

# **EXHIBIT A**

# **MATTER 76**

**Matter 76 – Adversary Proceedings & Contested Matter – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/01/03	Carter W Emerson, P.C.	.20	Review filing by committee re staying confirmation.
8/01/03	Matthew N Kleiman	3.30	Review committee motion to stay disclosure statement approval and related exhibits (1.7); telephone conference with client re strategy and tactics for response re same (.7); research re same (.9).
8/04/03	Ross M Kwasteniet	1.40	Research in response to creditors' committee motion to stay plan confirmation process (.6); draft insert for objection to same (.8).
8/05/03	Robert B Ellis	2.00	Review Meyerhoff e-mail re committee discovery requests (.2); review discovery requests (.8); draft letter to Meyeroff re same (1.0).
8/05/03	Matthew N Kleiman	.70	Conference with counsel to creditors committee re continuance of stay proceedings (.4); conduct telephone conference with client re same (.3).
8/06/03	Ross M Kwasteniet	3.10	Draft insert for objection to creditors' committee motion to stay plan confirmation process.
8/06/03	Robert B Ellis	1.00	Telephone conference with G. Meyerhoff re discovery issues (.4); review discovery requests (.3); review materials re e-mail production (.3).
8/06/03	Matthew N Kleiman	4.70	Draft and revise motion to continue stay proceedings (4.4); draft correspondence to client re same (.3).
8/07/03	Matthew N Kleiman	1.40	Review and revise objection to committee's motion to stay confirmation process or terminate exclusivity.
8/08/03	Robert B Ellis	4.80	Review Committee document requests and produced documents (4.3); telephone conference with G. Meyerhoff re e-mail discovery (.5).
8/08/03	Matthew N Kleiman	4.60	Review and revise objection to committee's motion to stay confirmation process or terminate exclusivity (3.6); draft correspondence to client re same (.2); review committee response to motion to continue stay motion (.8).
8/11/03	Robert B Ellis	4.60	Telephone conferences with Exide re document production (.6); review Committee document requests (2.4); review and research privilege issues (1.6).

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/11/03	Matthew N Kleiman	3.80	Review and revise objection to committee's motion to stay confirmation process or terminate exclusivity (3.3); review revised stipulation lifting discovery stay (.5).
8/12/03	Seth B Kutnick	.90	Retrieve and distribute CSFB Complaint per attorney request.
8/12/03	Kenneth Robling	7.30	Review documents re R2 production request.
8/12/03	Timothy D Elliott	.50	Office conferences re Committee discovery (.3); telephone conference with M. Israel and others re document production (.2).
8/12/03	Robert B Ellis	4.80	Review memo re e-mail retrieval re Committee document requests (3.5); telephone conferences with M. Israel and K. Braden re same (.6); telephone conferences with K&E team re document production (.7).
8/12/03	Matthew N Kleiman	4.30	Review and revise objection to committee's motion to stay confirmation process or terminate exclusivity (3.2); review CSFB objection re same and draft correspondence to counsel re comments (1.1).
8/13/03	Kenneth Robling	12.60	Review documents re R2 production request (12.1); prepare for and participate in team meeting re strategy for same (.5).
8/13/03	Robert B Ellis	4.80	Telephone conferences re Committee discovery project (.8); review privilege and responsiveness issues (1.2); review K&E documents for production (2.8).
8/14/03	Frederick L Block	14.30	Review documents for response to unsecured creditor's discovery requests (13.4); office conference re same (.9).
8/14/03	Timothy D Elliott	.50	Correspondence and email communications with various consultants re email production.
8/14/03	Robert B Ellis	5.40	Telephone conferences re Committee discovery project (.4); review privilege and responsiveness issues (2.4); review K&E documents for production (2.6).
8/15/03	Jason D Horwitz	4.80	Telephone conferences with S. Kupinsky re motion to file under seal (.2); office conferences re same (.6); review and analysis of same (.4); research and analysis of case law re attorney-client privilege and attorney work-product issues re same (3.6).

