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*Counsel for Official Committee of Tort Claimants*

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

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

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

*\*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)

**DECLARATION OF CATHY YANNI IN  
SUPPORT OF THE APPLICATION OF  
THE OFFICIAL COMMITTEE OF  
TORT CLAIMANTS PURSUANT TO 11  
U.S.C. § 1103 AND FED. R. BANKR. P.  
2014 AND 5002 TO RETAIN AND  
EMPLOY CATHY YANNI AS CLAIMS  
ADMINISTRATOR *NUNC PRO TUNC*  
TO JANUARY 13, 2020 THROUGH THE  
EFFECTIVE DATE OF THE  
RESOLUTION TRUST AGREEMENT**

Date: March 10, 2020  
Time: 10:00 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102  
Objection Deadline: March 3, 2020

1 Pursuant to section 1746 of title 28 of the United States Code, I, Cathy Yanni, hereby  
2 declare under penalty of perjury that the following is true to the best of my knowledge,  
3 information, and belief:

4 1. I am an attorney at law licensed to practice law in the state of California. I am in  
5 good standing. I am duly authorized to make this Declaration (the “**Declaration**”). Unless  
6 otherwise stated in this Declaration, I have knowledge of the facts set forth herein and, if called as  
7 a witness, I would testify thereto.

8 2. I submit this Declaration in support of the Application (the “**Application**”) of the  
9 Official Committee of Tort Claimants (the “**TCC**”) of PG&E Corporation and Pacific Gas and  
10 Electric Company (collectively the “**Debtors**”) for the entry of an order authorizing my  
11 employment as the proposed claims administrator for the period beginning on January 13, 2020  
12 and terminating on the effective date of the claims resolution trust agreement (the “**Trust**”),  
13 pursuant to section 1103 of title 11 of the United States Code (the “**Bankruptcy Code**”), and Rules  
14 2014 and 5002 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”). I am  
15 being retained to independently evaluate issues of concern to the establishment of a claims  
16 resolution process and receive input from the TCC and consenting fire claimant professionals for  
17 this purpose. Presently, I am serving as the court-appointed Administrator of the Wildfire  
18 Assistance Program (the “**Wildfire Assistance Program**”).

19 3. I am a specialist in claims resolution and administration as well as alternative  
20 dispute resolution. As the Administrator of the Wildfire Assistance Program, I developed the  
21 specific eligibility requirements and applications for the Wildfire Assistance Program. I am  
22 responsible for ensuring that the funds in the Wildfire Assistance Program as distributed in a fair  
23 and equitable manner to claimants with urgent and unmet needs. Currently, there are more than  
24 20,000 claimants, and approximately \$70 million has been distributed. As a result of my work as  
25 Administrator, I have significant experience in addressing the types of challenges presented in the  
26 cases (the “**Cases**”).

27 4. I worked with Justice Trotter to formulate a resolution program for the 2007 San  
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1 Diego fire cases, ultimately acting as mediator and arbitrator for the program.

2 5. In addition to my work as the Administrator of the Wildfire Assistance Program, I  
3 have settled tens of thousands of cases and facilitated distribution of billions of dollars in  
4 settlement funds to claimants. I have overseen claims reconciliation processes and worked with  
5 multiple claims management firms, including BrownGreer PLC, one of the professionals in the  
6 Cases. I have been a Court Appointed Special Master and/or Mediator in numerous cases  
7 involving wildfires, mass torts, and class actions. In addition to being appointed as an appeal  
8 panelist in the Takata Airbag Tort Compensation Trust Fund established in the *TK Holdings Inc.*  
9 bankruptcy case, I have been appointed as an Administrator, Special Master, or Mediator in  
10 thousands of other cases, including:

