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17 dmason@fsmllaw.com
18 tjackson@fsmllaw.com

19 *[Attorneys for clients as listed on signature page]*

20 UNITED STATES BANKRUPTCY COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 In re:
24 PG&E CORPORATION,
25 - and -
26 PACIFIC GAS AND ELECTRIC
27 COMPANY,
28 Debtors.

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)

(Jointly Administered)

**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**

Date: May 12, 2020
Time: 10:00 a.m.:
Place: Courtroom 17, 450 Golden Gate Ave.,
16th Floor, San Francisco, CA

I, Jeremiah F. Hallisey, declare as follows:

1. I am a member in good standing of the State Bar of California and am the attorney

1 of record for claimants/fire victims William O'Brien, Ming O'Brien, Fuguan O'Brien; Michael
2 Heinstein, Kye Heinstein, Karen Roberds. Anita Freeman; William N. Steel, and Clinton Reilly in
3 this proceeding.

4 2. I have personal knowledge of the facts stated herein and I could and would
5 competently and truthfully testify to those facts if called as witness.

6 3. This Declaration is submitted in support of the Joinder of Certain Fire Victims in
7 William B. Abrams Motion to Designate Improperly Solicited Votes Pursuant to 11 U.S.C. §§
8 1125(B) and 1126(E) and Bankruptcy Rule 2019 14 3.

9 4. Attached hereto as **Exhibit 1** is a true and correct copy of the Declaration of Karen
10 Lynn Ingalls, *Pro Per* Claimant and Fire Victim, dated May 7, 2020. Attached hereto as **Exhibit**
11 **2** is a true and correct copy of the Declaration of Debbie Pool, *Pro Per* Claimant and Fire Victim,
12 dated May 7, 2020.

13 I declare under penalty of perjury that the foregoing is true and correct. Executed on May
14 10, 2020 at San Francisco California.

15
16 /s/ Jeremiah F. Hallisey
17 Jeremiah F. Hallisey
18 Hallisey and Johnson, PC
19 465 California Street, Suite 405
20 San Francisco, CA 94104-1812
21 Telephone: (415) 433-5300
22 Email: jfhallisey@gmail.com

23 Attorneys for William, Ming, and Fuguan O'Brien;
24 Kye and Michael Heinstein; Clint Reilly; Karen
25 Roberds and Anita Freeman; and William N. Steel

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Attorneys for GER HOSPITALITY, LLC and
ADOLFO VERONESE FAMILY

QUENTIN L. KOPP (SBN 25070)
DANIEL S. MASON (SBN 54065)
THOMAS W. JACKSON (SBN 107608)

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Attorneys for Ken Born, Christine Born, Cathy FERENCE, William FERENCE, Allen Goldberg, Robert Johnson, Patricia Goodberg, Paul Goodberg, Terence Redmond, Melissa Redmond, Sonoma Court Shops, Inc., and Rita Godward

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CERTIFICATE OF SERVICE

I, Karen J. Chedister, declare as follows:

I am over the age of eighteen (18) years and not a party to the within action. My business address is 465 California street, Suite 405, San Francisco, CA 94104.

On May 10, 2020, I served document(s) described as:

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

on the interested parties in this action as follows:

BY E-MAIL/NEF: Service was accomplished through the Notice of Electronic Filing (“NEF”) for all parties and counsel who are registered ECF Users and those identified below:

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct. This declaration was executed on May 7, 2020 at San Francisco, California.

/s/ Karen J. Chedister

Karen J. Chedister, Esq.

EXHIBIT 1 TO

**DECLARATION OF JEREMIAH F. HALLISEY, ESQ. IN SUPPORT OF
JOINER 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**

1 Karen Lynn Ingalls
2 108 Ivy Lane
3 Calistoga, CA 94515

4 *Claimant*

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

8 In re:

9 PG&E CORPORATION,

10 -and-

11 PACIFIC GAS AND ELECTRIC
12 COMPANY,

13 Debtors.

- 14 Affects PG&E Corporation
15 Affects Pacific Gas and Electric Company
16 Affects both Debtors

17
18 * *All papers shall be filed in the lead case,*
19 *No. 19-30088 (DM)*
20

Bankr. Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administrated)

**DECLARATION OF KAREN LYNN
INGALLS**

21
22
23 I hereby declare under penalty of perjury that the following is true and correct to the best of
24 my knowledge, information, and belief:

25 1. I am a fire claimant in the above-referenced case. I incurred fire damage and losses at
26 8811 Franz Valley School Road, Calistoga, CA during the Tubbs Fire. My Proof of Claim is number
27 85774, filed on October 21, 2019. I am not represented by an attorney in the PG&E matter.

