

# **EXHIBIT J**

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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In Re:  
PG&E CORPORATION  
and  
PACIFIC GAS & ELECTRIC COMPANY,  
Debtors.

Bankr. Case No. 19-30088-DM  
SECOND NOTICE OF VOTING  
PROCEDURE IRREGULARITIES

1 This notice of procedural irregularities in the ongoing process of the fire victims  
2 voting on PG&E's proposed plan is filed by the undersigned counsel for many (1,021)  
3 persons and businesses harmed by the Atlas (Napa), Redwood Valley (Mendocino), and  
4 Camp (Paradise) fires.

6 On May 5, 2020, the undersigned filed in this Court a Notice of Plan Voting  
7 Procedure Irregularities, with ten exhibits, setting forth six different ways law firms  
8 favoring acceptance of the plan made it harder for their clients to vote to reject the plan and  
9 identifying problems of missing, late, and duplicate ballots. (Doc. 7069)

11 Since then, two additional devices have come to our attention by which attorneys  
12 favoring acceptance of the plan made it harder for fire victims to vote to reject the plan.

- 13 • A law firm voting to accept the plan without its client's knowledge or consent  
14 and contrary to the client's desire to vote to reject (Exhibit 1),
- 16 • A law firm requiring its clients to contact the firm if they wanted to vote to  
17 reject the plan and then attempting to convince the clients to change their  
18 vote to "accept" (Exhibit 2).

20 The first notice of procedural irregularities provided examples of missing, late, and  
21 duplicate ballots. This notice supplements these problems with additional irregularities  
22 noted by fire victims on letters and applications to the Court and on social media  
23 platforms, including:

- 25 • Fire victims not receiving solicitation materials, including ballots, at all  
26 (Application of Ms. Wallace, 5/11/20, Doc. 71410; Exhibit 3),
- 27 • Solicitation materials not received by fire victims until the end of April 2020  
28 (Exhibit 4),

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- Solicitation packages sent to fire victims with cover letters from the wrong attorneys (Exhibit 5), and
- Much suspicion and distrust by fire victims of the Master Ballot system by which attorneys solicit, receive, and report votes of their clients (examples Exhibits 6, 7, 8).

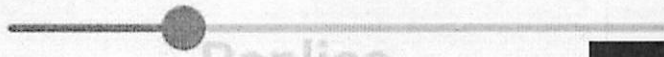
These materials are provided to the Court for its information and made part of the record of this case.

Dated: May 13, 2020

/s/ Thomas Tosdal  
Attorney

# Exhibit 1

Ringtone



Replies

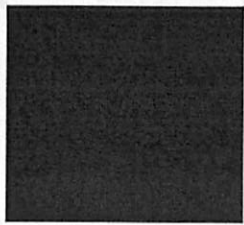
49m Like Reply

I know someone who wants to vote No but his attorney told him he already voted Yes for him! How can they do this!?! I received my voting package to vote for myself and it will be a Big NO!

13m Like Reply

# Exhibit 2

[REDACTED]



[REDACTED]



**Wildfire Victims**



## **Settlement Discussion Group**

28 mins •


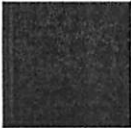
Called our Attorneys yesterday (Baron & Budd)-my wife Judie & I will be voting NO.Final answer.Attorney tried talking us out of it.Not gonna happen.

[REDACTED]



# Exhibit 3

## Posts



I amended my 3 claims on 3/12/30 and waited patiently for voting materials that did not come.

I called a couple weeks later and spoke with a very nice woman who said she would send me an email, which I never got.

I tried calling multiple times after that, but the number wasn't working, so I sent a message from their website and finally received a response on April 29, 20

All that was sent were 3 voter ID numbers.

