

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:) Bankruptcy Case
) No. 19-30088-DM
PG&E CORPORATION,)
) Chapter 11
and)
) Jointly Administered
PACIFIC GAS AND ELECTRIC)
COMPANY,)
)
Debtors.)

TELEPHONIC TOWN HALL
MAY 15, 2020

1 think you estimated about 30 percent of the fire
2 claimants, that's a very good indication of full
3 understanding of the plan and recognizing that this is a
4 good deal, the best deal that we could get, and that
02:03 5 there is no alternative plan.
6 So to all the Robins Cloud clients that
7 have not yet voted and maybe are on the line, I want to
8 echo Mikal's sentiment, which is now is the time to
9 vote, because you've got a few short hours to do so. So
02:03 10 you want to move on that. If you need our help, we can
11 help; but at this point, we're -- we're -- we're at the
12 point where we need our clients to log onto the website,
13 if you have that capability, and to vote, so they don't
14 miss that opportunity.
02:03 15 And thanks for having me again.
16 MR. WATTS: Great. Thanks, Robert.
17 Roy Miller, would you give your thoughts
18 about where we are in this 11th hour of the voting
19 period that ends in less than four hours now. So if
02:03 20 anybody hadn't voted, give them your thoughts. Roy, as
21 you know, is my colleague, working together with me in
22 all the Tubbs Fire and the Atlas and several of the
23 North Bay Fires. His house burned down on the night of
24 the Tubbs Fire. He's been invaluable as a colleague.
02:03 25 And I apologize for the background noise where I'm at.

1 MR. WATTS: Good afternoon. It's Mikal
2 Watts. Thank you for joining our tenth telephonic town
3 hall meeting. We've got with me Robert Bryson from the
4 Robins Cloud law firm and Roy Miller, who is working
02:01 5 together with us. This is Mikal Watts. We'll have
6 Jerry Singleton, adding. Judge Montali is having a
7 hearing as we speak.
8 As you may have heard from our texts and
9 our e-mails, today is the deadline for the vote. So if
02:01 10 you received a ballot and have not cast that ballot,
11 with all due respect to people saying don't vote too
12 early, don't vote too late. You've got a couple of
13 hours, so it's time to move now.
14 So what I'd like to do is pass the baton
02:02 15 to Robert Bryson. Robert, will you kind of give us the
16 update about what the Robins Cloud firm is seeing, what
17 you know, what's new from last week.
18 MR. BRYSON: Well, it's similar to what we
19 experienced in the past weeks, which is now we're up to
02:02 20 65 percent of our clients that have voted, and of those
21 65 percent, we're just under 98 percent have voted to
22 accept the plan. So, as I indicated, we're seeing a
23 trend, I think, between all the firms that have been
24 participating in these calls, that we're running at or
02:02 25 around 98 percent accept. And since we represent, I

1 So I'm going to mute myself so that Roy can talk to you.
2 Go ahead.
3 MR. MILLER: Thank you, Mikal. We've
4 answered quite a few questions that people had. One of
02:04 5 the mixed blessings with technology these days is that
6 social media has a way of whipping people into a frenzy
7 about a lot of things, and sometimes the facts that they
8 are given are not accurate. So we've been giving them
9 information, answering any questions that they've had.
02:04 10 I believe that around three quarters of
11 our clients have already voted, and the trend lines on
12 voting are similar. Any lawyer that you employ is
13 required to give you a recommendation, no matter what
14 kind of case it is. But, at the same time, you as the
02:04 15 client have the right to make a decision that you feel
16 is best for you and your family, and we respect that.
17 So we want you to have your voices heard, as we've had
18 from the beginning, which is one big reason why we've
19 had these ten town halls. You do still have a few hours
02:05 20 left to vote, but you need to act now.
21 All of you from our group who have not yet
22 voted should have received a final text or e-mail from
23 our group to vote, and we would ask that you exercise
24 your right to vote. And then the vote tally, I believe,
02:05 25 is going to be announced by the Court right before the

1 plan confirmation hearings, which start on the 27th.
 2 And I know it's been a long process and I
 3 thank you guys for your patience and we look forward to,
 4 hopefully, going over with you what the claims process
 02:05 5 will look like and how we're going to get the claims on
 6 file.
 7 Thank you, Mikal.
 8 MR. WATTS: Great, Roy.
 9 So the next topic that I wanted to address
 02:05 10 is what happened in court this week, lots of filings.
 11 Today is the deadline for objections to the plan. So
 12 there is literally tens and tens and tens of filings
 13 today. Those objections will be briefed and litigated
 14 in front of the Court, and the Court will hold that
 02:06 15 hearing on May the 27th. So what you can plan on is is
 16 there's an estimation hearing in front of Judge Donato
 17 on May 21. There is a confirmation hearing in front of
 18 Judge Montali on May 27th.
 19 Just not -- I don't have a crystal ball,
 02:06 20 but I predict that well more than two-thirds of the
 21 required votes will vote to accept the \$13 and a half
 22 billion. We literally -- I mean, by telling you that, I
 23 don't mean to suggest that I don't want everybody to
 24 vote. I do. I want every one of my clients to vote.
 02:06 25 You got to do it. You got less than four hours to get

1 it to us quickly. But, at the same time, we want
 2 everybody's voice to be heard.
 3 So if the vote goes the way we think it
 4 will and there is a success in the vote, here's what is
 02:06 5 next: As I said, there will be a hearing in front of
 6 Judge Donato on May 21. There will be a confirmation
 7 hearing on May 27th. There was a motion filed by Will
 8 Abrams, I think it was on February 20th to disallow the
 9 Watts Guerra votes because there was some alleged
 02:07 10 conflict that I had. That was overruled by the Court
 11 today. So everybody that's a Watts Guerra client will
 12 have their votes counted, if you vote. And if you
 13 haven't voted yet, again, again, we encourage you to do
 14 so.
 02:07 15 So what we are going to do now is normally
 16 we answer a ton of preprinted questions. And we have
 17 gotten some. I don't want to say we haven't gotten any,
 18 but here's the bottom line: The vote's going to end in
 19 four hours. They're going to be sent to Prime Clerk.
 02:07 20 The votes will be counted in three or four days. We'll
 21 have a pretty good idea of where we are in advance of
 22 the estimation hearings. And we'll have a confirmation
 23 hearing. And at that point, when the plan is confirmed,
 24 then we will be working with PG&E to execute the terms
 02:07 25 of the settlement agreement.

1 I can tell you that I've got a schedule
 2 already for Monday and Tuesday to work on some last
 3 execution deals with the folks at the equity that are
 4 putting the money in to get PG&E out. I think their
 02:08 5 sense is is that the plan is going to succeed, and they
 6 don't want any difficulties. They want us to be moving
 7 together in a way that moves the stock up and gets the
 8 victims paid as quickly as we can. So we'll be doing
 9 that Monday and Tuesday of next week, and we'll have an
 02:08 10 update for you.
 11 But what you can expect from my law firm
 12 and I think from the other law firms is we're going to
 13 move from the voting phase into the claims process. So
 14 you're going to start getting a lot of texts and e-mails
 02:08 15 and letters and updates about information that we need
 16 to collect from you to fully optimize your claim. So
 17 there is several stages of this, okay.
 18 No. 1, the subrogation carriers have about
 19 \$3 and a half billion set aside that they have not yet
 02:09 20 paid some of the claims on. So we want to make sure the
 21 insurance carriers are actually paying those claims as
 22 opposed to pushing that \$3 and a half billion in
 23 liability into the trust. So we'll send you in short
 24 order a proposed letter that you should send to every
 02:09 25 one of your insurers. We want to make sure you've

