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Approximately 4,300 timely-filed claims

12
13 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
14 **SAN FRANCISCO DIVISION**

15 In re:) Bankruptcy Case
16 PG&E CORPORATION and) No. 19-30088 (DM)
17 PACIFIC GAS AND ELECTRIC)
COMPANY,) Chapter 11
) (Lead Case) (Jointly Administered)
18 Debtors.) **JOINDER BY 11,300 INDIVIDUAL FIRE**
) **VICTIM CLAIMANTS TO DOC. 6973,**
19 Affects PG&E Corporation) **REPLY TO DOC# 6944, REGARDING**
 Affects Pacific Gas and Electric Company) **ABRAMS MOTION TO DESIGNATE**
20 Affects both Debtors) **IMPROPERLY SOLICITED VOTES**
21 *All papers shall be filed in the Lead Case,)
No. 19-30088 (DM)) Date: TBD
22) Time: TBD
23) Judge: Dennis J. Montali
24) Place: Courtroom 17, 16th Floor
25) 450 Golden Gate Avenue
San Francisco, CA 94102
[Re: Dkt. Nos. 6799, 6944, 6973]

26 TO THE COURT, ALL INTERESTED PARTIES, AND ALL ATTORNEYS OF RECORD
27 The Singleton Law Firm, APC, Marshack Hays LLP, and their co-counsel, represent
28 approximately 7,000 victims of the 2015 Butte Fire, the 2017 North Bay Fires, and the 2018 Camp

1 Fire. Together, the Frantz Law Group, APLC, Bridgford, Gleason & Artinian, and their co-counsel,
2 represent approximately 4,300 victims of the 2017 North Bay Fires and the 2018 Camp Fire.
3 Collectively, the aforementioned firms represent at least 11,300 unique claimants who timely-filed
4 Proofs of Claim by the Bankruptcy Court's Bar Date.

5 **BACKGROUND**

6 On April 20, 2020, William Abrams ("Abrams") filed his Motion to Designate Improperly
7 Solicited Votes Pursuant to 11 U.S.C. §1125(B) and 1126(E) and Bankruptcy Rule 2019 ("Motion")
8 (Dk. No. #6799), and an *Ex Parte* Motion Pursuant to B.L.R. 9006-1 Requesting Order Shortening
9 Time for Hearing (Dk. No. 6798). The Motion sought an order declaring that the votes in favor of
10 the Plan for Reorganization ("Plan") cast by more than 13,000 individual fire victims represented by
11 the law firm of Watts Guerra were improperly solicited. The affect of the relief sought by Abrams
12 would be that these 13,000+ votes would not be counted in the overall vote on the Plan.

13 Watts Guerra filed its Preliminary Opposition to Abrams' Motion the same day (Dk. No.
14 6801) ("Opposition"), and this Court denied Abrams' Ex Parte Motion on the same day (Dk. No.
15 6800).

16 Attorney Steven Kane, on behalf of Karin Gowins (Dk. No. 6944), then filed a joinder to
17 Abrams' Motion ("Joinder"), and Abrams himself subsequently filed a Response (Dk. No. 6946)
18 ("Response"), a second *Ex Parte* Motion for Order Shortening Time (Dk. No. 6963), and a
19 Declaration in Support of the same. *See*, Dk. No. 6964.

20 On April 28, 2020, Watts Guerra filed a Reply to the Joinder by Kane/Gowins and Abrams'
21 *Ex Parte* Motion ("Reply"). *See*, Dk. No. 6973.

22 On April 29, 2020, this Court denied Mr. Abrams' second Ex Parte Motion. *See*, Dk. No.
23 6876.

24 **JOINDER**

25 While the issue of whether or not the Watts Guerra firm provided its clients with adequate
26 notice of a potential conflict solely concerns the Watts Guerra firm and its clients, the attempt to
27 disenfranchise over 13,000 victims of these wildfires who have already exercised their right to vote
28 on Debtors' Plan directly affects all victims. Accordingly, the 11,300 individual wildfire victims

1 represented by undersigned counsel join the Reply and objection filed by Watts Guerra to Gowins’
2 and Abrams’ filings.

3 Every fire victim has the right to vote however they chose on the Debtors’ Plan. Thus far,
4 the overwhelming majority of individual fire victims who have voted have cast their votes in favor
5 of the Debtors’ Plan. As set forth in the Joint Status report filed on April 28 by attorneys who
6 represent over 31,000 individual fire victims, of the 20,501 victims represented by these attorneys
7 who had voted, 20,229 had voted to accept the plan, while only 272 had voted against. *See*, Dkt #
8 345. This is an acceptance rate of 98.67%.