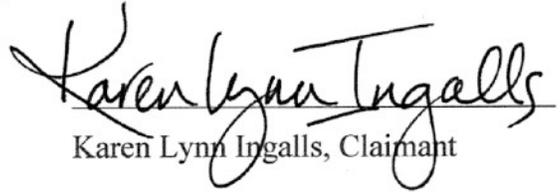
28 **DECLARATION OF KAREN LYNN INGALLS**

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1
2 2. As of May 6, 2020, I had not received the Disclosure Statement, Ballots and related
3 materials

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

7 108 Iny Lane

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Karen Lynn Ingalls, Claimant

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DECLARATION OF KAREN LYNN INGALLS

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EXHIBIT 2 TO

**DECLARATION OF JEREMIAH F. HALLISEY, ESQ. IN SUPPORT OF
JOINER 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**

1 Debbie Pool
121 Penzance Ave, #152
2 Chico, CA 95973
3 *Claimant*

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

7 In re:

8 PG&E CORPORATION,

9 -and-

10 PACIFIC GAS AND ELECTRIC
11 COMPANY,

12 Debtors.

- 13 Affects PG&E Corporation
14 Affects Pacific Gas and Electric Company
15 Affects both Debtors

16 * *All papers shall be filed in the lead case,*
17 *No. 19-30088 (DM)*
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Bankr. Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administrated)

DECLARATION OF DEBBIE POOL

21 I hereby declare under penalty of perjury that the following is true and correct to the best
22 of my knowledge, information, and belief:

23 1. I am a fire claimant in the above-referenced case. I incurred fire damage and
24 losses at 9183 Skyway in Paradise, CA during the Camp Fire. My Proof of Claim is number
25 13959, filed on October 4, 2019. I amended my Proof of Claim on March 11, 2020, to remove
26 Joseph M. Earley as my attorney.
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DECLARATION OF DEBBIE POOL

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EXHIBIT A

Vote Solicitation Prior to March 31

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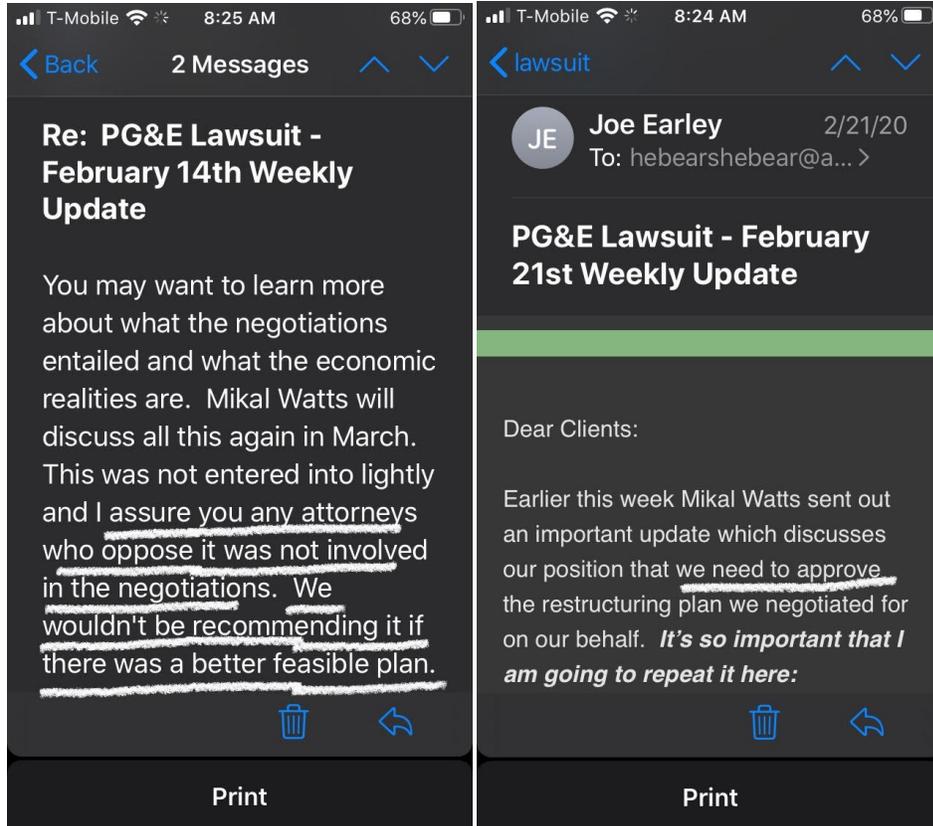