1 executed your insurance claim, if you have an insurance
 2 claim. If you don't, it's no big deal. That's Step 1.
 3 Step 2, we're starting to get indication
 4 from the trustee as to what the claims rules are going
 02:09 5 to be. Those are not going to be finalized until
 6 probably July 1, but they're giving us enough hints that
 7 we're in pretty good shape to start working on it,
 8 collecting the information. As you know, Watts Guerra
 9 has had contents college with thousands of its clients,
 02:09 10 collected the information and plugging it in for over
 11 two years to get that information. I'm sure that Robert
 12 Bryson's firm has been doing the same and all the other
 13 firms as well. So what you're going to see is a
 14 transition away from the vote begins today into
 02:10 15 collecting information that we need to prepare your
 16 claim to the 13-and-a-half-billion-dollar trust fund so
 17 that we can get you paid sooner rather than later.
 18 So what are we doing right now. No. 1,
 19 I've got about ten people who are employed in our Chico
 02:10 20 and Santa Rosa offices that are working specifically on
 21 our business loss claims.
 22 No. 2, because of the coronavirus
 23 sheltering-in-place situation, there are tons of very
 24 skilled law students who don't have jobs this summer.
 02:10 25 I've instructed my brother Guy Watts to hire about 50 of

1 them. And what we're going to do is beginning next
 2 week, we're going to train those 50 people to be in
 3 touch with our clients and start, you know, looking at
 4 the database that we already have, that has a lot of
 02:10 5 information about your claim, and where are the holes.
 6 And with your permission, we're going to try to fill
 7 those holes over the next 30, 35 days before we get the
 8 formal claims rules.
 9 Why are we doing that? While we don't
 02:11 10 know what the claims rules are, we've been in the
 11 meetings where they've been discussed and we have a good
 12 idea of what they're going to be. And there is just no
 13 sense in wasting 45 days in the final claims period
 14 while we're not collecting information. So Watts Guerra
 02:11 15 will have 50 employees calling its 16,000 clients. And
 16 the other law firms are doing the same. But we're
 17 trying to, in effect, get information about your claims
 18 into the database so that when the claims form formally
 19 comes out, we can put your claim at the front of the
 02:11 20 line, and that's our goal. We don't know how long the
 21 claims period will be, but we don't care. We want our
 22 clients to get at the front of the line with the
 23 optimized data.
 24 So if you haven't sent us your insurance
 02:11 25 information, we want it. If you haven't sent us your

1 personal property list, we want it. If you haven't sent
 2 us ownership documents with respect to the structure, we
 3 want it. If you sustained mental anguish and seen
 4 counselors or gotten a diagnosis of PTSD, we want that,
 02:12 5 we need it. We need that in our file. If you lost
 6 trees or outdoor ^ In clip mill or forestry, I've got an
 7 arborist working around the clock, Mr. John Brown.
 8 We'll have some others as well. So we're collecting as
 9 much information as we can. This is why we've been
 02:12 10 asking you for this for two years.
 11 So we're going to throttle down and be
 12 bothering you, for lack of a better word, to collect the
 13 information, because my job is to optimize the amount of
 14 your claim. And if you'll give us that information,
 02:12 15 that data, that information about your lawsuits, you're
 16 going to get more than if you don't.
 17 So that'll be our plan over the next 30,
 18 45 days. We'll send you an update once the plan is
 19 confirmed, letting you know what the specifics are. But
 02:12 20 just know, think in terms of 50,000-foot view. I know
 21 we've pushed you hard to vote. We wanted everybody to
 22 vote. The voting period ends today. Now, we're in the
 23 claims period. So we're collecting information. And we
 24 don't want to bother you, but, at the same time, we must
 02:13 25 collect that information. The trust will not pay claims

1 that are not documented.
 2 So we got the processes in place. We've
 3 spent millions of dollars on this database, on employees
 4 to collect information from you. We want to get that
 02:13 5 information from you and make sure that your particular
 6 claim is maximized so we can get every dollar that you
 7 lost.
 8 So if you have a question, and I know you
 9 do, we'd like you to press star 3. And Sam Roecker is
 02:13 10 our administrator on this call. We're going to try to
 11 answer as many questions as we can. We've been going
 12 about 13 minutes. So this call is only one hour long,
 13 just because the vote's over so we don't need to sit
 14 here and tell you why to vote. But if you haven't
 02:13 15 voted -- whether your vote is to accept or reject, I want
 16 recommend that you accept, but, at the same time, I want
 17 you and your voice to be heard. So if you choose
 18 to reject this plan, vote to reject it. If you choose
 19 to accept this plan, vote to accept it. But do so in
 02:14 20 the next 90 minutes. But, in the meantime, I think the
 21 focus of our questions for the rest of this call is
 22 going to be how can we help you get your claim ready.
 23 So press star 3 with any questions you
 24 have. Sam, do we have questions that we can start
 02:14 25 answering?

1 MR. ROECKER: Yeah, we got a couple that
 2 are coming in. Again, star 3. If you're listening
 3 on-line, you can just type it in and we'll see that on
 4 our screen.
 02:14 5 David wants to know about the inventory
 6 list. Is there a deadline when the inventory list needs
 7 to be turned in? If so, what is that deadline?
 8 MR. WATTS: Yeah, so we don't have a
 9 deadline yet because it hasn't been set. But I'm going
 02:14 10 to give this to Roy Miller because he's done a lot of
 11 this content stuff. Our internal deadline is to get to
 12 us yesterday. Don't wait.
 13 Roy, take them through what the process
 14 has been to try to collect this information and how
 02:14 15 we're putting it into the database to get this claims
 16 process ready.
 17 MR. MILLER: Sure, thanks, Mikal.
 18 The way that we have handled it within our
 19 group is that those of you that went through the
 02:15 20 contents process through your insurance company, you
 21 submitted a list to them. They then compiled the list
 22 and spit it back to you-all along with payments and
 23 maybe you went back and forth about valuation. Whatever
 24 list that you already made that you shared with your
 02:15 25 insurance companies, we want that.

1 If there are additional items that you
 2 have recollected that you had, you can add to the list,
 3 of course. And then you get that list to us. We put it
 4 into a database we built from the ground up, and that'll
 02:15 5 be one section of your claim. The other firms, I'm
 6 sure, have similar processes. And, yes, we do want to
 7 get it sooner rather than later, because we will go
 8 through a process where we talk to you about the claims
 9 documents we have, the various parts of the claims
 02:15 10 process, and how that factors into the ultimate number
 11 we'll be asking for. So the sooner you get it to us,
 12 the better.

13 There are some people that had a lot of
 14 difficulty, including my family, in putting together the
 02:16 15 list. I certainly understand that. And we're not
 16 intending to cause trauma, but I -- we also want you to
 17 get repaid for that which you lost. So whenever you can
 18 get it to us, we would certainly appreciate it.

19 Thank you, Mikal.

02:16 20 MR. WATTS: Great.

21 What's the next question, Sam?

22 MR. ROECKER: The next question is from
 23 Dwight. Dwight wants to know, realistically, if the
 24 plan is confirmed, when can they expect to start
 02:16 25 receiving payment.

1 Mikal, I think you're muted. The question
 2 was if the plan is confirmed, when will they begin to
 3 receive payments.

02:16 4 MR. WATTS: Right. And I was going to
 5 invite Robert Bryson to try to answer it. Robert, are
 6 you hearing me?

7 MR. BRYSON: Yes. So that -- it's a
 8 famous lawyer phrase. It depends. So if I dovetail
 9 onto what Mikal and Roy said, the sooner you provide us
 02:17 10 with your information. And this obviously applies to
 11 Robins Cloud clients, but also Watts Guerra clients,
 12 et cetera, everyone. The sooner you get us the
 13 information, the sooner we'll be able to submit your, I
 14 call it a prove-up, your prove-up claim to the trust
 02:17 15 administrators. And then they'll have an opportunity
 16 then to review it. Hopefully, it's an early bird gets
 17 the worm type situation.

