

1 BROWN RUDNICK LLP
David J. Molton (SBN 262075)
2 (DMolton@brownrudnick.com)
Seven Times Square
3 New York, New York 10036
Telephone: (212) 209-4800
4 Facsimile: (212) 209-4801

5 BROWN RUDNICK LLP
Joel S. Miliband (SBN 077438)
6 (JMiliband@brownrudnick.com)
2211 Michelson Drive, Seventh Floor
7 Irvine, California 92612
Telephone: (949) 752-7100
8 Facsimile: (949) 252-1514

9 *Attorneys for Fire Victim Trustee*

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

13 In re:

14 **PG&E CORPORATION,**

15 **- and -**

16 **PACIFIC GAS AND ELECTRIC COMPANY,**
17 **Debtors.**

- 18 Affects PG&E Corporation
19 Affects Pacific Gas and Electric Company
20 Affects both Debtors

21 ** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

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

**FIRE VICTIM TRUST'S
SUPPLEMENTAL NOTICE
REGARDING MCKINSEY
SETTLEMENT**

[Relates to Docket Number 12682]

1 TO FIRE VICTIMS AND ALL OTHER INTERESTED PARTIES:

2 PLEASE TAKE NOTICE that, as previously disclosed, the Fire Victim Trust (the “**Trust**”)
3 has settled potential claims (the “**Assigned Claims**”) against McKinsey & Company, Inc. United
4 States (“**McKinsey**”) that the Trust held as part of the Assigned Rights and Causes of Action
5 transferred to the Trust pursuant to the *Debtors’ and Shareholder Proponents’ Joint Chapter 11*
6 *Plan of Reorganization dated June 19, 2020* [Dkt. No. 8048]. The Trust previously filed an
7 unredacted copy of the settlement and release agreement by and among the Trustee and McKinsey
8 (the “**Settlement Agreement**”) [Dkt. No. 13502] and posted the Settlement Agreement on the Fire
9 Victim Trust Website at www.firevictimtrust.com. The Settlement Agreement provides, inter alia,
10 for McKinsey to remit to the Trust the total lump sum of twenty-five million dollars
11 (\$25,000,000.00) (the “**Settlement Amount**”) and for mutual releases between the parties to the
12 Settlement Agreement.

13 PLEASE TAKE FURTHER NOTICE that the Trust previously filed an unredacted copy of
14 the engagement letter (the “**McKinsey Claims Engagement Letter**”) [Dkt. No. 13502] effective
15 January 1, 2022, between the Trust and Andrews & Thornton, Attorneys at Law, A Law
16 Corporation and Greenberg Gross LLP (together, “**Litigation Counsel**”) in connection with the
17 Assigned Claims and posted the McKinsey Claims Engagement Letter on the Fire Victim Trust
18 Website at www.firevictimtrust.com. Pursuant to the McKinsey Claims Engagement Letter,
19 Litigation Counsel shall be entitled to attorneys’ fees in the form of a contingency fee equal to 20%
20 of the Net Proceeds (as defined in the McKinsey Claims Engagement Letter).

21 PLEASE TAKE FURTHER NOTICE that, having performed an accounting to determine
22 its costs, expenses, and attorneys’ fees incurred in connection with the Assigned Claims, the Trust
23 files this supplemental notice to provide the following further disclosures: the gross amount
24 realized was \$25,000,000.00; costs and expenses totaled \$983,953.59; attorneys’ fees totaled
25 \$4,803,209.28; and the net benefit to the Trust was \$19,212,837.13, as detailed in the following
26 table:

27 ///

28

McKinsey Settlement Distribution		
Gross Settlement Recovery		\$25,000,000.00
Minus Expenses		\$983,953.59
Consultant for Electronic Database / Discovery Platform	\$10,175	
Electronic Database / Discovery Platform	\$726,106.42	
Financial Analyst	\$163,728.00	
Mediator	\$33,618.50	
Insurance Counsel	\$50,325.67	
TOTAL	\$983,953.59	
Net Proceeds		\$24,016,046.41
Minus Attorneys' Fees (20% of Net Proceeds)		\$4,803,209.28
Distribution to Trust		\$19,212,837.13

DATED: April 27, 2023

BROWN RUDNICK LLP

By: /s/David J. Molton

David J. Molton (SBN 262075)
(DMolton@brownrudnick.com)
Seven Times Square
New York, New York 10036
Telephone: (212) 209-4800
Facsimile: (212) 209-4801

and

Joel S. Miliband (SBN 077438)
(JMiliband@brownrudnick.com)
2211 Michelson Drive
Seventh Floor
Irvine, California 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514

Attorneys for Fire Victim Trustee