EXHIBIT B

Vote Solicitation on March 31

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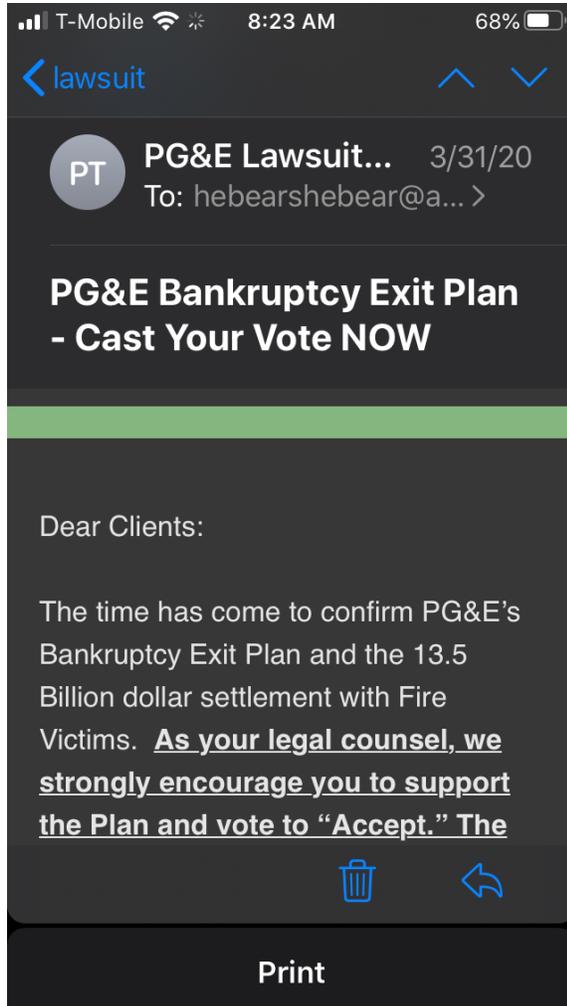
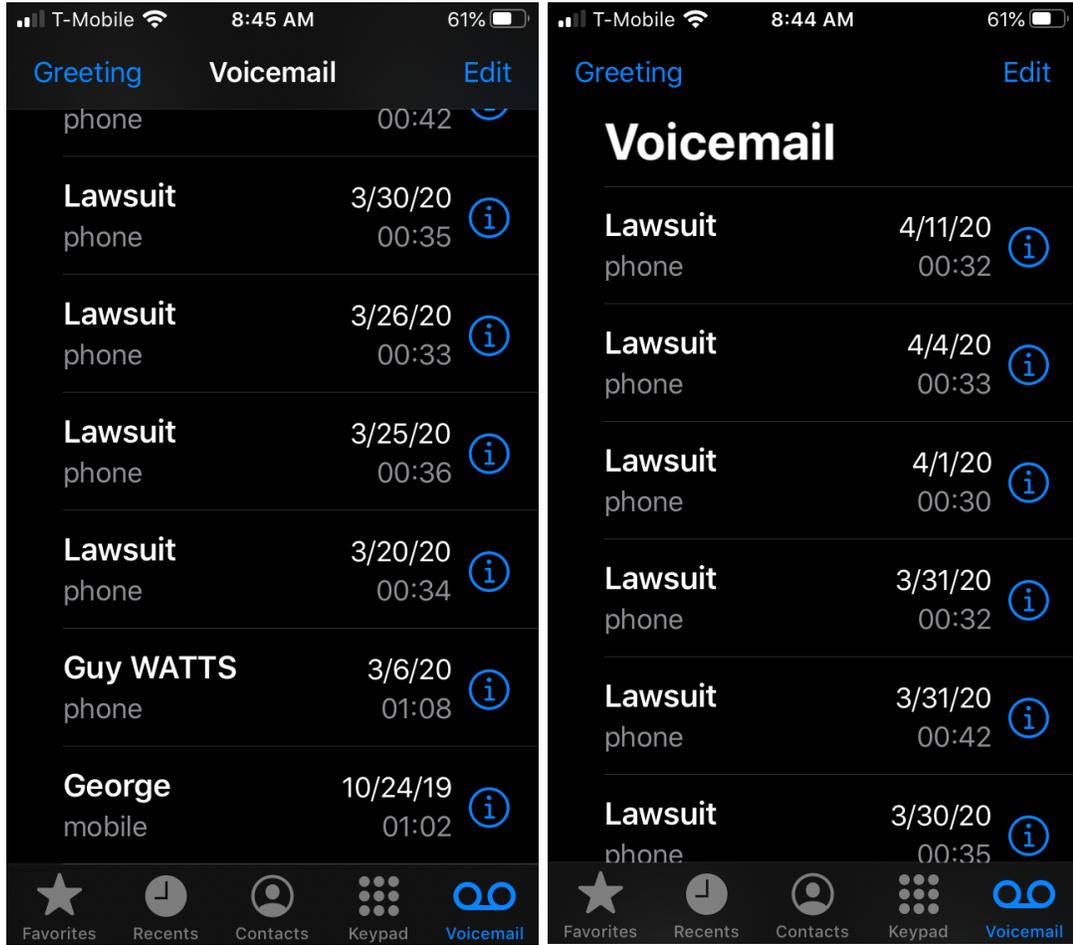