18 So if they've got their ducks lined up, I
 19 think there has been an estimate of by fourth quarter,
 02:17 20 sometime in the fourth quarter of 2020 we would hope
 21 that we would start seeing settlement decisions. And,
 22 but for folks that need more time because they don't
 23 have the information, for example, many Camp folks are
 24 still in the process of trying to get contractors,
 02:17 25 et cetera, to get bids for rebuilding and working with

1 their insurance company, they may take a little longer.

2 Plus, it also depends upon whether or
 3 not -- let's say hypothetically you were to get your
 4 award and then you decide, in consultation with your
 02:18 5 attorney, that you think that some dollars, important
 6 dollars were left on the table, so you decide to take
 7 advantage of the appeals process. And there is a -- I'm
 8 not going to go into a -- link into the steps of that
 9 appeals process, but that, obviously, can build in some
 02:18 10 delays.

11 What we're telling Robins Cloud clients
 12 are that we are hopeful that by second quarter 2021,
 13 we'll have our clients well represented in terms of
 14 receiving their long overdue settlement, and that's an
 02:18 15 outside number rather than an early number.

16 MR. WATTS: Yeah, I agree with that time
 17 frame.

18 So, Sam, what is the next question?

19 MR. ROECKER: Yeah, a similar question.
 02:18 20 Barbara wants to know how she should get that
 21 information to her attorneys. I think in this case
 22 she's one of your clients, Mikal. But, overall, how
 23 should they go about getting information to their
 24 attorneys to complete their claims?

02:18 25 MR. WATTS: If you're a Watts Guerra

1 client and you're in the Camp area, we want you to
 2 e-mail us at chico@wattsguerra.com,
 3 c-h-i-c-o-@-w-a-t-t-s-g-u-e-r-r-a.com. If you're a
 4 North Bay client, e-mail us at santarosa@wattsguerra.com
 02:19 5 and you can get us that information. The sooner you can
 6 get it, the better off you are. We're going to continue
 7 to press you until we feel like we've gotten all the
 8 information that we can. But you would literally save
 9 us a lot of time and money if you get it to us quickly
 02:19 10 as opposed to us having to dig it out of you. We will
 11 try -- our job is to get you paid every last dime that
 12 we can get you paid. And it's literally a function of
 13 dollars and cents. If you get us more information, you
 14 get more dollars. If you get us less information, you
 02:19 15 get less cents.

16 Go ahead, Sam.

17 MR. ROECKER: Yeah, the next one, it looks
 18 like Pat is looking at his proof of claim form on-line
 19 and sees the claim amount to be valued at \$1 on the
 02:19 20 ballot. Will that change the actual claim amount?

21 MR. WATTS: Yes. I mean, Judge Montali
 22 made it clear to us that, in effect, for the vote,
 23 everybody was going to have a 1 -dollar valuation. It
 24 was kind of a majority vote, two-thirds of the vote.
 02:20 25 Yes, we did not fill that out because we didn't want to

1 put the value without knowing what your value was. So
2 now our job is to monetize the claims, to figure out
3 what the actual values are. So our job is to get the
4 data from you in as much detail as we can in order for
02:20 5 that value to be as much as it can before you file a
6 claim.

7 Go ahead, Sam.

8 MR. ROECKER: Yeah, we've got somebody
9 listening on-line whose insurance company did not
02:20 10 require an itemized list for their settlement. How do
11 they validate the items that they lost?

12 MR. WATTS: Roy, why don't you take that
13 one.

14 MR. MILLER: Okay. So there are quite a
02:20 15 few insurance companies, especially if you were overall
16 underinsured, one easy way for them to get rid of you is
17 to pay off everything they had in each category. The
18 way to do it is, basically, to make a list, if you can.
19 That includes pictures. And a lot of people have
02:20 20 iPhones or Google phones that have photos from the past.
21 I know that we do. And you'd be surprised at the number
22 of things that you can see on-line on your photos in the
23 background that will help jog your memory regarding the
24 items you had.

02:21 25 We have a template in our group that we

1 share with our clients, and I'm sure the other groups do
2 as well. That template will help you put the list
3 together. And then you get the list to us. In terms of
4 valuation, we would appreciate any insight you may have,
02:21 5 especially if it's an unusual item, but we will do our
6 best to help you with that as well, if needed.

7 But I understand that a lot of people are
8 in the same position you are, that you didn't have to do
9 a list and the idea of now doing a list sounds very
02:21 10 painful. But, as Mikal said, if you don't ask, you
11 don't get. And when you're talking about a lot of us
12 being underinsured, the contents portion of your claim
13 has a significant value, and we want you to be able to
14 capture that value, if you can.

02:21 15 Thank you, Mikal.

16 MR. ROECKER: Yeah, we got Maria --

17 MR. WATTS: Sam, what do we have next?

18 MR. ROECKER: Yeah, Maria wants to know
19 what she needs to do if she sold her lot.

02:22 20 MR. WATTS: Robert, you got -- do you got
21 thoughts on that?

22 MR. BRYSON: Sure. Well, we discussed
23 this in one of the prior town halls, I think I in
24 particular did, and what -- what we need is we need --
02:22 25 well, Robins -- for Robins Cloud clients, we've hired

1 some real estate appraisers to help us to appraise the
2 value of the property immediately before the fire and
3 then after the fire. If you happen to have appraisals
4 that are close in time, of course, I think all the firms
02:22 5 would want to see those. And then we would also want --
6 well, that would be the primary focus, as far as I'm
7 concerned, to assist us in order to evaluate the
8 diminution in value of the property. So in that
9 scenario, you're not going to be in a situation where
02:22 10 we're looking for rebuild because you don't own the
11 property anymore. What we're looking to is the
12 diminished value in the property, and the way we do
13 that, as I already indicated, is by comparing the value
14 shortly before the fire versus immediately or shortly
02:23 15 after the fire. That's the general mechanics of it.

16 And the appraisals help us in that quest.

17 MR. WATTS: Okay. What's next, Sam?

18 MR. ROECKER: Yeah, we've got Rene. Rene
19 wants to know if they didn't have insurance and got
02:23 20 money from FEMA, is that money going to be deducted from
21 their settlement?

22 MR. WATTS: Let me answer that. I mean,
23 originally, yes, but I believe that as part of our
24 settlement with FEMA, that the answer is now no. So I
02:23 25 don't believe that you're going to be asked for FEMA

1 reimbursement.

2 Go ahead, Sam.

3 MR. ROECKER: Yeah, Dorothy has another
4 question on their claims. She wants to know when
02:23 5 they're going to be able to have one-on-one meetings to
6 discuss everything and make sure that their lists are in
7 good shape.

8 MR. WATTS: Well, what we -- you know, our
9 plan was to be out in Santa Rosa and in Chico having
02:24 10 those one-to-one meetings right now. That's really a
11 question for the Governor of the State of California and
12 board of supervisors of each county, right. Our
13 information is that Butte County is following the
14 dictates of the State. Sonoma may have more stringent
02:24 15 requirements. So we don't know the answer.