- 11 ■ Settlement Special Master for the *In Re: National Prescription Opiate Litigation*  
12 by The Hon. Dan Polster, US District Court for the Northern District of Ohio
- 13 ■ Special Master for the *Abilify MDL* by The Hon. M. Casey Rodgers, US District  
14 Court for the Northern District of Florida, following the joint recommendation of  
15 the plaintiffs and defendants settlement committee
- 16 ■ Settlement Special Master for *Medtronic Infuse* by The Hon. John D. Minton,  
17 Kentucky Supreme Court (2016)
- 18 ■ Special Master by The Hon. David A. Katz, US District Court for the Northern  
19 District of Ohio, for *In re: DePuy Orthopaedics, Inc. ASR Hip Implant Products*  
20 *Liability Litigation*
- 21 ■ Settlement and Discovery Special Master by The Hon. Dan Polster, US District  
22 Court for the Northern District of Ohio, in *Gadolinium Contrast Dyes Product*  
23 *Liability Litigation*
- 24 ■ Special Master by The Hon. Richard Kramer, Superior Court of California, San  
25 Francisco County by agreement of the parties for the JCCP, *Gadolinium Contrast*  
26 *Dyes Product Liability Litigation*
- 27 ■ Special Master by agreement of the parties for the *St. Jude Riata Lead Wire Medical*  
28 *Device Litigation*
- Special Master by agreement of the parties for *Kelly v. Xoft*, for claims arising out  
of alleged tungsten migration used in breast cancer treatment
- Special Master by The Hon. Wynne Carvill, Superior Court of California, Alameda  
County for the *Medtronic Infuse Litigation*

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- Special Master in the JCCP, *PPA* Consolidated Cases by The Hon. Anthony Mohr, Superior Court of California, Los Angeles County
- Federal Mediator in the *Baycol MDL* by The Hon. Michael J. Davis, US District Court for the District of Minnesota
- Settlement Special Master by agreement of the parties in the *Bextra MDL* and the *Ortho Evra MDL*
- Settlement Special Master by agreement of the parties in the *Zicam I and II MDL*
- Settlement Special Master in the *Zyprexa I and II MDL* by The Hon. Jack Weinstein, US District Court for the Eastern District of New York
- Federal Mediator in *Silicon Gel Breast Implant Litigation* by The Hon. Denise Hood, US District Court for the Eastern District Michigan

6. I have received multiple honors my work. In 2019, I was included in the “National Mediators” List, *Chambers USA*. In 2016, I was recognized as an “ADR Champion” by the National Law Journal. In 2014 and 2015, I was honored for being a Woman Leader in the Law, *ALM Publications*. In 2013, I was named a *Daily Journal* Top Master. I was recognized by the *Daily Journal* as a Top 50 California Neutral in 2003 to 2005 and 2010 to 2012, a Top 40 California Neutral in 2007 and 2008, and a Top 30 California Neutral in 2006. I have an “AV Preeminent” rating with Martindale-Hubble.

7. I obtained from the TCC and/or its representatives the names of individuals and entities that may be parties in interest (individually a “**Potential Party in Interest**” and collectively the “**Potential Parties in Interest**”) in the Cases. I reviewed the name of each Potential Party in Interest to determine the names of each Potential Party in Interest that has entered into engagement agreements with me in the last two years. Additionally, where the review *did not* produce a name identical to the name of Potential Party In Interest but *did* produce a name that could potentially be an affiliate of a Potential Party in Interest or associated with a Potential Party in Interest by virtue of name similarity, I also identified and disclosed relationships with any such Potential Party in Interest.

8. In several instances, the names on the list of Potential Parties in Interest were very

1 common and/or generic. As such, it was not possible to identify with certainty whether I have any  
2 client relationship to disclose for those specific names.

3 9. My search revealed that I previously served as a neutral in cases involving parties  
4 who were represented by attorneys who are representing certain fire victims and committee  
5 members. The attorneys are Steven Skikos, Gregory Skikos and Matthew Skikos from the firm  
6 Skikos Crawford Skikos & Joseph, LLP, Anne Andrews from the firm Andrews & Thornton,  
7 Khaldoun Baghdadi and Michael Kelly from the firm of Walkup, Melodia, Kelly & Schoenberger,  
8 Mary Alexander from the firm Mary Alexander & Associates, P.C., Frank Pitre from the firm  
9 Cotchett, Pitre & McCarthy, Elizabeth Cabraser from the firm Lieff, Cabraser, Heimann &  
10 Bernstein LLP, and Thomas Brandi from the Brandi Law Firm. I also served as a neutral in a  
11 matter involving AIG Europe Limited. The mediations are closed and did not involve the Debtors.

12 10. In addition to the above disclosures, in my role as Administrator of the Wildfire  
13 Assistance Program, I have interacted with multiple claimants directly or through their attorneys.  
14 I also work with BrownGreer PLC on the Wildfire Assistance Program.