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/15/03	Robert B Ellis	4.80	Review motion to use privileged document (1.5); office conference re same (.3); telephone conference with S. Kupinsky re same (.5); review precedent re attorney-client privilege (2.5).
8/15/03	Matthew N Kleiman	4.10	Review exhibits and prepare for hearing on motion to stay confirmation process (1.8); review committee motion to use confidential document and consultation with S. Kupinsky re same (2.3).
8/16/03	Jason D Horwitz	7.90	Continued research and analysis of case law re attorney-client privilege and attorney work product doctrine re objection to motion filed under seal (3.1); begin drafting objection to same (4.8).
8/16/03	Robert B Ellis	3.60	Legal research re privilege and inadvertent production (3.0); review motion to use privileged document (.6).
8/17/03	Jason D Horwitz	11.20	Continued drafting and revise objection to motion filed under seal.
8/17/03	Robert B Ellis	2.80	Review and revise draft opposition to use privileged document (1.4); review case law re same (1.4).
8/17/03	Matthew N Kleiman	1.20	Review and revise objection to motion to use confidential document.
8/18/03	Jason D Horwitz	9.70	Revise objection to motion under seal (7.5); office conferences re same (1.5); correspond with S. Kupinsky re same (.4); exchange e-mail messages with J. O'Neill re same (.3).
8/18/03	Seth B Kutnick	.90	Retrieve and distribute R2 committee's request for discovery.
8/18/03	Timothy D Elliott	1.20	Telephone conferences with B. Snyder and in-house IT personnel re review of Exide emails.
8/18/03	Robert B Ellis	4.60	Review and revise opposition to motion to use privileged document (4.2); telephone conference with S. Kupinsky re same (.4).
8/18/03	Matthew N Kleiman	1.10	Review exhibits and prepare for hearing on motion to stay confirmation process.
8/19/03	Jason D Horwitz	7.90	Multiple, lengthy office conferences re objection to motion under seal (1.7); multiple lengthy telephone conferenes with S. Kupinsky re same (1.5); revise objection to motion under seal (4.3); telephone conferences with J. O'Neill re same (.4).
8/19/03	Timothy D Elliott	2.00	Review emails for R2 production.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/19/03	Robert B Ellis	3.80	Review and revise opposition to motion to use privileged document (3.4); telephone conferences with S. Kupinsky re same (.4).
8/20/03	Jason D Horwitz	.30	Exchange e-mail messages with J. O'Neill re service of objection to motion under seal.
8/20/03	Matthew N Kleiman	10.40	Prepare for hearing re motion to stay confirmation process and motion to use confidential document (2.1); draft and revise witness outline re L. Donahue testimony (2.1); draft and revise witness outline re C. Muhlhauser testimony (2.5); draft and revise witness outline re C. Powell testimony (2.4); review and revise response to motion to use confidential document (1.3).
8/21/03	Matthew N Kleiman	14.40	Prepare for hearing re motion to stay confirmation process and motion to use confidential document (10.9); conferences with potential witnesses (C. Muhlhauser, L. Donahue, C. Powell) re same (3.2); review stipulation re affidavit testimony re same (.3).
8/22/03	Timothy D Elliott	1.50	Office conference re email production (.4); review emails for production (1.1).
8/25/03	Timothy D Elliott	.50	Telephone conferences re email production and review email production to date.
8/26/03	Robert B Ellis	2.80	Review decision on motion to dismiss (1.2); conferences re status of discovery (.6); review privileged materials (1.0).
8/26/03	Matthew N Kleiman	1.80	Review form of order re motion to use document (.4); review opinion re motion to dismiss committee-prepetition lender adversary proceeding (1.2); conduct telephone conference with S. Kupinsky re same (.2).
8/27/03	Charlotte L Westhoff	.90	Retrieve requested CSFB documents per M. Kleiman.
8/27/03	Melanie D Whitcomb	1.40	Assist T. Elliott in review of emails on cd rom for privilege and relevance.
8/27/03	Matthew N Kleiman	.50	Review status of electronic document review re third-party discovery in committee-prepetition lender adversary proceeding.
8/28/03	Timothy D Elliott	.50	Prepare for and participate in office conference re email production.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/28/03	Robert B Ellis	3.40	Prepare for and telephone conference with M. Israel, K. Braden re status of discovery (.8); review discovery requests (1.2); review privileged materials (.8); draft letter to G. Meyerhoff re same (.6).
8/29/03	Frederick L Block	1.00	Conference with contract attorneys re e-mail review.
8/29/03	Timothy D Elliott	1.10	Prepare for and attend conference with attorneys reviewing emails for production.
	Total hours:	203.10	

# **MATTER 77**



**Matter 77 – Automatic Stay Matters – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/6/2003	Ross M Kwasteniet	1.80	Revise and negotiate terms of stipulation to resolve motion by Boyd, et al. for relief from the automatic stay.
8/7/2003	Ross M Kwasteniet	0.70	Revise and circulate stipulation to resolve motion of Boyd, et al. for relief from automatic stay.
8/7/2003	Matthew N Kleiman	0.50	Review proposed stipulation lifting discovery stay.
8/8/2003	Ross M Kwasteniet	0.70	Finalize stipulation to resolve Boyd et al. motion for relief from automatic stay.
8/20/2003	Jason D Horwitz	0.10	Correspond with E. Hutt re lawsuit relating to prepetition claim.
	Total hours:	3.80	