16 But in the same way that we planned on
17 doing these town halls in person, over the last six
18 weeks we've done them telephonically, what we've done is
19 we're going to have a ton of people calling and
02:24 20 contacting and working on this remotely. And while it's
21 frustrating, I mean, I don't know what to do. I mean, I
22 can't make the coronavirus go away. So we're going to
23 do it remotely for as long as we need to, and then as
24 soon as the State and Butte County and Sonoma County
02:24 25 opens up, then -- you know, I've got two offices I'm

1 paying rent on right now, one in Chico and one in Santa
 2 Rosa, and we've got plenty of space to do those
 3 in-person meetings. We just can't do them yet. So as
 4 soon as we can, we'll transform our digital effort, our
 02:25 5 remote effort, into an in-person effort.
 6 And, you know, my wife already knows I'm
 7 going to be in Northern California for a lot of the next
 8 six months, but I have to wait for Governor Newsom to
 9 let. So right now we're -- you know, we're going to do
 02:25 10 it remotely. But once we know that we can do it in
 11 person, we're going to start doing it in person.
 12 MR. ROECKER: Okay. Next we have Dan.
 13 Dan still has 10 to 12 trees that need to be cut down.
 14 He wants to find out if he can still add those to his
 02:25 15 claim. And then overall, there is just questions on how
 16 trees will be dealt with overall.
 17 MR. WATTS: Yeah, I think the answer is
 18 yeah.
 19 Roy, can you get your wife who's behind
 02:25 20 you to answer that question? No, Roy Miller, go ahead.
 21 MR. MILLER: Yeah, the answer is yes. The
 22 whole situation with trees has been really difficult for
 23 folks that have larger lots, because it costs money to
 24 take down trees, especially trees that are in areas that
 02:25 25 could impact your home. So the cost to remove trees

1 should definitely be included in your claim.
 2 We in the other groups are employing
 3 arborists that are going to go over using your photos
 4 and satellite photography, both, to be able to evaluate
 02:26 5 the value. We are waiting for final claims rules
 6 regarding how the tree loss will be evaluated. There
 7 are a couple different ways to do it. But any
 8 documentation you have about tree loss and the cost that
 9 you went through in order to clear trees, we definitely
 02:26 10 want that included in your claim, regardless of which
 11 group you belong to.
 12 Thank you, Mikal.
 13 MR. WATTS: Okay. Sam, who's next?
 14 MR. ROECKER: Yeah, John. John is a
 02:26 15 renter. He wants to know what renters need to do to
 16 make sure that they get their settlement.
 17 MR. WATTS: Robert, do you want to answer
 18 that?
 19 MR. BRYSON: Sure thing.
 02:26 20 So renters, equally important. First
 21 thing that comes to mind is what Mikal has been talking
 22 about as well as Roy, in particular Roy, is assisting us
 23 in providing -- whoever your law firm is, providing us
 24 with your content list. For our firm, we have a number
 02:27 25 of folks that have been focused on this for years now.

1 And if you have questions, we have a preprinted form
 2 that can assist you, similar to the Watts group. And we
 3 have some very smart folks that are very experienced in
 4 helping me put those together, giving you suggestions.
 02:27 5 And then we also have a slew of personal property
 6 appraisers, if you happen to have something that's
 7 particularly unique that might need a special
 8 evaluation. So that's one side of the equation.
 9 The other side of the equation would be
 02:27 10 for you to provide us with your personal statement of
 11 what impact the fire had on you and your family. And it
 12 can be handwritten, it can be typed, it can be in
 13 whatever format; but I know all the law firms are
 14 looking for that information, because that's another
 02:27 15 very important aspect of your potential recovery.
 16 So if you have a family, say, for example,
 17 yourself, your wife, and two kids, that's four
 18 individuals who have four separate claims for the pain
 19 and suffering that they suffered associated with the
 02:28 20 fire, escaping from the fire, etcetera. So those are
 21 the two primary components when it comes to renters.
 22 MR. WATTS: All right. Who's next?
 23 MR. ROECKER: Yeah, Ray has a question on
 24 homeowners, again. He wants to know for properties that
 02:28 25 didn't burn all the way to the ground, but had a loss in

1 value, do you have any insight on how those claims will
 2 be determined?
 3 MR. WATTS: Roy?
 4 MR. MILLER: Sure. So there are a couple
 02:28 5 different ways that it'll be looked at. There -- either
 6 you're going to be looking at the cost to repair the
 7 property which was damaged and you deduct the insurance
 8 money that was put towards the damage or you're looking
 9 at what's called diminution of value, depending on the
 02:29 10 situation. But almost certainly if your home was
 11 damaged but not destroyed, you repaired it. And,
 12 presumably, you had at least some insurance coverage for
 13 that damage. That insurance coverage is deducted off
 14 your award.
 02:29 15 However, pain and suffering, emotional
 16 distress, because if your home was damaged, you had
 17 to -- almost certainly had to flee. If you had to flee,
 18 you incurred emotional distress. If you were out of
 19 your home while your home was being repaired, you have
 02:29 20 emotional distress on top of that. So you're most
 21 likely going to look at the cost to repair minus
 22 insurance, but add back in emotional distress to your
 23 situation.
 24 Thank you, Mikal.
 02:29 25 MR. WATTS: Great.

1 Sam, who's next?
 2 MR. ROECKER: Yeah, Paul has a question
 3 about the vote today. He said he heard that 55 percent
 4 of the victims had voted, but wants to know if there is
 02:29 5 a minimum percentage needed for the verdict to be
 6 accepted by the Court.
 7 MR. WATTS: Sure, Paul, let me answer
 8 that. I think it's 11 U.S.C. 1126, if I'm not mistaken.
 9 I may be wrong. But the bottom line is that it's the
 02:30 10 percentage of the votes cast, and so people who don't
 11 vote, no offense, don't count for purposes of the
 12 calculation. It's of the people who vote, two-thirds of
 13 them have to vote to accept in order for the plan to be
 14 confirmed.
 02:30 15 Go ahead.
 16 MR. ROECKER: Yeah, a similar question on
 17 that. It looks like Andrea, she just wants to know if
 18 they don't vote for some reason or don't get a chance
 19 today, are they still eligible to receive part of the
 02:30 20 settlement.
 21 MR. WATTS: Yeah, Andrea, absolutely. I
 22 mean, we're trying to get all the clients to vote, but
 23 just because you don't vote doesn't mean you become a
 24 non-person.
 02:30 25 MR. ROECKER: And then Jan wants to know

1 So at its core, a business loss claim has
 2 two components. No. 1 is what I'd call the physical
 3 property loss. Did your business location burn down and
 4 what was the value of that and what's the cost to
 02:32 5 replace it.
 6 And then, secondly, is is businesses
 7 produce income. So what's the lost income. So what
 8 we're going to need is we're going to need tax returns
 9 or quarterly statements as to what the income was going
 02:32 10 to be quarter before, quarter after, or the year before,
 11 the year after, so we can do a comparison to show what
 12 the results is since the fire.
 13 If you have a business in Paradise, I
 14 mean, obviously, it's not going to restart anytime soon,
 02:32 15 so we'll have to project that forward. But we do look
 16 at tax returns the year before versus the year after the
 17 fire. That's primarily what we're going to do.
 18 Sam.
 19 MR. ROECKER: Next we have Mark, who would
 02:32 20 like to know how they are able to prove that they were
 21 there the day of the fire.
 22 MR. WATTS: Roy, you want to take a shot
 23 at that?
 24 MR. MILLER: Sure.
 02:33 25 In -- in any case involving evidence, your

1 if they sold their lot, are they still able to claim
 2 personal property losses.
 3 MR. WATTS: Robert, you got an answer to
 4 that?
 02:30 5 MR. BRYSON: Yes. I'm going to draw a
 6 distinction between your real property, if you -- if you
 7 sold it, you can't recover the cost to rebuild it
 8 because you no longer own it. In contrast, your
 9 personal property, that doesn't affect your personal
 02:31 10 property. So, yes, the short answer is yes. And then
 11 just keep in mind what both Roy, myself, and Mikal
 12 discussed about the importance of getting us your
 13 contents list as soon as possible.
 14 MR. WATTS: Great.
 02:31 15 We've got about 29 minutes left. Sam,
 16 keep going.
 17 MR. ROECKER: Yeah, star 3, if anybody
 18 else has a question, or you can type it on-line to us.
 19 It looks like Kirk wants to know what
 02:31 20 information he'll need to show business income loss.
 21 MR. WATTS: So, Kirk, this is Mikal Watts.
 22 We are going to be working on that beginning this week.
 23 Again, we don't have the final claims rules. They're
 24 not going to be out until about July 1, but we have a
 02:32 25 pretty good idea what they're going to do.