Ad Like Reply

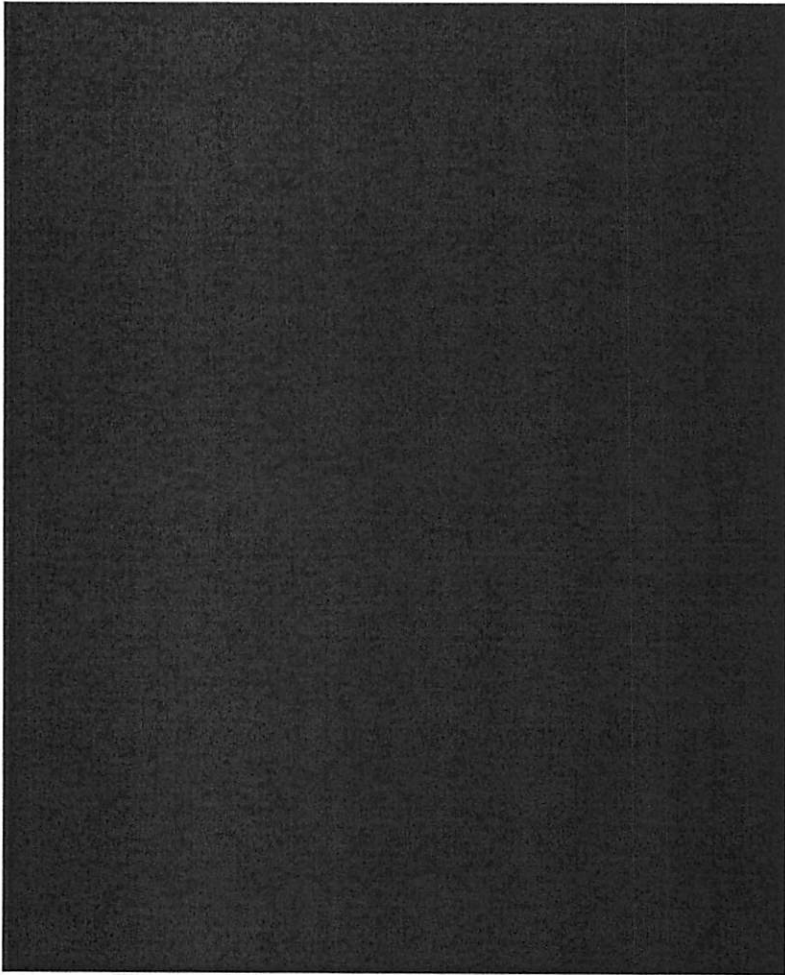


# Exhibit 4

[redacted]

[redacted]


I received my packet less than 2 weeks before the vote is due. Because I don't have an attorney, it's up to me to read these documents and seek explanations. Not sure how anyone could read and understand the disclosures with enough time to mail back a vote. If courts have calendar deadlines, why was the mailing of these disclosures not held to the same standards of timeliness?