# **MATTER 80**

**Matter 80 – Case Administration – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/1/2003	Charlotte L Westhoff	0.60	Review docket and update docket images.
8/1/2003	Jordan G Galassie	3.10	Westlaw case precedent research.
8/1/2003	Matthew N Kleiman	4.20	Negotiate and draft St. Paul motion, term sheet and stipulation.
8/4/2003	Jason D Horwitz	1.70	Revise motion to enter into stipulation and agreed order with St. Paul and corresponding term sheet (.6); office conferences re same (.5); exchange e-mail messages with K. Yee and K. DePhillips re same (.6).
8/4/2003	Charlotte L Westhoff	0.80	Review docket and update docket images (.6); retrieve correspondence per E. Chalut (.2).
8/4/2003	Matthew N Kleiman	7.30	Prepare for and participate in telephone conference with client and restructuring professionals re case status and reorganization initiatives (1.0); negotiate and revise St. Paul term sheet, motion and stipulation (5.5); conduct telephone conference with senior lender counsel re same (.5); conduct telephone conference with DIP lender counsel re same (.3).
8/5/2003	Seth B Kutnick	3.10	Retrieve and distribute various orders and corresponding hearing transcripts.
8/5/2003	Charlotte L Westhoff	2.60	Review docket and update docket images (.6); retrieve certificate of service per M. Grummer and correspond with BMC re same (1.1); retrieve due diligence payment order per R. Kwasteniet (.9).
8/6/2003	Jason D Horwitz	0.20	E-mail message to H. Pritchard re penalty assessed for late payment of surety bond (.1); correspond with H. Pritchard re same (.1).
8/6/2003	Claude W Irmis	0.30	Assemble and organize Exide correspondence and pleadings.
8/6/2003	Seth B Kutnick	2.90	Retrieve and distribute various orders and corresponding hearing transcripts.
8/6/2003	Charlotte L Westhoff	0.60	Review docket and update docket images.
8/7/2003	Jason D Horwitz	0.30	Telephone conferences with H. Pritchard re various issues, including the alleged late-payment of a custom duty.
8/7/2003	Claude W Irmis	0.40	Assemble and organize Exide correspondence and pleadings.

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/7/2003	Charlotte L Westhoff	0.60	Review docket and update docket images.
8/7/2003	Matthew N Kleiman	1.30	Negotiation with bank counsel re revisions to St. Paul stipulation (.8); draft correspondence to St. Paul counsel re same (.5).
8/8/2003	Jason D Horwitz	0.60	Exchange e-mail messages with B. Hatcher re prepetition legal fees of officers (.3); review and analysis of motion and order re same (.3).
8/8/2003	Claude W Irmis	0.30	Review and organize Exide correspondence and pleadings.
8/8/2003	Seth B Kutnick	2.50	Began to organize Exide Central file.
8/8/2003	Charlotte L Westhoff	0.60	Review docket and update images.
8/8/2003	Matthew N Kleiman	0.70	Negotiation re revisions to form of stipulation approving St. Paul bonding facility.
8/11/2003	Jason D Horwitz	1.20	Exchange e-mail messages with D. Bloome re proposed stipulation re Ohio PUCO claims (.3); review and analysis of stipulation re same (.4); telephone conference with H. Pritchard re consent decree (.2); office conference re same (.2); e-mail message from H. Pritchard re same (.1).
8/11/2003	Seth B Kutnick	1.60	Continue to organize Exide central file.
8/11/2003	Charlotte L Westhoff	0.60	Review docket and update docket images.
8/11/2003	Matthew N Kleiman	1.10	Prepare for and participate in telephone conference with client and restructuring professionals re case status and reorganization initiatives.
8/12/2003	Rhonda Lopera	0.50	Retrieve and review disclosure statement re case precedent.
8/12/2003	Jason D Horwitz	1.90	Prepare for and participate in Exide team meeting re August 19 omnibus hearing (.5); telephone conferences with M. Satterwhite (.2) and D. Bloome (.2) re settlement with State of Ohio re PUCO claims; revise settlement agreement re same (.6); office conference re same (.1); e-mail message to M. Satterwhite, B. Ferris and D. Bloome re same (.3).
8/12/2003	Erik W Chalut	0.70	Prepare for and attend Exide hearing prep meeting.
8/12/2003	Tracy J McCollom	0.70	Respond to request of M. Kleiman for archived precedent pleading.