EXHIBIT C

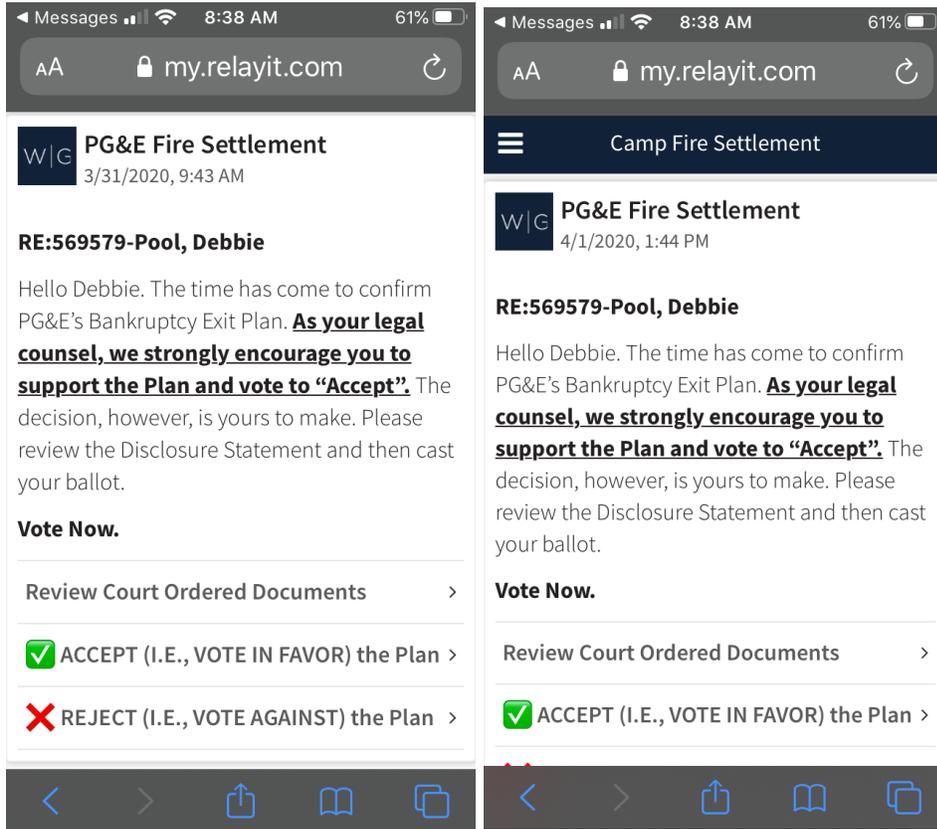
Voicemail List



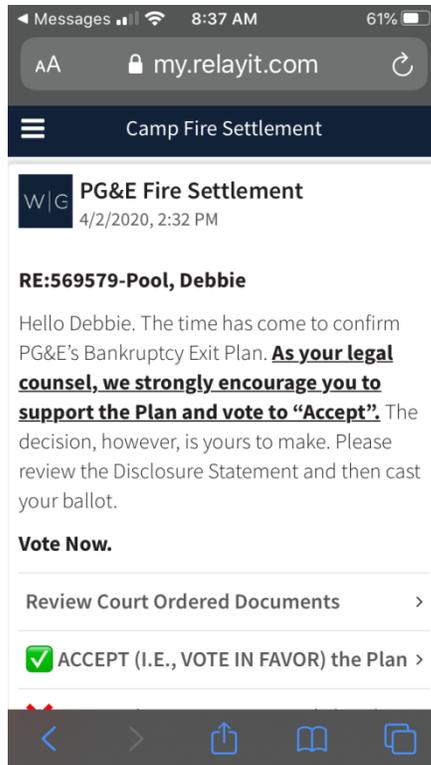
DECLARATION OF DEBBIE POOL

EXHIBIT D