9 While the overwhelmingly majority of victims support the Plan, however, there is a very
10 small – but very vocal – minority who oppose it.

11 Unfortunately, this small opposition group has resorted to disseminating false information in
12 an attempt to mislead fire victims, most notably by claiming that there is a “back-up” plan that will
13 pay the fire victims \$13.5 billion in cash if they reject the current Plan.¹

14 This is simply false. The only operative plan is the current Plan, which has (1) a court
15 approved disclosure statement that went through rigorous scrutiny before being disseminated to fire
16 victims, and (2) the bankruptcy court’s approval to be sent out to fire victims for a vote.

17 The only other plan that has been submitted and approved by this Court is the “contingency
18 plan” which calls for PG&E’s assets to be sold off in pieces in a bankruptcy sale. *See*, Amended
19 Order of Judge Montali, signed April 24, 2020, Dkt # 6937.

20 There is no bankruptcy court approved consumer owned utility plan that will somehow
21 magically conjure the \$59 billion in financing within 60 days that is needed in order to enable PG&E
22 to emerge from bankruptcy by June 30 and pay the individual fire victims \$13.5 billion in cash by
23 September 30, 2020.²

25 ¹ In addition to posting on social media, this group has also deliberately spread false information
26 to media outlets across the United States in an attempt to achieve earned media designed to mislead
27 fire victims.

28 ² Falsely asserting that another Plan exists is not only unethical, it is also a violation of the law.
While a soliciting party may react to and present contrary views regarding a court-approved
disclosure statement, it may not present or suggest an alternative plan which has not been subject to

1 Faced with losing the vote overwhelmingly despite their disinformation campaign, this
2 minority group of Plan opponents now seeks to disenfranchise over 13,000 of their fellow fire
3 victims who do not agree with them.

4 This would affect not only those 13,000 fire victims whose votes would not be counted, but
5 also the vast majority of fire victims who support the plan. More importantly, it would be a
6 miscarriage of justice. If any group deserves to have their voices heard in this process, it is the
7 victims themselves.

8 While the bankruptcy system is far from perfect, it allows the victims to vote on whether to
9 approve the ultimate plan. It would violate both clearly established bankruptcy law and basic notions
10 of fairness if a minority group is able to impose their will on that of the overwhelming majority by
11 disenfranchising a large number of fire victims.

12 Respectfully submitted,

13 MARSHACK HAYS, LLP

14 Dated: April 28, 2020

15 By: /s Richard Marshack
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22 Attorneys for approximately 11,300 Individual Fire
23 Victim Claimants

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25
26
27
28 court scrutiny regarding adequacy of disclosure. *In re Apex Oil Co.*, 111 B.R. 245, 249 (Bankr. E.D. Mo. 1990).

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

15 In re)	Case No. 19-30088 (DM)
16 PG&E CORPORATION,)	Chapter 11
17 and)	(Lead Case--Jointly Administered)
18 PACIFIC GAS AND ELECTRIC)	CERTIFICATE OF SERVICE
19 COMPANY)	Date: TBD
20 Debtors)	Time: TBD
21 Affects:		Place: United States Bankruptcy Court
22 <input type="checkbox"/> PG&E Corporation)	Courtroom 17, 16th Floor
23 <input type="checkbox"/> Pacific Gas & Electric Company)	San Francisco, CA 94102
24 <input checked="" type="checkbox"/> Both Debtors)	
25 *All papers shall be filed in the Lead Case,		
26 No. 19-3008 (DM)		

27 I am employed in San Diego County. I am over the age of 18 and not a party to this action.
28 My business address is 450 A Street, 5th Floor, San Diego, CA 92101.

///

1 On April 29, 2020, I served the foregoing document(s), described as:

2 **1. JOINDER BY 11,300 INDIVIDUAL FIRE VICTIM CLAIMANTS TO DOC.**
3 **6973, REPLY TO DOC# 6944, REGARDING ABRAMS MOTION TO**
4 **DESIGNATE IMPROPERLY SOLICITED VOTES**

5 by placing the original a true copy thereof, by the following means to the persons as
6 listed below:

7 **ECF SYSTEM** On April 29, 2020, I checked the CM/ECF docket for this bankruptcy case or
8 adversary proceeding and determined that the following person(s) are on the Electronic Mail
9 Notice List to receive ECF transmission at the email address(es) indicated below:

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I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed on April 29, 2020, at San Diego, California.

s/Jesus Munoz
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