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/12/2003	Matthew N Kleiman	1.10	Prepare for and participate in strategy conference re case status, confirmation events and omnibus hearing issues.
8/13/2003	Jason D Horwitz	1.40	Review and revise new draft of settlement agreement re Ohio PUCO claims (.7); e-mail message from M. Satterwhite re same (.1); exchange e-mail messages with D. Bloome re same (.2); letter to T. McNaughton re voluntary petitions (.4).
8/13/2003	Seth B Kutnick	2.20	Retrieve and distribute complaints re opening of new matters.
8/13/2003	Tracy J McCollom	0.20	Follow up on precedent document request.
8/13/2003	Jordan G Galassie	1.40	Obtain multiple pleadings re exclusivity period (1.2); distribute to requesting parties (.2).
8/13/2003	Catherine A Aebischer	1.00	Collect and organize credit documentation for document production.
8/13/2003	Damary Medina	4.00	Review files and pull mortgages, print mortgages legal key images per S. Liang.
8/14/2003	Glen G Mastroberte	1.60	Revise Deutsue Telekom participation rights agreement (1.2); conference with J. Van de North re same (.4).
8/14/2003	Seth B Kutnick	0.90	Retrieve and distribute initial disclosure re Citicorp and Citycapital.
8/14/2003	Tracy J McCollom	0.30	Retrieve and distribute precedent per M. Kleiman's request.
8/14/2003	Maria T DelZoppo	0.50	Fax Exide contact lists to C. Irmis.
8/15/2003	Jason D Horwitz	3.60	Telephone conference with K. Braden re potential payment of a prepetition claim (.3); office cofnerence re same (.2); research and analysis of same (1.0); telephone conferences with M. Satterwhite re settlement agreement re Ohio PUCO claims (.3); exchange multiple e-mail messages with M. Satterwhite, B. Ferris and D. Bloome re same (.5); office conferences re same (.2); revise settlement agreement re same (.9); office conference re OCP issues (.2).
8/15/2003	Catherine A Aebischer	6.50	Review legal key for credit documentation that may be responsive to document requests (3.1); review documents collected from off-site storage for information responsive to document requests (3.4).
8/18/2003	Charlotte L Westhoff	0.60	Review docket and update docket images.

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/18/2003	Matthew N Kleiman	3.10	Revise St. Paul stipulation re negotiation with counsel to agent (.6); prepare for omnibus hearing (2.5).
8/19/2003	Jason D Horwitz	0.20	Telephone conference with K. Braden re potential payment of a prepetition claim.
8/19/2003	Seth B Kutnick	1.90	Retrieve and distribute motion and order to modify OCP levels (1.2); retrieve and distribute transitions services agreement (.7).
8/20/2003	Jason D Horwitz	0.20	Review and analysis of final agreement resolving Ohio PUCO claims.
8/20/2003	Catherine A Aebischer	4.50	Review credit documentation for documents responsive to document requests.
8/21/2003	Jason D Horwitz	0.20	Telephone conferences with H. Pritchard re Income Protection Plan.
8/22/2003	Jason D Horwitz	0.70	Exchange e-mail messages with M. Satterwhite re settlement agreement for Ohio PUCO claims (.3); review and analysis of OCP orders re payment issue (.4).
8/22/2003	Jordan G Galassie	1.10	Prepare notice of appearance.
8/22/2003	Jordan G Galassie	2.80	File notice of appearance with bankruptcy court (1.2); retrieve service list and arrange for service via FedEx (1.6).
8/22/2003	Robert B Rittenhouse	1.50	Assemble binder of board meeting transcripts (.8); create index of all transcripts included in binder (.7).
8/22/2003	Catherine A Aebischer	0.50	Review credit documentation for documents responsive to document requests.
8/25/2003	Jason D Horwitz	0.40	Telephone conference with W. Weekley re payment of prepetition legal fees to officers (.2); e-mail messages from W. Weekley re same (.2).
8/25/2003	Claude W Irmis	1.30	Assemble and organize Exide correspondence and pleadings (.3); coordinate update of pleadings file (.2); retrieve and distribute filed disclosure statement, plan and related blacklines (.5); coordinate retrieval and distribution of Gould Electronics proof of claim materials (.3).
8/25/2003	Jordan G Galassie	2.80	Retrieve multiple SEC reports.
8/26/2003	Charlotte L Westhoff	0.40	Review docket and update image.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/27/2003	Jason D Horwitz	2.60	Telephone conferences with J. Slatkin re BMC adequate protection agreement (.4); office conference re same (.2); research and analysis re potential payment of prepetition claim (1.4); office conference re same (.2); telephone conferences with K. Braden re same (.3); correspond with D. Bloome re Ohio PUCO settlement (.1).
8/27/2003	Seth B Kutnick	0.90	Prepare Exide customer rebate report for July and coordinate filing with local counsel.
8/28/2003	Jason D Horwitz	0.90	Telephone conference with D. Bloome re Ohio PUCO settlement agreement (.2); correspond with M. Satterwhite re same (.1); office conferences re precedent for plan solicitation letters (.4); exchange e-mail messages with B. Hatcher re ESB settlement notice (.2).
8/28/2003	Seth B Kutnick	2.70	Retrieve and distribute Exide Ann Arbor tape transcription binder.
8/28/2003	Charlotte L Westhoff	1.50	Review docket and update docket images (.6); retrieve, organize and prepare proofs of claim to be sent to various creditors (.9).
8/28/2003	Yosef J Riemer	0.80	Office conference re overview of issues in Exide case.
8/29/2003	Claude W Irmis	0.40	Assemble and organize Exide correspondence and pleadings for file update.
	Total hours:	99.70	

