

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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In re:	)	
	)	Chapter 11
	)	
EDISON MISSION ENERGY, <u>et al.</u> , <sup>1</sup>	)	Case No. 12-49219 (JPC)
	)	
Debtors.	)	(Jointly Administered)
	)	

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**DECLARATION OF EMILY S. GOTTLIEB IN SUPPORT OF THE PURCHASER PARTIES’ TWENTY-FIFTH AND TWENTY-SIXTH OMNIBUS OBJECTIONS TO CERTAIN PROOFS OF CLAIM (NO-LIABILITY CLAIMS)**

I, Emily S. Gottlieb, declare as follows:

1. I am an Assistant Vice President with GCG, Inc. (“GCG”), the noticing, claims and solicitation agent for the above-captioned debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned proceeding. Our business address is 190 South LaSalle Street, Suite 1925, Chicago, Illinois 60603.

2. I have served in this position since 2011 and am involved and familiar with GCG’s role in providing claims services pursuant to the retention order entered by this Court.<sup>2</sup> Moreover, I am familiar with the status of the claims filed against the Debtors’ estates.

3. I submit this declaration (this “Declaration”) in support of the Purchaser Parties’ Twenty-Fifth Omnibus Objection to Certain Proofs of Claim (No-Liability Claims) (the “25th”

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Edison Mission Energy (1807); Camino Energy Company (2601); Chestnut Ridge Energy Company (6590); Edison Mission Energy Fuel Services, LLC (4630); Edison Mission Finance Co. (9202); Edison Mission Fuel Resources, Inc. (3014); Edison Mission Fuel Transportation, Inc. (3012); Edison Mission Holdings Co. (6940); Edison Mission Midwest Holdings Co. (6553); EME Homer City Generation L.P. (6938); Homer City Property Holdings, Inc. (1685); Midwest Finance Corp. (9350); Midwest Generation EME, LLC (1760); Midwest Generation, LLC (8558); Midwest Generation Procurement Services, LLC (2634); Midwest Peaker Holdings, Inc. (5282); Mission Energy Westside, Inc. (0657); San Joaquin Energy Company (1346); Southern Sierra Energy Company (6754); and Western Sierra Energy Company (1447). The location of the Reorganization Trust’s service address is: 3 MacArthur Place, Suite 100, Santa Ana, California 92707.

<sup>2</sup> See, e.g., *Order Authorizing Employment and Retention of GCG, Inc. as Notice, Claims, and Solicitation Agent for Debtors* [Docket No. 126].

Claim Objection”) and the Purchaser Parties’ Twenty-Sixth Omnibus Objection to Certain Proofs of Claim (No-Liability Claims) (the “26th Claim Objection,” and, together, the “Objections”).

4. Except where specifically noted, the statements in this Declaration are based on my personal knowledge, information supplied or verified by employees or advisors of GCG, or my review of relevant documents. If I were called upon to testify, I could and would testify competently to the facts set forth herein. I am authorized to submit this Declaration on behalf of GCG.

### **BACKGROUND**<sup>3</sup>

5. On April 1, 2014, the Effective Date of the Plan, at the direction of NRG Energy Holdings Inc. (“NRG”), as Purchaser in accordance with the Plan, and having received funding from NRG to do so, GCG prepared and mailed distribution checks to certain parties identified by NRG as being owed Cure Costs on account of executory contracts and/or unexpired leases, as applicable, assumed in accordance with the Plan.

6. Each of the parties listed on Schedule 1 to the 25th Claim Objection and/or Schedule 1 to the 26th Claim Objection (together, the “Schedules”) filed one or more proofs of claim against one or more of the Debtors, as reflected on the Schedules.

7. After the Effective Date, NRG and its consultants worked with GCG to prepare the Schedules, reflecting Paid Cure Cost-Related Claims filed by parties to whom the above Cure Cost payments were made. Each party on the Schedules is a party to whom GCG sent a Cure Cost payment on April 1, 2014 in full and final satisfaction of such claims.

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<sup>3</sup> Capitalized terms used but not otherwise defined in this Declaration will have the meanings ascribed to them in the Objections, unless otherwise noted.