15 11. It is possible that I may now or in the future be retained by one or more of the  
16 Potential Parties in Interest in unrelated matters. To the extent the Debtors discover and disclose  
17 additional Potential Parties in Interest during the course of these Cases, I will use reasonable efforts  
18 to identify whether a material relationship exists with any such parties. To the extent that I discover  
19 or enter into any new, material relationship with Potential Parties in Interest, I will supplement this  
20 Declaration.

21 12. Although unlikely, in addition to the above disclosures, I may also represent, or may  
22 have represented, affiliates, equity holders or sponsors of Potential Parties in Interest and I may  
23 have worked with, continue to work with, have or had mutual clients with, been represented by  
24 and/or advised certain accounting and law firms that are Potential Parties in Interest (and, in the  
25 case of law firms, may have entered into engagement agreements in which the law firm was named  
26 as client although the work was performed for a mutual client of mine and the applicable law firm).  
27 I may also represent, or may have represented in the past, committees or groups of lenders or  
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1 creditors, which committees or groups include, or included, entities that are Potential Parties in  
2 Interest.

3 13. Although I have researched the Potential Parties in Interest list, the Debtors may  
4 have customers, creditors, competitors, and other parties with whom they maintain business  
5 relationships that are not included as Potential Parties in Interest and with whom I may maintain  
6 business relationships.

7 14. Other than as disclosed herein, I have no relationship with the Debtors, the United  
8 States Trustee for Region 17 or any person employed in the San Francisco office of the United  
9 States Trustee or any United States Bankruptcy Judge for the Northern District of California of  
10 which I am aware after due inquiry. Based on the foregoing, I believe that I am disinterested as  
11 defined in section 101(14) of the Bankruptcy Code and do not hold or represent an interest  
12 materially adverse to the Debtors or their estates.

13 15. As of the date of this Declaration, I have not received any compensation for my  
14 work on behalf of the TCC. I receive compensation for my work as Administrator of the Wildfire  
15 Assistance Program from funds in the program.

16 16. I intend to apply to the Court for payment of compensation and reimbursement of  
17 expenses in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules,  
18 the Guidelines promulgated by the Office of the United States Trustee, pursuant to the order  
19 entered by this Court on February 28, 2019, establishing the procedures for interim compensation  
20 and reimbursement of expenses of professionals (Dkt. No. 701), the Notice of Filing of Parties'  
21 Revised Fee Examiner Protocol (Dkt. No. 4473), and any additional procedures that may be  
22 established by the Court in these Cases.

23 17. Subject to the Court's approval, I will be compensated at my standard hourly rates,  
24 which are based on my level of experience, plus reimbursement of the actual and necessary  
25 expenses that I incur in accordance with the ordinary and customary rates which are in effect on  
26 the date the services are rendered. At present, my standard hourly rate for a matter such as this is  
27 \$1,250.

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difference.

Response: I did not represent the TCC prior to the commencement of the Debtors' Cases.

Question: Has your client approved your prospective budget and staffing plan, and, if so, for what budget period?

Response: I will be working in this matter as a sole practitioner. I understand that the TCC, along with the Debtors, United States Trustee and Fee Examiner, will maintain active oversight of my billing practices.

21. I will use reasonable efforts to comply with the above Guidelines.

Dated: February 11, 2020

By:  \_\_\_\_\_  
Cathy Yanhi



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*Counsel for Official Committee of Tort Claimants*

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

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

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

*\*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)

**SUPPLEMENTAL DECLARATION OF  
CATHY YANNI IN SUPPORT OF THE  
APPLICATION OF THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
PURSUANT TO 11 U.S.C. § 1103 AND  
FED. R. BANKR. P. 2014 AND 5002 TO  
RETAIN AND EMPLOY CATHY  
YANNI AS CLAIMS ADMINISTRATOR  
NUNC PRO TUNC TO JANUARY 13,  
2020 THROUGH THE EFFECTIVE  
DATE OF THE RESOLUTION TRUST  
AGREEMENT (Relates to Dkt. Nos. 5723  
and 5724)**

Date: March 10, 2020  
Time: 10:00 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102  
Objection Deadline: March 3, 2020

1 Pursuant to section 1746 of title 28 of the United States Code, I, Cathy Yanni, hereby  
2 declare under penalty of perjury that the following is true to the best of my knowledge, information,  
3 and belief:

4 1. I am an attorney at law licensed to practice law in the state of California. Since  
5 1998 I have been a neutral with JAMS, which specializes in the resolution of claims and legal  
6 disputes by providing efficient, cost-effective and impartial ways of overcoming barriers at any  
7 stage of conflict. I have extensive experience resolving mass tort claims, and have acted as a  
8 special master, mediator and administrator in multiple cases involving tens of thousands of claims,  
9 including claims for personal injury, property damage and business loss.