# MATTER 81



**Matter 81 – Cash, Collateral/DIP Financing – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/1/2003	Charlotte L Westhoff	0.60	Review docket and update docket images.
8/1/2003	Jordan G Galassie	3.10	Westlaw case precedent research.
8/1/2003	Matthew N Kleiman	4.20	Negotiate and draft St. Paul motion, term sheet and stipulation.
8/4/2003	Jason D Horwitz	1.70	Revise motion to enter into stipulation and agreed order with St. Paul and corresponding term sheet (.6); office conferences re same (.5); exchange e-mail messages with K. Yee and K. DePhillips re same (.6).
8/4/2003	Charlotte L Westhoff	0.80	Review docket and update docket images (.6); retrieve correspondence per E. Chalut (.2).
8/4/2003	Matthew N Kleiman	7.30	Prepare for and participate in telephone conference with client and restructuring professionals re case status and reorganization initiatives (1.0); negotiate and revise St. Paul term sheet, motion and stipulation (5.5); conduct telephone conference with senior lender counsel re same (.5); conduct telephone conference with DIP lender counsel re same (.3).
8/5/2003	Seth B Kutnick	3.10	Retrieve and distribute various orders and corresponding hearing transcripts.
8/5/2003	Charlotte L Westhoff	2.60	Review docket and update docket images (.6); retrieve certificate of service per M. Grummer and correspond with BMC re same (1.1); retrieve due diligence payment order per R. Kwasteniet (.9).
8/6/2003	Jason D Horwitz	0.20	E-mail message to H. Pritchard re penalty assessed for late payment of surety bond (.1); correspond with H. Pritchard re same (.1).
8/6/2003	Claude W Irmis	0.30	Assemble and organize Exide correspondence and pleadings.
8/6/2003	Seth B Kutnick	2.90	Retrieve and distribute various orders and corresponding hearing transcripts.
8/6/2003	Charlotte L Westhoff	0.60	Review docket and update docket images.
8/7/2003	Jason D Horwitz	0.30	Telephone conferences with H. Pritchard re various issues, including the alleged late-payment of a custom duty.
8/7/2003	Claude W Irmis	0.40	Assemble and organize Exide correspondence and pleadings.

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/7/2003	Charlotte L Westhoff	0.60	Review docket and update docket images.
8/7/2003	Matthew N Kleiman	1.30	Negotiation with bank counsel re revisions to St. Paul stipulation (.8); draft correspondence to St. Paul counsel re same (.5).
8/8/2003	Jason D Horwitz	0.60	Exchange e-mail messages with B. Hatcher re prepetition legal fees of officers (.3); review and analysis of motion and order re same (.3).
8/8/2003	Claude W Irmis	0.30	Review and organize Exide correspondence and pleadings.
8/8/2003	Seth B Kutnick	2.50	Began to organize Exide Central file.
8/8/2003	Charlotte L Westhoff	0.60	Review docket and update images.
8/8/2003	Matthew N Kleiman	0.70	Negotiation re revisions to form of stipulation approving St. Paul bonding facility.
8/11/2003	Jason D Horwitz	1.20	Exchange e-mail messages with D. Bloome re proposed stipulation re Ohio PUCO claims (.3); review and analysis of stipulation re same (.4); telephone conference with H. Pritchard re consent decree (.2); office conference re same (.2); e-mail message from H. Pritchard re same (.1).
8/11/2003	Seth B Kutnick	1.60	Continue to organize Exide central file.
8/11/2003	Charlotte L Westhoff	0.60	Review docket and update docket images.
8/11/2003	Matthew N Kleiman	1.10	Prepare for and participate in telephone conference with client and restructuring professionals re case status and reorganization initiatives.
8/12/2003	Rhonda Lopera	0.50	Retrieve and review disclosure statement re case precedent.
8/12/2003	Jason D Horwitz	1.90	Prepare for and participate in Exide team meeting re August 19 omnibus hearing (.5); telephone conferences with M. Satterwhite (.2) and D. Bloome (.2) re settlement with State of Ohio re PUCO claims; revise settlement agreement re same (.6); office conference re same (.1); e-mail message to M. Satterwhite, B. Ferris and D. Bloome re same (.3).
8/12/2003	Erik W Chalut	0.70	Prepare for and attend Exide hearing prep meeting.
8/12/2003	Tracy J McCollom	0.70	Respond to request of M. Kleiman for archived precedent pleading.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/12/2003	Matthew N Kleiman	1.10	Prepare for and participate in strategy conference re case status, confirmation events and omnibus hearing issues.
8/13/2003	Jason D Horwitz	1.40	Review and revise new draft of settlement agreement re Ohio PUCO claims (.7); e-mail message from M. Satterwhite re same (.1); exchange e-mail messages with D. Bloome re same (.2); letter to T. McNaughton re voluntary petitions (.4).
8/13/2003	Seth B Kutnick	2.20	Retrieve and distribute complaints re opening of new matters.
8/13/2003	Tracy J McCollom	0.20	Follow up on precedent document request.
8/13/2003	Jordan G Galassie	1.40	Obtain multiple pleadings re exclusivity period (1.2); distribute to requesting parties (.2).
8/13/2003	Catherine A Aebischer	1.00	Collect and organize credit documentation for document production.
8/13/2003	Damary Medina	4.00	Review files and pull mortgages, print mortgages legal key images per S. Liang.
8/14/2003	Glen G Mastroberte	1.60	Revise Deutsue Telekom participation rights agreement (1.2); conference with J. Van de North re same (.4).
8/14/2003	Seth B Kutnick	0.90	Retrieve and distribute initial disclosure re Citicorp and Citycapital.
8/14/2003	Tracy J McCollom	0.30	Retrieve and distribute precedent per M. Kleiman's request.
8/14/2003	Maria T DelZoppo	0.50	Fax Exide contact lists to C. Irmis.
8/15/2003	Jason D Horwitz	3.60	Telephone conference with K. Braden re potential payment of a prepetition claim (.3); office cofnerence re same (.2); research and analysis of same (1.0); telephone conferences with M. Satterwhite re settlement agreement re Ohio PUCO claims (.3); exchange multiple e-mail messages with M. Satterwhite, B. Ferris and D. Bloome re same (.5); office conferences re same (.2); revise settlement agreement re same (.9); office conference re OCP issues (.2).
8/15/2003	Catherine A Aebischer	6.50	Review legal key for credit documentation that may be responsive to document requests (3.1); review documents collected from off-site storage for information responsive to document requests (3.4).
8/18/2003	Charlotte L Westhoff	0.60	Review docket and update docket images.