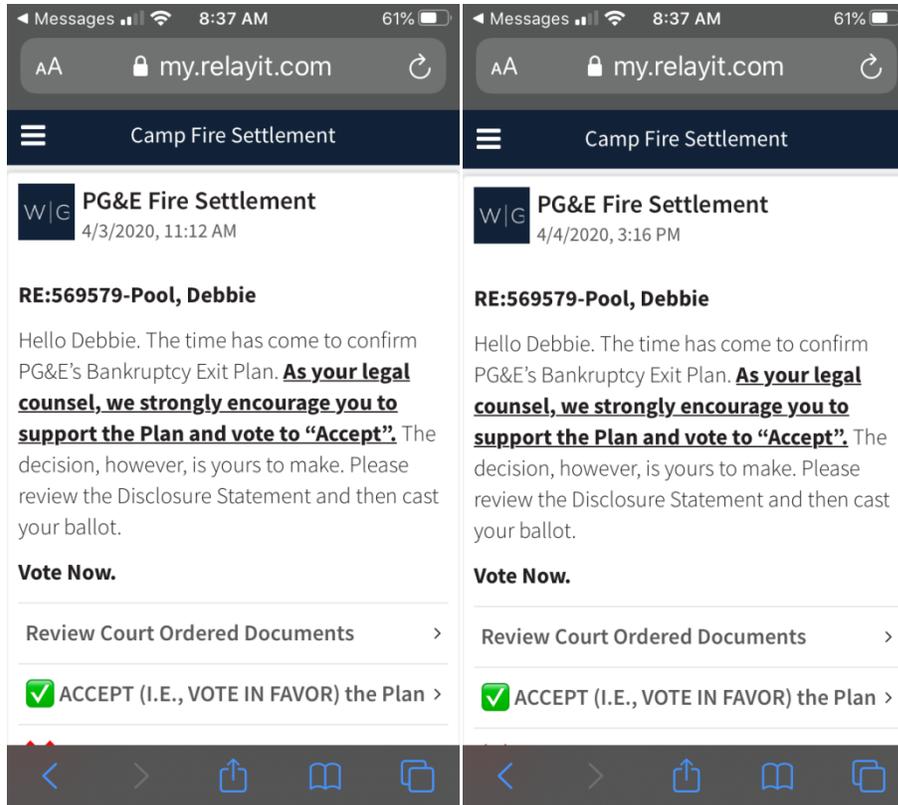
Text Messages



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DECLARATION OF DEBBIE POOL



DECLARATION OF DEBBIE POOL