

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company, as debtors and
 2 debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases, hereby
 3 submit the following list of witnesses who will provide affirmative testimony through declaration at
 4 the hearing to consider confirmation of the *Debtors’ and Shareholder Proponents’ Joint Chapter 11*
 5 *Plan of Reorganization Dated March 16, 2020* [Docket No. 6320] (as it may be amended, modified or
 6 supplemented from time to time, and together with any exhibits or schedules thereto, the “**Plan**”)¹
 7 pursuant to the direction from the Court at the May 19, 2020 pre-confirmation status conference that
 8 the Debtors identify their witnesses and provide a brief summary of the testimony each witness intends
 9 to offer.

10 1. **Jason P. Wells.** Mr. Wells is the Executive Vice President and Chief Financial Officer
 11 for PG&E Corp. Mr. Wells will provide testimony regarding, among other things, the facts
 12 demonstrating the satisfaction by the Plan and the Plan Proponents of each of the requirements of
 13 section 1129 of the Bankruptcy Code (other than those specifically identified below to be addressed by
 14 other declarants) and support for the Public Entities Settlement and OII Wildfire Settlement.

15 2. **Ken Ziman.** Mr. Ziman is a Managing Director in the Restructuring Group at Lazard
 16 Frères & Co. LLC, an investment banking firm. Mr. Ziman will provide testimony regarding, among
 17 other things, the emergence financing contemplated in connection with the Plan.

18 3. **John Boken.** Mr. Boken is a Managing Director in the restructuring group at
 19 AlixPartners, LLP. Mr. Boken will provide testimony regarding, among other things, the Debtors’
 20 Claims reconciliation and analysis, the Plan’s satisfaction of the requirements of section 1129(a)(7) of
 21 the Bankruptcy Code, the Financial Projections, and the adequacy of the emergence financing in
 22 connection with the Plan.

23 4. **Christina Pullo.** Ms. Pullo is a Vice President of Global Corporate Actions, at Prime
 24 Clerk LLC. Ms. Pullo will provide testimony regarding, among other things, the solicitation of votes
 25 and the tabulation of Ballots cast on the Plan.

28 ¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the Plan.

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1 The Debtors reserve the right to amend the witness list to add a witness the Debtors will or may
2 call at the Confirmation Hearing, or to state that any witness previously disclosed will testify to
3 additional subject matters. In addition, the Debtors reserve the right to call (i) any witness identified
4 in the witness list of any other party, (ii) additional witnesses necessary to respond to or rebut the
5 testimony of any witness called or designated by another party as well as any testimony elicited on
6 cross-examination, and (iii) additional witnesses that may be necessary to establish the authenticity
7 and/or admissibility of documents.

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9 Dated: May 21, 2020
10 New York, New York

11 **WEIL, GOTSHAL & MANGES LLP**
12 **KELLER BENVENUTTI KIM LLP**

13 By: /s/ Stephen Karotkin
14 Stephen Karotkin

15 *Attorneys for Debtors and Debtors in Possession*
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