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/18/2003	Matthew N Kleiman	3.10	Revise St. Paul stipulation re negotiation with counsel to agent (.6); prepare for omnibus hearing (2.5).
8/19/2003	Jason D Horwitz	0.20	Telephone conference with K. Braden re potential payment of a prepetition claim.
8/19/2003	Seth B Kutnick	1.90	Retrieve and distribute motion and order to modify OCP levels (1.2); retrieve and distribute transitions services agreement (.7).
8/20/2003	Jason D Horwitz	0.20	Review and analysis of final agreement resolving Ohio PUCO claims.
8/20/2003	Catherine A Aebischer	4.50	Review credit documentation for documents responsive to document requests.
8/21/2003	Jason D Horwitz	0.20	Telephone conferences with H. Pritchard re Income Protection Plan.
8/22/2003	Jason D Horwitz	0.70	Exchange e-mail messages with M. Satterwhite re settlement agreement for Ohio PUCO claims (.3); review and analysis of OCP orders re payment issue (.4).
8/22/2003	Jordan G Galassie	1.10	Prepare notice of appearance.
8/22/2003	Jordan G Galassie	2.80	File notice of appearance with bankruptcy court (1.2); retrieve service list and arrange for service via FedEx (1.6).
8/22/2003	Robert B Rittenhouse	1.50	Assemble binder of board meeting transcripts (.8); create index of all transcripts included in binder (.7).
8/22/2003	Catherine A Aebischer	0.50	Review credit documentation for documents responsive to document requests.
8/25/2003	Jason D Horwitz	0.40	Telephone conference with W. Weekley re payment of prepetition legal fees to officers (.2); e-mail messages from W. Weekley re same (.2).
8/25/2003	Claude W Irmis	1.30	Assemble and organize Exide correspondence and pleadings (.3); coordinate update of pleadings file (.2); retrieve and distribute filed disclosure statement, plan and related blacklines (.5); coordinate retrieval and distribution of Gould Electronics proof of claim materials (.3).
8/25/2003	Jordan G Galassie	2.80	Retrieve multiple SEC reports.
8/26/2003	Charlotte L Westhoff	0.40	Review docket and update image.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/27/2003	Jason D Horwitz	2.60	Telephone conferences with J. Slatkin re BMC adequate protection agreement (.4); office conference re same (.2); research and analysis re potential payment of prepetition claim (1.4); office conference re same (.2); telephone conferences with K. Braden re same (.3); correspond with D. Bloome re Ohio PUCO settlement (.1).
8/27/2003	Seth B Kutnick	0.90	Prepare Exide customer rebate report for July and coordinate filing with local counsel.
8/28/2003	Jason D Horwitz	0.90	Telephone conference with D. Bloome re Ohio PUCO settlement agreement (.2); correspond with M. Satterwhite re same (.1); office conferences re precedent for plan solicitation letters (.4); exchange e-mail messages with B. Hatcher re ESB settlement notice (.2).
8/28/2003	Seth B Kutnick	2.70	Retrieve and distribute Exide Ann Arbor tape transcription binder.
8/28/2003	Charlotte L Westhoff	1.50	Review docket and update docket images (.6); retrieve, organize and prepare proofs of claim to be sent to various creditors (.9).
8/28/2003	Yosef J Riemer	0.80	Office conference re overview of issues in Exide case.
8/29/2003	Claude W Irmis	0.40	Assemble and organize Exide correspondence and pleadings for file update.
	Total hours:	99.70	
8/1/2003	Stephanie S Liang	1.60	Conduct telephone conference with G. Kaufman re Centra Poland share transfer (.3); correspond with B. Kaplon re Centra Poland share transfer (.2); correspond with M. Touma and C. Spraggs re Centra Poland share transfer (.4); conduct telephone conference with G. Hanrehan re Assignments of Government Contracts (.3); correspond with P. Fischer re Assignments of Government Contracts (.4).
8/5/2003	Abrielle Rosenthal	0.10	Correspondence with M. Israel re Greek local counsel on DIP financing.