# Exhibit 5

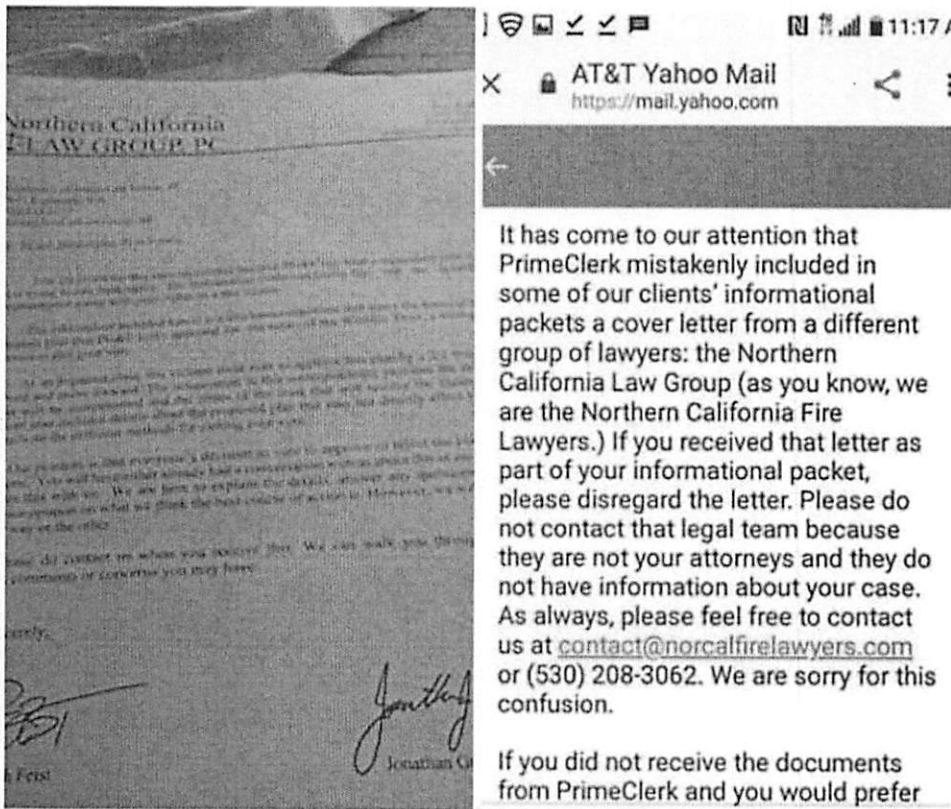
← Posts



 **Wildfire** ⋮  
**Bankruptcy Resource Page**  
 7 hrs • 🌐

Please share around. This may have caused some confusion and unnecessary anxiety and phone calls...

My disclosure package contained a cover letter from a law firm that I am not signed with. It seems there was a mix up at Prime Clerk and they allocated the wrong cover letters to some claimants (due to similar firm names). I have included a photo of the cover letter received, and an email notice from my actual attorney:

