

1 Ronald L.M. Goldman, Esq. (State Bar No. 33422)  
2 *rgoldman@baumhedlundlaw.com*  
3 Matthew P. French, Esq. (State Bar No. 327814)  
4 *mfrench@baumhedlundlaw.com*  
5 **BAUM HEDLUND ARISTEI & GOLDMAN, P.C.**  
6 10940 Wilshire Boulevard, Suite 1600  
7 Los Angeles, California 90024  
8 Telephone: (310) 207-3233  
9 Facsimile: (310) 820-7444

10 *Attorneys for Creditors,*  
11 *Majesti Mai Bagorio, et al.*

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

15 **In re:**

16 **PG&E CORPORATION,**

17 **–and –**

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

20 **Debtors.**

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

24 *\*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)

**JOINDER BY BAUM HEDLUND  
ARISTEI GOLDMAN CAMP FIRE  
VICTIM CLIENTS IN MOTION OF  
WILLIAM B. ABRAMS PURSUANT TO  
FEDERAL RULE OF BANKRUPTCY  
PROCEDURE 2004 FOR ENTRY OF AN  
ORDER AUTHORIZING DISCOVERY  
AND HEARINGS REGARDING THE  
ACTS AND CONDUCT OF JAMS  
NEUTRALS GIVEN NEW EVIDENCE  
[Doc. No. 12766]**

**Response Deadline:** September 13, 2022

**Hearing If Order Granted:**  
September 27, 2022 (Pacific Time) or as  
determined by the Court

1 **TO THE CLERK OF THE ABOVE-ENTITLED COURT, THE DEBTORS AND THEIR**  
2 **ATTORNEYS OF RECORD, UNITED STATES TRUSTEE, AND OTHER INTERESTED**  
3 **PARTIES:**

4 Claimants Majesti Mai Bagorio, et al. (collectively, “Baum Hedlund Aristei Goldman Camp Fire  
5 Victim Clients”; listed fully in Appendix A), which include nearly 200 victims of the 2018 Camp Fire,  
6 hereby join in Motion of William B. Abrams Pursuant to Federal Rule of Bankruptcy Procedure 2004 for  
7 Entry of an Order Authorizing Discovery and Hearings Regarding the Acts and Conduct of JAMS Neutrals  
8 Given New Evidence.

9 **SCOPE OF JOINDER**

10 The Baum Hedlund Aristei Goldman Camp Fire Victim Clients join all relief sought in the Abrams’  
11 motion for entry of an order, pursuant to Bankruptcy Rule 2004:

12 1. Authorizing Abrams and other PG&E victims with claims to serve discovery in the form  
13 attached to the Motion as Exhibit B on JAMS Inc. neutrals associated with this case (the “Requests”) and  
14 ensure that responses are posted to the Fire Victim Trust portal for review by PG&E victims holding claims;

15 2. Authorizing JAMS neutrals or their designee(s) to respond to victim discovery requests  
16 within ten (10) days of receipt of the Requests and, the JAMS neutrals shall be directed to either (i) produce,  
17 on a rolling basis, all non-privileged documents and written responses to the Requests, or (ii) file all  
18 objections and/or responses to the Request with this Court;

19 3. Authorizing Abrams and other PG&E victims with claims to hold a hearing on Tuesday,  
20 September 27, 2022, via Zoom so that victims may ask questions and get answers from the Current Trustee,  
21 Former Trustee and other JAMS neutrals regarding their selection/hiring process, contractual terms, and  
22 associated financial incentives.

23 [Doc. No. 12766, pp. 16-17]

24 **APPLICABILITY OF MOTION TO JOINING PARTIES/CLAIMANTS**

25 The relief requested by the Abrams motion and the grounds supporting that relief apply to The Baum  
26 Hedlund Aristei Goldman Camp Fire Victim Clients as they have the same standing as Abrams, and the  
27 same factors affecting Abrams, affect their claims as well.

1 The Baum Hedlund Aristei Goldman Camp Fire Victim Clients join in the Abrams motion [Doc.  
2 No. 12766], rather than separately filing their own motion, to minimize the burden on this Court, which  
3 might be faced with separate motions from thousands of Claimants of the Fire Victim Trust.

4 **CONCLUSION**

5 For the foregoing reasons, the Baum Hedlund Aristei Goldman Camp Fire Victim Clients urge that  
6 the Court order the relief requested, pursuant to Bankruptcy Rule 2004, and for such other and further relief  
7 as may be just.

8  
9 Dated: August 26, 2022

Respectfully submitted,

10 BAUM HEDLUND ARISTEI GOLDMAN

11  
12 By: /s/ Matthew P. French

13 Ronald L.M. Goldman  
14 Matthew P. French,

15 *Attorneys for Creditors,*  
16 *Majesti Mai Bagorio, et al.*  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**EXHIBIT A**