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/5/2003	Stephanie S Liang	3.60	Conduct telephone conference with G. Kaufman and Spanish counsel re Centra Poland share transfer (.8); correspond with Polish counsel re Centra Poland share transfer (.5); conduct telephone conference with C. Spraggs re Centra Poland share transfer (.5); conduct telephone conference with R. Brett re Assignments of Government Contracts (.5); conduct telephone conference with P. Fischer re Assignments of Government Contracts (.5); conduct telephone conference with M. Israel re Exide issues (.8).
8/6/2003	Stephanie S Liang	2.60	Conduct telephone conference with A. Cosentino re Assignments of Government Contracts (.3); conduct telephone conference with A. Cosentino and P. Fischer re Assignments of Government Contracts (.5); correspond with G. Hanrehan and R. Murdock re Assignments of Government Contracts (.4); correspond with Polish counsel re Centra Poland share transfer (.4); correspond with C. Spraggs re Centra Poland share transfer (.3); review loan documents in connection with Asset Sales (.3); conduct telephone conference with M. Israel re Asset Sales (.4).
8/7/2003	Stephanie S Liang	1.40	Review loan documents in connection with surety bonds and letters of credit (.4); conduct telephone conference with K. Braden re surety bonds and letters of credit (.5); conduct telephone conference with P. Fischer re surety bonds (.5).
8/8/2003	Stephanie S Liang	1.20	Conduct telephone conference with K. Braden re DIP Credit Agreement (.5); conduct telephone conference with C. Spraggs re Centra Poland share transfer (.3); correspond with A. Kaufman re Exide issues (.4).
8/11/2003	Stephanie S Liang	3.50	Office conference re document review (1.0); conduct telephone conference with K. Braden re document review (.3); correspond with G. Hanrehan and R. Murdock re Assignments of Government Contracts (.4); correspond with G. Kaufman re Centra Poland share transfer (.3); conduct telephone conference with M. Israel re Exide issues (.4); review loan documents in connection with formation of subsidiaries (.3); correspond with J. Desai re formation of subsidiaries (.3); correspond with C. Irmis and B. Bates re document review (.5).