1 own testimony, your own statement is evidence in and of
 2 itself. You would be -- you could provide a statement
 3 to your lawyer as to your story of survival. I know a
 4 bunch of our clients did that for us. For them it was a
 02:33 5 way for them to be able to process what happened.
 6 The other is possibly if you wound up in a
 7 hotel, hotel receipts, your insurance company, if you
 8 evacuated, may have helped you with an initial payment
 9 under your loss of use part of your policy. All of
 02:33 10 those things could go towards proving it.
 11 But we obviously have a map overlay of
 12 every home that was affected by the various fires. If
 13 your home was in the middle of that area, it's not going
 14 to be hard to show that you were affected and you almost
 02:33 15 certainly had to flee.
 16 Thank you, Mikal.
 17 MR. WATTS: Sam.
 18 MR. ROECKER: Yeah, we've got a tax
 19 question from Robert. Robert says he owns PG&E stock
 02:34 20 currently and wants to know what will happen to that
 21 once the bankruptcy is complete.
 22 MR. WATTS: Robert, you want to take a
 23 shot at that?
 24 MR. BRYSON: So you're a stockholder, and
 02:34 25 you're wondering once the bankruptcy is complete, what

1 is that going to have an impact on your stock. Well, as
 2 has been discussed, I think, from -- we don't have our
 3 stock guru with us today, but this is more of a general
 4 understanding. Remember, we're not stock brokers.
 02:34 5 We're not financial advisers. We're attorneys. We hire
 6 folks like that to help us to understand these things.
 7 But, generally, my impression is that -- and history is
 8 the best proof of the future. What happened in the past
 9 is the best indicator of the future. You think about
 02:34 10 this Chapter 11. Originally PG&E stock dipped and then
 11 it came back with gangbusters during the Chapter 11,
 12 which is remarkable because that's not typical. What we
 13 are dealing with is a very large utility that has a
 14 large customer base. And so the money people on Wall
 02:35 15 Street are very interested in PG&E, and they see it
 16 rebounding, especially as it's been re-cast with new
 17 management and it's going to have a large influx of
 18 moneys from the State of California, if the plan is
 19 passed.
 02:35 20 So my thought process is the stock will
 21 probably be ^ sp gleet once they exit, and, in other
 22 words, you should enjoy a higher value stock price.
 23 But, again, that's just my thought. I'm not an expert
 24 in this, and I don't hold myself out to be as such. I'm
 02:35 25 confident that neither does Mikal or Roy, unless they

1 whether it's necessarily a percentage of some other loss
 2 that you suffered or a stand-alone amount. But it's
 3 always -- it's helpful for context, for these people who
 4 are evaluating a claim to understand what you lost. For
 02:36 5 me, it was those things, it was all of our family
 6 Bibles, it was my ancestor's Civil War store that was in
 7 the Battle of Shiloh. Things -- my entire family
 8 history went up that night and telling my family that
 9 was really painful. That's my story.
 02:37 10 Your story is going to be similar with the
 11 items that you lost, whether or not they would have
 12 fetched a lot of money in an auction. But context is
 13 important. So your lawyer needs to understand what it
 14 is you lost. So the more information you can provide
 02:37 15 us, the better. Then we can provide that context to the
 16 trustee when they're evaluating your claim.
 17 Thank you, Mikal.
 18 MR. WATTS: All right. Who do we have
 19 next?
 02:37 20 MR. ROECKER: Okay. Next we have Robert,
 21 who wants to know if you will need original copies of
 22 documents when they're submitted or if those can be
 23 copies.
 24 MR. WATTS: Oh, no, Robert, copies will be
 02:37 25 fine. You know, we're going to do the best we can. A

1 have some secret experience I'm unaware of, but that
 2 would be the general thought process.
 3 MR. WATTS: Okay. To be fair, Robert --
 4 Robert did stay at a Holiday Inn Express last night, so
 02:35 5 he knows a lot.
 6 Anyway, keep going.
 7 MR. ROECKER: Yeah, next we have Rudy.
 8 Rudy would like some information about how emotional
 9 items that were lost they can't really place a value on,
 02:35 10 how are those dealt with, and then, you know, how they
 11 feel, with just the overall pain and suffering dollar
 12 amount.
 13 MR. WATTS: Roy, would you answer this and
 14 tell us a little bit about your cat and -- and, I mean,
 02:36 15 it's real. Tell us about this.
 16 MR. MILLER: There are a ton of things
 17 that all of us lost that don't necessarily have a high
 18 dollar value. For example, I lost all of my
 19 grandfather's sermons. He was a Methodist minister and
 02:36 20 Army chaplain during World War II. That is not
 21 something that's going to necessarily fetch a
 22 high-dollar amount on the open market, but that is an
 23 example of emotional distress.
 24 Now, we're waiting on the trustee rules as
 02:36 25 to how they're going to calculate emotional distress,

1 lot of the originals burned up in the fire. Digital
 2 copies of anything is going to be good enough.
 3 Go ahead, Sam.
 4 MR. ROECKER: Another question on trees
 02:37 5 from Scott. He has 2 acres of charred trees that need
 6 to be removed. He wants to know if the settlement will
 7 cover the cost of removal of the trees and the stumps.
 8 MR. WATTS: Scott, my inclination is you
 9 need an estimate for the cost of removal, and then we'll
 02:38 10 submit those and apply those to be a recoverable cost.
 11 Go ahead, Sam.
 12 MR. ROECKER: Yeah, Danny would like to
 13 know what documentation needs to be turned in for claims
 14 including PTSD.
 02:38 15 MR. WATTS: Robert, do you want to take a
 16 shot at that?
 17 MR. BRYSON: Sure. This is an important
 18 issue, because a lot of folks have been impacted not
 19 only by the fire and the fear of the fire, but also the
 02:38 20 loss of their homes and everything cherished in their
 21 homes. So the short answer is, and I think it was
 22 alluded to before, if you sought medical care from a
 23 mental health professional or even if it was you
 24 consulted with your primary care physician and they
 02:38 25 might have prescribed something to help you, all the

1 lawyers that are assisting their clients would want
2 receive those medical records and the cost of that
3 treatment. And if you have insurance, we're going to
4 want to know that, too, because we're going to want your
02:39 5 explanation of benefits or EOB. So the sooner you can
6 get us that information, the better.

7 And, also, we would want, again, your
8 personal statement in which you outlined what happened
9 to you. And we understand it's not going to be an easy
02:39 10 thing to do, but you need to help your lawyers and arm
11 us with information, because we're your voice. We're
12 the ones that bring to light what happened to you, and
13 the only way we can do that is if we're able to get that
14 information.

02:39 15 And Roy spent a little bit of time talking
16 about that. So his comments dovetail with mine.

17 MR. WATTS: Sam.

18 MR. ROECKER: Next, Mikal, we've got
19 Leonard, who is one of your clients in the Camp Fire.
02:39 20 He says that he turned in his itemized list to the
21 office last year, but he wants to know what else he will
22 need to do for the settlement.