10 2. I am presently serving as the court appointed Administrator of the Wildfire  
11 Assistance Program (the “**Administrator**”) established in the bankruptcy cases (the “**Cases**”) of  
12 PG&E Corporation and Pacific Gas and Electric Company (collectively the “**Debtors**”). I am duly  
13 authorized to make this supplemental declaration (the “**Declaration**”). Unless otherwise stated in  
14 this Declaration, I have knowledge of the facts set forth herein and, if called as a witness, I would  
15 testify thereto.

16 3. I submit this Declaration as a supplement to my declaration (the “**Original**  
17 **Declaration**”) dated February 11, 2020 (Dkt. No. 5724), and in further support of the *Application*  
18 *of the Official Committee of Tort Claimants (the “TCC”) Pursuant to 11 U.S.C. § 1103 and Fed.*  
19 *R. Bankr. P. 2014 and 5002 to Retain and Employ Cathy Yanni as Claims Administrator Nunc Pro*  
20 *Tunc to January 13, 2020 Through the Effective Date of the Resolution Trust Agreement* (the  
21 “**Application**”) (Dkt. No. 5723).

22 4. I was appointed Administrator on June 5, 2019. Since my appointment, I have taken  
23 several steps to ensure that the funds set aside for the Wildfire Assistance Program have been and  
24 continue to be distributed in a fair and equitable manner.

25 5. As a result of my work as Administrator, I have gained significant knowledge  
26 regarding the claims of a large portion of the tort claimants. Thousands of the claimants whose  
27 claims I administered and continue to administer under the Wildfire Assistance Program will also  
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1 be beneficiaries of the Fire Victim Trust (the “Trust”). As a result, I will be able to administer  
2 the claims filed against the Trust quickly and effectively.

3 6. I anticipate being able to complete the administration of the Wildfire Assistance  
4 Program by April 15, 2020.

5 7. I have been retained by the TCC to act as the proposed independent claims  
6 administrator for the Trust. To date, my services as proposed claims administrator have been  
7 limited to facilitating the development of a claims resolution process. I have spent approximately  
8 180 hours and incurred approximately \$225,000 in fees developing these procedures. My work  
9 has been separate and distinct from the services provided by the proposed trustee, the Honorable  
10 John K. Trotter (Ret.), with whom I have worked in the past, and Baker & Hostetler LLP, counsel  
11 to the TCC. Brown Rudnick LLP has been assisting me in my capacity of proposed independent  
12 claims administrator and has provided advice related to the Trust and the claims resolution  
13 procedures (“CRP”). Additionally, the proposed Trust and proposed CRP expressly set forth the  
14 scope of the duties of the claims administrator and trustee, and provide limitations on the role of  
15 the claims administrator. As a result, my services have not, and will not, overlap with those of the  
16 trustee or Baker & Hostetler LLP. Moreover, it is anticipated that many of the tasks assigned to  
17 the claims administrator will mirror those I perform as Administrator.

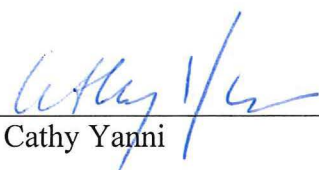
18 8. While I have conferred with the TCC, Debtors, and counsel for individual fire  
19 claimants in connection with the establishment of the Wildfire Assistance Program, I have always  
20 exercised my independent judgment as Administrator. If I am retained as claims administrator for  
21 the Trust, I will continue to exercise my independent judgment and independently evaluate issues  
22 of concern regarding the Trust’s claims resolution process.

23 9. Based on the foregoing and upon my statements in the Original Declaration, I  
24 believe that I am disinterested as defined in section 101(14) of the Bankruptcy Code, do not hold  
25 or represent an interest materially adverse to the Debtors or their estates, and do not have any  
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conflicts which would prevent me from serving as proposed claims administrator for the Trust pre-confirmation, or as claims administrator post-confirmation.

Dated: February 28, 2020

By:   
Cathy Yanni