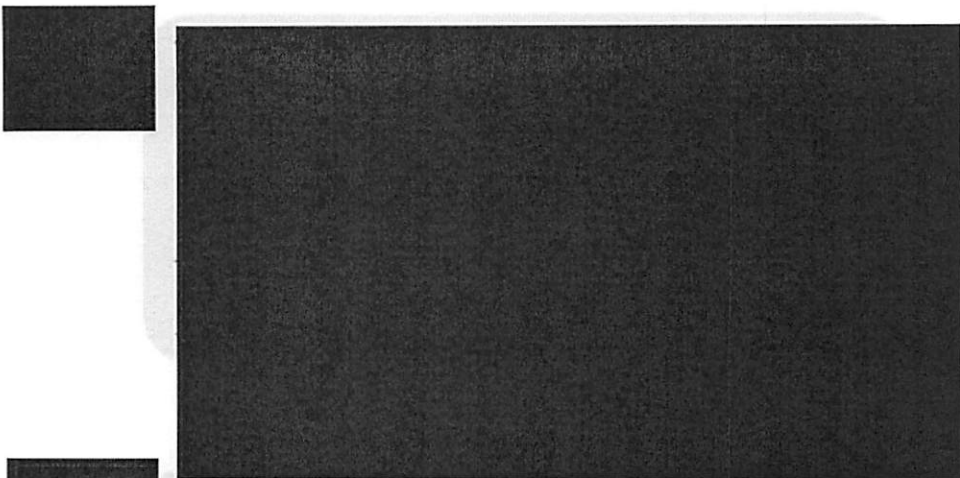


# Exhibit 6

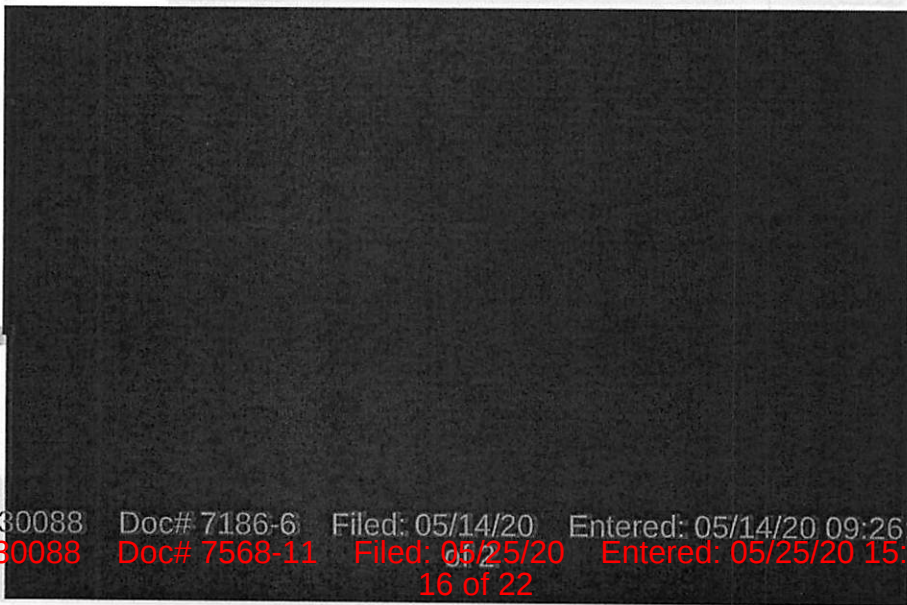
← Posts



11h Like Reply



I think that the vote should have never went through the lawyers.. it should have be mailed out to the clients and sent in by mail . I believe that the votes were tampered with and falsely entered and how could we know for sure that our votes are entered correctly.. I knew that we weren't going to be treated fairly.. 😞😞





# Exhibit 7



1 [sad face emoji]

5 Comments

Like

Comment

[Redacted] is [sad face emoji] feeling annoyed. 32 mins • [private icon]

Prime clerk said contact my attorney for my ballot # ... since I haven't recieved my ballot yet.... my attorney gave the wrong number but states that's the only number prime clerk has given. I need to vote on Prime clerk since my attorney is doing a master ballot. This is such crap. If this goes thru with all the mishaps and confusion we our votes didnt matter anyway....

# Exhibit 8

X [paperclip] [arrow] [dots]

To dennis\_montali@canb.uscourts.gov [dropdown]

From [redacted]

Voting

To the Hon Judge Montali;

Your Honor,

I have seen a lot of things in my lifetime and I do not trust these attorneys. There is absolutely no transparency. How does anyone know the vote is honest when attorneys are running the show.

I will not believe any voting system that doesn't have transparency sir. Especially in this lawsuit. How will we know if our votes were accurately counted? Or that the attorneys didn't vote for us? I don't want anyone to vote for me except me. I have been trying to vote for over a week. This is an unacceptable situation that could have been a much simpler process if the votes were handled only by fire survivors. It's our vote. No one else's.

I have tried to reach the prime clerk office for casting my vote. They sent me papers from another attorney. I do not, as of today, May 7, have a ballot. I will be very upset if I cannot vote. I want to vote, and it's my right. I earned it.

Respectfully,

[redacted signature]

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

In Re:  
PG&E CORPORATION  
and  
PACIFIC GAS & ELECTRIC COMPANY,  
Debtors.

Bankr. Case No. 19-30088-DM  
Chapter 11  
**CERTIFICATE OF SERVICE**

I, Ma Teresa Ferrer, do declare and state as follow:

- 1. I declare that I am over the age of 18 years, and not a party to the action. I am employed in the County of San Diego, California. My business address is 777 S. Highway 101, Ste 215, Solana Beach, CA 92075.

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2. I certify that on May 14, 2020, I electronically filed with the Clerk of Court using the CM/ECF system, which will electronically serve all parties in this action, the following documents:

**SECOND NOTICE OF VOTING PROCEDURE IRREGULARITIES**

I declare under penalty of perjury the foregoing is true and correct. Executed on this 14th day of May 2020 in Solana Beach, California.

/s/ Ma Teresa Ferrer  
Ma Teresa Ferrer