23 MR. WATTS: So, Leonard, we've got your
24 list. We'll have somebody call you to go through it.
02:40 25 Obviously, if there is something you forgot or if you

1 can improve the list, we're going to give you that
2 opportunity. And then we'll have somebody call you and
3 just literally go through every data field that's in our
4 database and challenge you, hey, can you give us more
02:40 5 about this, can you give us more for that. And the
6 answer is either yes or no. But at some point in time
7 we're going to be in a situation where, hey, we have all
8 the information we need or are you ready to file a
9 claim. Because speed versus amount is going to be the
02:40 10 dichotomy here. Those who get their claims done earlier
11 will get paid earlier. Those that wait in order to
12 maximize the amount may get paid more, if they can
13 improve it. That's really what we're doing.

14 So we're trying to just, as we did two
02:40 15 years ago and last year, get as much of your information
16 into the database so we can get you paid on earlier,
17 because I want to get you paid sooner rather than later.

18 Sam.

19 MR. ROECKER: Yeah, next we've got Cliff.
02:41 20 Cliff wants to know, how will clients be able to know
21 once everything is required -- everything required is
22 turned in and then their claims are completed.

23 MR. WATTS: So, Roy, you want to take a
24 shot at that?

02:41 25 MR. MILLER: Sure. So what you're going

1 to be doing is you're going to be working with your
2 lawyer to finalize all the documentation and then that
3 documentation is part of your claim and that claim gets
4 submitted to Brown & Greer, which is the logistics firm
02:41 5 that's working on behalf of the bankruptcy court and
6 they apply the rules to come up with a proposed form of
7 payment. You're going to get notified of that, as will
8 your lawyer.

9 If you accept that form of payment, then
02:41 10 you get paid probably within 30 days. If you do not,
11 there is a layer of review within Brown & Greer if you
12 and your lawyer think that the rules were not applied
13 correctly. Otherwise, they will be referred to neutral
14 evaluators on behalf of the trustee. The final word
02:41 15 will be from the trustee himself, if you want to take it
16 that far.

17 But each step of the process, you will be
18 notified through your lawyer, if you have one, that this
19 is where your claim is. If you do not have a lawyer and
02:42 20 you represent yourself, you need to make sure that you
21 have the correct information on file with Brown & Greer.

22 Thank you, Mikal.

23 MR. WATTS: Go ahead. Sam.

24 MR. ROECKER: Yeah. Yeah, next we've got
02:42 25 Rod. Rod has two houses that he lost in the Paradise

1 fire. Will each one be a separate claim?

2 MR. WATTS: So, Rod, let me answer that.
3 If you filed one claim, then you're going to file them
4 both as identical claims or together in one. If you
02:42 5 filed two separate claims before the notice of deadline
6 on December 31st, they'll treat them as two. Either
7 way, you're going to be able to be paid on both.

8 Sam.

9 MR. ROECKER: Yeah. Suzie lost her job
02:42 10 due to the Camp Fire. What kind of proof do I need to
11 send in showing loss of income?

12 MR. WATTS: Roy, do you want to take a
13 shot at that?

14 MR. MILLER: Sure.

02:43 15 So it depends on how you were employed.
16 If you were a W-2 wage earner, the copies of your most
17 recent pay stubs prior to the fire would be what would
18 help your lawyer prove up your wage loss claim. If you
19 were self-employed, then we need your financial records.
02:43 20 That would hopefully be something like QuickBooks or
21 other financial software printouts. It can be, also,
22 your tax returns from year to year to demonstrate a drop
23 in income.

24 So business losses, in a way, are easier
02:43 25 for us to help prove on your behalf, simply because

1 businesses these days have most stuff computerized.
 2 Income and expenses are all there for tax purposes. So
 3 you just get the documentation to your lawyer. That'll
 4 be part of the business portion of your claim that we
 02:43 5 then submit to the bankruptcy court.
 6 Thank you, Mikal.
 7 MR. WATTS: Go ahead, Sam.
 8 MR. ROECKER: Yeah, we've got Shawna. She
 9 wants to know, regarding the contents list, are those
 02:44 10 amounts going to be depreciated in the settlement and,
 11 if so, by what amount.
 12 MR. WATTS: Robert, do you want to take a
 13 shot at that?
 14 MR. BRYSON: Sure.
 02:44 15 The items, your -- your personal property,
 16 there is a depreciation factor, and the amount is going
 17 to depend on a number of different elements. For
 18 example, if it's brand new, in excellent condition, then
 19 the depreciation is going to be significantly less than
 02:44 20 if it was something that was old and had -- its
 21 usefulness has expired and it's going to have a higher
 22 depreciation, and that's going to also depend upon the
 23 type of personal property. So there isn't -- there
 24 isn't one blanket application. And so what we're doing,
 02:44 25 at least Robins Cloud clients, we're working with our

1 appraisers to help us understand how best to apply
 2 depreciation.
 3 Now, what will also factor in is whatever
 4 depreciation your insurance company applied. That isn't
 02:44 5 to say that we accept that, but it's going to be
 6 something that's considered in the analysis.
 7 MR. WATTS: Sam.
 8 MR. ROECKER: Next, we've got Lillian.
 9 Lillian doesn't have a computer or a fax machine, but
 02:45 10 wants to know if there will be an opportunity for her to
 11 be able to drop off paperwork in person to complete her
 12 claim.
 13 MR. WATTS: Yes, Lillian, that's
 14 absolutely true. I didn't pick up on the question of
 02:45 15 whether you were in Chico or whether you were in Santa
 16 Rosa. If you're in the North Bay area, you can stop by
 17 our office, and the same thing with Chico. One is on
 18 California Street. One is on Stony Point. But, yeah,
 19 just e-mail us, Watts Guerra. We've got offices in
 02:45 20 each. Right now they're both closed because you can't
 21 have anybody there. But it feels like everything is
 22 about to reopen and both of them are going to be reopen
 23 quickly. So, yes, you can bring the documents by.
 24 Go ahead.
 02:45 25 MR. ROECKER: Yeah, next we have Stewart.

1 Stewart wants to know what kind of information needs to
 2 be included for personal injury claims and what kind of
 3 doctor's records and everything else do they need to
 4 make sure that they send in.
 02:46 5 MR. WATTS: Roy, do you want to take a
 6 shot at that?
 7 MR. MILLER: Sure. If you were injured in
 8 the escape or immediate aftermath of the fire, what your
 9 lawyer will need is a medical release form along with
 02:46 10 knowing where you were treated. So once you sign the
 11 release, your lawyers can then go to the medical
 12 providers, be it a hospital or a doctor's office, and
 13 then go ahead and present that information as part of
 14 your claim. So --
 02:46 15 MR. ROECKER: Mikal, I think we lost -- it
 16 looks like we lost Roy briefly. We'll try to get him
 17 back on the line. Do you want to finish answering that
 18 question?
 19 MR. WATTS: Yeah, I mean, I think Roy was
 02:46 20 going right. If you have personal injuries, we need the
 21 medical records, we need to know what happened, and we
 22 need details of it. If you have records, anything,
 23 about, you know, recovering from the injuries that you
 24 sustained during the night of the fire.
 02:47 25 Go ahead, Sam.