- 1
- 2 Bainbridge , Robert (deceased)
- 3 Barker, Michelle
- 4 Barnard, Melissa; David Barnard, Tristan Barnard, Aiden Barnard, Hunter Barnard
- 5 Bates, Sarah
- 6 Bensel, Connie
- 7 Bird, Devon; A.E., a Minor
- 8 Bird, Douglas; Kathy Bird,
- 9 Boyd, Judith; Thomas & Judith Boyd Family Living Trust
- 10 Burton, Paul
- 11 Bustamante, Rudy; Diego Bustamante
- 12 Cameron, Denise
- 13 Chambers, Thomas
- 14 Christian, Kathy
- 15 Costa, Andrew; Shannon Costa, J.C., a Minor
- 16 Costa, Lynn
- 17 Culley, Denise; Emmett Culley
- 18 Darrin, Daniel
- 19 Dechter, Lorraine
- 20 Deen, Janet
- 21 Delaney, Colleen; John Struthers
- 22 Dobra, Susan; John Michael Sun
- 23 Ellis, David; Patricia Ellis
- 24 Ferreira Steve; Jill Ghirardelli
- 25 Flores, Lisa
- 26 Garcia, Jerry; Sharon Garcia
- 27 Gilbertson, Regan; Wayne Wise, C.W., a Minor
- 28 Gottowski, Gary; Rebecca Gottowski

1 Griffin, Suzanne  
2 Gunn, Linda  
3 Haber, Tom; Jeanne Haber  
4 Hill, Mark; Nancy Hill  
5 Ingoglia, Joseph; Arlene Ingoglia  
6 Jolley, Joan; Jane Ann Balsiger  
7 Jones, Norman  
8 Joseph, Daniel  
9 Kasza, Elizabeth  
10 Kearley, Justine  
11 Koenig, David  
12 Kunst, John; Vicki Kunst  
13 Lawhun, Jolene; Mateo Lawhun, A. L., a Minor  
14 Lawhun, Nicole; Steven Lawhun, Monica Mae Baggorio, Majesti Mai Bagorio, Yhana Mia Quinones-  
15 Gallegos, David Astrup, M.B, a Minor and M.B., a Minor  
16 Lawhun, Lucille  
17 Lazzarino, Mark; Stacy Lazzarino, T.L, I.L., J.L., Minors  
18 Lemos, Dhara; Rahaysa Poe  
19 Lewis Kelly; Michael Quigley  
20 Alexis Liles  
21 Luce, David  
22 Luce, Edward; Jeri Ann Luce  
23 Madruga, Maria; N.M. a Minor  
24 Magalia Community Church  
25 Matson, Kelly  
26 McKinnon, Mark; Wendy McKinnon  
27 Menezova, Maria; Elena Tonetti  
28 Miller-George, Sandra; John Miller-George

1 Morch, Andreas; Joanne Morch  
2 Moseley, Madison  
3 Myers, Jean; James Myers  
4 Paradise Community Guild  
5 Parker, Rosalie; Paul Switzer  
6 Petersen, Jennifer; David Pendergast, Michael Petersen, Logan Pendergast, Porter Petersen, Cheryl  
7 Pendergast, Wilbert Pendergast, Jr.  
8 Phelps-Zink, David; Lori-Phelps-Zink  
9 Poe, William; Maria Moraes  
10 Quattlander, Karen  
11 Renn, Carole Louise  
12 Rose, James  
13 Schuttenberg, Mark; Tanya Schuttenberg  
14 Sherman, Fay; Anne Sherman  
15 Smelser, Matthew; Brandy Alexander  
16 Sonntag, Walter; Diane Sonntag  
17 Sprague-Haber, LLC  
18 Sprague, Andy; Janelle Sprague, Serigne Saliou Birama Seyon Gueye  
19 Stewart, Donald; Jessie Stewart, G.S., a Minor  
20 Strange, Wendy  
21 Swiger, Jennifer  
22 Swiger, John  
23 Thorn, Steven  
24 Toci, William; Diana Toci  
25 Turner, Meghan; Charles Turner, W.T., H.T, Minors  
26 Varlinsky, Ray; Marianna Love  
27 Vigo, Phillip; Karissa Vigo, A.V., D.B. Minors  
28 Ward, Nicholas

1 Westrope, Anthony  
2 Williams, Robert  
3 Winterburn, Anthony; Alexandria Winterburn, A.W., a Minor  
4 Wonacott, Victoria  
5 Yang, Zongmei  
6 Zink, Don

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 **PROOF OF SERVICE**

2 I am over the age of 18 years and not a party to the within cause. My business address is Baum  
3 Hedlund Aristei Goldman, 10940 Wilshire Boulevard, Suite 1600, Los Angeles, California 90024. On this  
4 day, August 26, 2022, I served the following document(s) in the manner described below:

5 **JOINDER BY BAUM HEDLUND ARISTEI GOLDMAN CAMP FIRE VICTIM CLIENTS IN**  
6 **MOTION OF WILLIAM B. ABRAMS PURSUANT TO FEDERAL RULE OF BANKRUPTCY**  
7 **PROCEDURE 2004 FOR ENTRY OF AN ORDER AUTHORIZING DISCOVERY AND**  
8 **HEARINGS REGARDING THE ACTS AND CONDUCT OF JAMS NEUTRALS GIVEN NEW**  
9 **EVIDENCE [Doc. No. 12766]**

10  **VIA ECF:** I caused the aforementioned documents to be filed via the Electronic Case Filing (ECF)  
11 system in the United States Bankruptcy Court for the Northern District of California, on all parties  
12 registered for e-filing in Case Number Case No. 19-30088 (DM). Counsel of record are required by  
13 the Court to be registered e-filers, and as such are automatically e-served with a copy of the  
14 documents upon confirmation of e-filing.

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

17 Executed on August 26, 2022.

18 /s/ Matthew P. French  
19 MATTHEW P. FRENCH  
20  
21  
22  
23  
24  
25  
26  
27  
28