1 MR. ROECKER: Yeah, we've got Matt and a
 2 couple others with specific questions about business
 3 claims. Can you just talk broadly about how business
 4 claims are included as part of the settlement and what
 02:47 5 they need to provide to their attorneys?
 6 MR. WATTS: Robert, do you want to take a
 7 shot at that?
 8 MR. BRYSON: Sure, could I get a repeat on
 9 that? I was having some technical difficulties.
 02:47 10 MR. ROECKER: Yeah, the question is just
 11 overall on business claims, just confirming that they're
 12 a part of the settlement and then what they need to
 13 provide to their attorneys to make sure that those are
 14 included.
 02:47 15 MR. BRYSON: They are definitely part of
 16 the claim. For our Robins Cloud clients, we have quite
 17 a few folks that suffered business losses. And Mikal
 18 spoke to that a moment ago, about some of the
 19 information you would need, which could include your tax
 02:47 20 returns. Also, it could include quarterlies, it could
 21 include profit-and-loss statements, your payables,
 22 receivables.
 23 For example, many of the folks we're
 24 working with, they had QuickBooks. You're able to run
 02:48 25 reports in Excel format and all different types of

1 reports. And if you have a history of two to three
 2 years going back, I know for Robins Cloud we would
 3 appreciate receiving that, especially in an Excel format
 4 because it accelerates our ability to properly evaluate
 02:48 5 your claim in conjunction with our experts that are
 6 evaluating the business losses. And then we look to
 7 your P&L, et cetera, other information post fire, and
 8 then that helps us come up with your business loss.
 9 MR. WATTS: Okay. We've got about 12
 02:48 10 minutes left, Sam. What else do we have?
 11 MR. ROECKER: Yeah, kind of a unique
 12 question from Corinne, who she says that they purchased
 13 a home that they were planning on renting out. Are they
 14 able to include their loss in future rent as part of
 02:48 15 their settlement?
 16 MR. WATTS: Robert, do you got -- do you
 17 got an answer to that?
 18 MR. BRYSON: Loss of future rent, the
 19 answer would be yes.
 02:49 20 MR. WATTS: Great. Sam.
 21 MR. ROECKER: Okay. Gayle, her husband,
 22 unfortunately, passed away. She wants to know what
 23 information she needs to provide to make sure she's able
 24 to continue with his claim.
 02:49 25 MR. WATTS: So, Gayle, this is Mikal

1 Watts. I'm sorry for your loss.
 2 If there is, you know, administration of
 3 the estate or a will that says you're in charge of the
 4 claim, we need that, something that gives you capacity
 02:49 5 to continue on the process.
 6 Go ahead, Sam.
 7 MR. ROECKER: Yeah, and, Mikal, it does
 8 look like we've got Roy back on the line, just so you
 9 know.
 02:49 10 Roxanne says she's already submitted her
 11 contents list and wants to know is it too late for her
 12 to send in her survival statement.
 13 MR. WATTS: Roxanne, the answer is no, you
 14 can send in whatever you want. We don't have a deadline
 02:49 15 yet. I know I've been pushing my clients too hard.
 16 Obviously, we've asked you for as much information as
 17 you can give us, as long as you can. But it's not too
 18 late. So send in whatever you can. Okay.
 19 Go ahead, Sam.
 02:50 20 MR. ROECKER: Next, we've got Darlene, who
 21 is a client from the 2017 wildfires. She wants to make
 22 sure that every -- all the information that she would
 23 have provided back then is still on file with her
 24 attorneys. What should she do?
 02:50 25 MR. WATTS: Roy, do you want to take that?

1 MR. MILLER: Sure. So what we've done,
 2 and I'm sure the other groups have done something
 3 similar, is that on an ongoing basis we've been asking
 4 you for all the information that you have from your
 02:50 5 insurance provider, from your contents list, medical
 6 information, if applicable, everything. What we intend
 7 to do is send out information to you--all that this is
 8 what we have, and we're setting up an appointment with
 9 you to review your claim with you. So if you think that
 02:51 10 there is additional documentation, after looking at the
 11 list, that you think is missing, get it to us. Either
 12 upload it to us, mail it to us, e-mail it to us, so that
 13 way both you and us are on the same page regarding what
 14 your claim is all about. We have that final meeting to
 02:51 15 make sure it's all squared away. Then we get the claim
 16 put in.
 17 Thank you.
 18 MR. ROECKER: Next, we've got Sharon.
 19 Cheryl had a total -- Sharon had a total loss on her
 02:51 20 structures. She's tried to sell the lot a couple times
 21 and even after lowering the price, it hasn't sold. With
 22 the claims process starting now, is there any reason she
 23 should or should not put that prop- -- that lot back on
 24 the market, or should she wait until this is all done?
 02:51 25 MR. WATTS: Well, the one challenge is you

1 get the cost to replace if you show a present intent to
 2 rebuild. If there is documentation that you don't
 3 intend to rebuild, you get the market value of the house
 4 the night before the fire. One is about 40 percent
 02:52 5 lower than the other. So that's the consequence of
 6 selling. But I'm not -- I always tell my clients, do
 7 not let your lawsuit get in the way of your life. If
 8 you need to sell, sell. It shows you don't intend to
 9 rebuild, so you get the value of the house the day
 02:52 10 before the fire.
 11 Hey, let me say one more thing. Roy just
 12 sent me a text. So there's been some question about
 13 whether this Kincade Fire is going to be paid out of the
 14 \$13.5 billion. The answer is no. It's what's called a
 02:52 15 post-bankruptcy administrative claim. I think the
 16 paperwork says that Kincade is not included. Roy is
 17 less sure about it. We're partners. He's going to file
 18 an objection today to the plan confirmation, not because
 19 he doesn't think it's a good plan, because he wants to
 02:52 20 make sure that it's addressed in court, the issue of
 21 Kincade was not included with these claims. Those
 22 Kincade claims are something that can be pushed off
 23 later. I agree with his effort.
 24 But just know that whether it's already in
 02:52 25 the document or whether it's after Roy files his

1 objection, we're going to be good. Kincade claims are
 2 insured claims for 2019. They're not coming out of the
 3 13.5 billion. And, frankly, I don't think they're going
 4 to consequently affect the value of the stock. We want
 02:53 5 to let you know that Kincade claims are going to be
 6 separate.
 7 What else, Sam?
 8 MR. ROECKER: Yeah, Judith lost a mobile
 9 home in the fires. And she wants to know, does she need
 02:53 10 to replace that with another mobile home or would she be
 11 able to rebuild as a house, if she'd like to.
 12 MR. WATTS: You can rebuild as a house.
 13 What we use is the value of the mobile home that you
 14 lost. It should be pretty easy to figure out.
 02:53 15 Go ahead, Sam. We got about seven
 16 minutes.
 17 MR. ROECKER: Yeah. Monica escaped the
 18 Camp Fire. When she writes her personal statement,
 19 should she also include family members that she called
 02:53 20 during escaping, so that she can add -- so that those
 21 statements can be added to her story?
 22 MR. WATTS: Mr. Bryson, go ahead.
 23 MR. BRYSON: We -- just to be clear, we
 24 will take any and all information that helps us to
 02:54 25 present the picture of what you endured. So whoever

1 Go ahead, Sam.
 2 MR. ROECKER: Yeah, Don had a question
 3 about he wants to know when the vote on the settlement
 4 will be made public.
 02:55 5 MR. WATTS: So the vote is going to end in
 6 about three and a half hours or three hours and five
 7 minutes. So you need to get the vote in. And then
 8 they'll start counting them as soon as we can. We
 9 designed the vote where, you know, largely it's being
 02:55 10 submitted digitally. So it shouldn't take that long.
 11 My expectation, you'll have a pretty good idea of what
 12 the preliminary vote is before the estimation hearing on
 13 May 21. You'll certainly have a clear report about what
 14 the vote is before the confirmation hearing on May 27.
 02:55 15 Go ahead, Sam.
 16 MR. ROECKER: Yeah, Lee says that he's
 17 working on his contents list. He wants to know if he
 18 should go ahead and send his in while his wife continues
 19 to works on hers. How would you prefer those submitted?
 02:56 20 Do you want people to send one per household or just one
 21 as they're finished?
 22 MR. WATTS: It'd be good if it was one per
 23 household, but, obviously, if your wife is slacking off
 24 and you're ready to go, you can send it to us and then
 02:56 25 supplement. We just want to make sure we have the

1 your lawyer is, they would very much appreciate all
 2 information, whether that's additional contact
 3 information from folks or if those folks have a story
 4 that they want to supplement yours with, whether that be
 02:54 5 a handwritten note or something that they e-mail in or a
 6 Word document, whatever the case may be. All
 7 information is welcome that will help us to -- to
 8 present what happened to you, unfortunately, in the
 9 fire.
 02:54 10 MR. WATTS: Sam, what's next?
 11 MR. ROECKER: Yeah, next we have Michelle.
 12 Michelle just wants to be sure. She has attorneys
 13 calling her to speak with the claim. What kind of
 14 verification will they be looking for to make sure
 02:54 15 they're speaking to an attorney and not somebody else
 16 trying to call and get information from her.
 17 MR. WATTS: Okay. Well, I think that's an
 18 important question. If you don't recognize the attorney
 19 or don't see a call-in number from your attorney's
 02:55 20 office, beware. I mean, there's fraudsters out there,
 21 and we don't want you to be victimized by them.
 22 Remember, if an attorney calls you, you don't have to
 23 answer. You can get their number and call them back.
 24 But you should verify that you're dealing with your
 02:55 25 attorney as opposed to somebody trying to rip you off.

1 contents list from whoever is going to get it to us.
 2 MR. ROECKER: Okay. Gary --
 3 MR. WATTS: Go ahead, Sam. We got four
 4 minutes.
 02:56 5 MR. ROECKER: Yeah, Gary wants to know how
 6 the payments will be distributed and, again, if you have
 7 any idea on when and then will those payments -- what
 8 order will those payments be sent out in.
 9 MR. WATTS: Robert, do you want to take a
 02:56 10 shot at that?
 11 MR. BRYSON: Sure. So the when is it
 12 depends, again. The sooner you get in your information,
 13 the sooner we're able to make the proving-up claim for
 14 you, the sooner the administrator is able to process it
 02:56 15 through Brown & Greer, the sooner they will then be able
 16 to, if you accept it, issue the payment, which,
 17 hopefully, will be sometime in the fourth quarter of
 18 December.
 19 And then what was the second part of the
 02:57 20 question?
 21 MR. ROECKER: And in what order are those
 22 payments sent out in.
 23 MR. BRYSON: Oh, it's first come, first
 24 serve. So the quicker you get the materials in to
 02:57 25 either my firm or Watts' or Roy's firms, or your lawyer,

1 the sooner you'll be in line to have your claim
 2 processed and then ultimately paid out, if you accept
 3 it.
 4 MR. ROECKER: Robert wants to know --
 02:57 5 MR. WATTS: Sam, we got two minutes.
 6 MR. ROECKER: Yeah, Robert wants to know
 7 what kind of information he'll need to provide to show
 8 that he owned the property. Do they need to provide a
 9 copy of the deed, or is property tax information
 02:57 10 sufficient?
 11 MR. WATTS: I think either one would be
 12 great. Both are better than nothing. So don't assume
 13 that they're going to accept that you own it. They have
 14 ways of checking. But, yes, either a deed or property
 02:57 15 tax record would be excellent.
 16 Go ahead, Sam.
 17 MR. ROECKER: Steven says that he did a
 18 lot of cleanup himself on his property. Is there a way
 19 to include his time and effort in his claim?
 02:58 20 MR. WATTS: I think you can -- yeah, I
 21 think you can include it. Document your claim. I'm not
 22 saying it's going to get paid. I'm not saying it's not.
 23 But, you know, make a document.
 24 All right, one last question. Let's go.
 02:58 25 MR. ROECKER: Yeah, Jeffrey wants to

1 know -- he lives out of state now. He wants to know if
 2 he'll have to come back to California to complete any
 3 part of his settlement.
 4 MR. WATTS: Jeffrey, I think we're going
 02:58 5 to be able to do it all remotely, especially during
 6 coronavirus time. You know, my expectation is that I'm
 7 going to come back to California to work hand in glove
 8 with the clients, but I'm not going to do it until the
 9 Governor of the State of California says it's safe.
 02:58 10 But we're going to -- you know, we -- the
 11 whole world has created an amazing ability to adapt in
 12 the last six, eight, ten weeks. And we'll continue to
 13 use this. I don't think you're going to have to pay for
 14 an air flight to come out there to meet with us. We can
 02:59 15 do it over the phone. We can do it via Zoom. You know,
 16 as long as you -- as long as you let us know where you
 17 are and how we can contact you, we will contact you.
 18 All right, guys, it's 3:00 o'clock. We've
 19 only got an hour today. Expect another telephonic town
 02:59 20 hall after the confirmation. So today is the 15th. If
 21 I had to bet, I would say somewhere around June 1, when
 22 we have more information about the claim process, we'll
 23 get back on and we'll do this again. I don't know of
 24 any way to inform my clients via a telephonic -- I mean,
 02:59 25 via any kind of town hall while we're under shelter in

1 place, so we're going to keep doing these.
 2 But the best guess, okay, is June 1ish,
 3 we'll get back with you and give you a new update.
 4 Hopefully, we'll have a lot more detail about how to do
 02:59 5 the claims. We're going to do that. We'll probably hit
 6 you with an e-mail -- I know Joe Earley and Roy Miller
 7 like to send out Friday afternoon e-mails, you know, to
 8 keep everybody up to speed. We'll do that.
 9 When we get the vote, we'll do that. In
 03:00 10 six days we'll have the estimation hearing. We'll let
 11 you know about that. And then in 12 days, we'll have
 12 the confirmation hearing. And we believe -- and I'm not
 13 saying I know what the Judge is going to do, but if more
 14 than two-thirds of the fire survivors vote in favor of
 03:00 15 the settlement, it's my very strong belief that this
 16 Judge will vote to confirm it. If you vote against it,
 17 then that answer is different.
 18 So it's 3:00 o'clock. We're going to get
 19 cut off. Thank you for being on the line. If you have
 03:00 20 any questions and you're from the Camp Fire, e-mail us
 21 at chico@wattsguerra.com. North Bay Fires -- I mean any
 22 questions and you're from the North Bay Fire, e-mail us
 23 at santarosa@wattsguerra.com. If you're Robert Bryson's
 24 clients or somebody else's clients, obviously e-mail
 03:00 25 your own lawyer and seek advise from your lawyer.

1 Thank you for participating today. And,
 2 Mr. Bryson, Mr. Miller, thank you for your wisdom. And,
 3 again, it's 1:00 o'clock. Get your vote in. You're out
 4 of time. Thank you guys. Bye-bye.
 5
 6
 7
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

1 I, PHYLLIS WALTZ, a Texas Certified Shorthand Reporter,
2 Texas Certified Realtime Reporter, Louisiana Certified
3 Court Reporter, Registered Merit Reporter, Certified
4 Realtime Reporter, and Certified Realtime Captioner in
5 and for the State of Texas, certify that the foregoing
6 is a correct transcription, to the best of my ability
7 from the audio recording of the proceedings in the
8 above-entitled matter.

9
10 I further certify that I am neither counsel for, related
11 to, not employed by any of the parties to the action in
12 which this deposition was taken, and further that I am
13 not financially or otherwise interested in the outcome
14 of the action.

15 Certified to by me this 16TH day of MAY
16 2020.



17
18 _____
PHYLLIS WALTZ, RMR, CRR, CRC

19 Expiration Date: 12/31/20
20 TEXAS CSR, TCRR NO. 6813
21 Expiration Date: 12/31/21
22 LOUISIANA CCR NO. 2011010
Expiration Date: 12/31/20

23 Worldwide Court Reporters, Inc.
24 Firm Certification No. 223
3000 Wesleyan, Suite 235
Houston, Texas 77027
25 (713) 572-2000