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/11/2003	Andrew M Kaufman, P.C.	0.30	Office conference re cash collateral proposals in lieu of letters of credit.
8/12/2003	Stephanie S Liang	22.00	Review and analyze bankruptcy document request.
8/12/2003	Andrew M Kaufman, P.C.	1.00	Telephone conference with K. Braden and S. Liang re cash collateral for environmental permits (.4); conference with G. Kaufman re whether pre-consummation transfers would require lender consent (.3); telephone conference with G. Kaufman re whether pre-consummation transfers would require lender consent (.3).
8/13/2003	Stephanie S Liang	14.00	Review and analyze bankruptcy document request.
8/14/2003	Stephanie S Liang	0.80	Correspond with G. Kaufman re Centra Poland share transfer (.2); correspond with M. Israel re Assignments of Government Contracts (.3); correspond with A. Kaufman re Exide issues (.3).
8/17/2003	Stephanie S Liang	0.80	Draft Letter of Notice and Officer's Certificate re Exide Canada Asset Sale.
8/18/2003	Stephanie S Liang	3.50	Conduct activities in connection with the Centra Poland share transfer (.5); conduct activities in connection with the Assignments of Government Contracts (1.5); conduct activities in connection with the Exide Canada Asset Sale (1.5).
8/18/2003	Andrew M Kaufman, P.C.	0.90	DIP: Conference and analysis re pledge of government receivables and inability to obtain government signatures (.5); conference with S. Liang re application of proceeds from Maple, Ontario plant (.4).
8/19/2003	Stephanie S Liang	2.50	Conduct telephone conference with M. Israel and S. Willard re Exide Canada Asset Sale (.5); conduct telephone conference with M. Israel re Exide issues (.5); conduct telephone conference with C. Spraggs re Exide Canada Asset Sale and Centra Poland share transfer (.5); office conference re same (1.0).
8/19/2003	Andrew M Kaufman, P.C.	0.80	DIP: Telephone conferences with M. Israel re application of Maple, Ontario plant sale (.5); telephone conference with J. Hewitt re same (.3).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/20/2003	Stephanie S Liang	4.10	Conduct telephone conference with M. Israel re Exide Canada Asset Sale (.3); conduct telephone conference with J. Hewitt re Exide Canada Asset Sale (.3); participate in telephone conference re Exit Facility (1.3); draft Officer's Certificate re Exide Canada Asset Sale (1.0); conduct telephone conference with P. Fischer re Exide issues (.3); conduct telephone conference with C. Spraggs re Exide Canada Asset Sale (.3); correspond with S. Willard re Exide Canada Asset Sale (.4); correspond with G. Hanrehan and R. Murdock re Assignments of Government Contracts (.2).
8/21/2003	Andrew M Kaufman, P.C.	0.60	Office conference re ongoing issues re transfer of Central Poland shares (.3); conference with K. Braden re expiration of smelter sale waiver letter.
8/25/2003	Andrew M Kaufman, P.C.	0.80	Telephone conference with M. Israel and K. Braden re government contract issues.
8/26/2003	Stephanie S Liang	7.00	Conduct activities in connection with the Exide Canada Asset Sale (2.5); conduct activities in connection with the Assignments of Government Contracts (2.5); office conference re exit financing issues (2.0).
8/26/2003	Andrew M Kaufman, P.C.	1.00	Office conference re Central Poland share transfer (.3); office conference re pledge of governmental receivables (.4); office conference re sale of Canadian assets (.3).
8/27/2003	Stephanie S Liang	9.00	Review Exide Canada Asset Sale (2.5); conduct activities in connection with the Assignments of Government Contracts (3.0); conduct activities in connection with the Exit Facility (1.5); review Centra Poland share transfer (2.0).
8/29/2003	Stephanie S Liang	3.00	Conduct telephone conference with K. Braden re Exit Facility (.5); correspond with A. Kaufman re Exit Facility (.5); conduct activities in connection with the Assignments of Government Contracts (1.0); review and draft comments to the Commitment Letter and Term Sheet (1.0).
Total hours:		86.10	



# MATTER 82

**Matter 82 – Claims Estimate, Objection & Resolution – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/1/2003	Jason D Horwitz	0.80	Telephone conference with R. Debitteto re GI Plastek secured claim (.3); review and analysis of same (.4); correspond with C. Gring re same (.1).
8/5/2003	Jason D Horwitz	0.30	Analysis of GI Plastek's secured claim.
8/5/2003	Erik W Chalut	0.80	Draft detailed e-mail to be sent to S. Kupinsky re latest Woodlake offer (.6); correspond with B. Schwartz re same (.2).
8/5/2003	Matthew N Kleiman	0.50	Review status re Woodlake settlement negotiations.
8/6/2003	Matthew N Kleiman	0.20	Review and revise correspondence to S. Kupinsky re Woodlake settlement proposal.
8/7/2003	Jason D Horwitz	0.10	E-mail message to T. Williams re contaminant-related claim bar date.
8/8/2003	Jason D Horwitz	0.20	Telephone conference with C. Gring re GI Plastek's secured claim.
8/11/2003	Jason D Horwitz	0.50	Exchange e-mail messages with R. Debitetto re secured claim of GI Plastek (.2); telephone conferences with C. Gring re same (.2); e-mail message from C. Gring re same (.1).
8/14/2003	Erik W Chalut	0.30	Conferences with Woodlake counsel re continuing hearing on motion.
8/15/2003	Jason D Horwitz	0.20	Exchange e-mail messages with R. Debitetto re GI Plastek's secured claim.
8/27/2003	Jason D Horwitz	0.70	Research and analysis of Ohio statutory law for liens on molds re GI Plastek's secured claim (.5); office conference re same (.1); correspond with J. Stewart re same (.1).
8/28/2003	Jason D Horwitz	0.40	Telephone conference with J. Stewart re GI Plastek's secured claim (.2); exchange e-mail messages with R. Debitteto re same (.2).
Total hours:		5.00	

# MATTER 83

**Matter 83 – Corporate/Shareholder’s Inquiries – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/1/2003	Carter W Emerson, P.C.	1.30	Review 10-Q draft (.7); review Sarbanes status chart and give comments to B. Kalter (.6).
8/4/2003	Carter W Emerson, P.C.	1.60	Weekly status call with clients, Blackstone and K&E team (1.0); review 10-Q and M. Kleiman comments (.2); call with B. Kalter re same (.1); call and voicemail with M. Kleiman and S. Kupinsky re Board transition (.3).
8/4/2003	Matthew N Kleiman	1.10	Review and revise draft Form 10-Q.
8/5/2003	Jason P Desai	5.40	Review Exide 10-Q and certification attached thereto (1.0); conduct research re new Item 4 disclosure requirements (2.9); revise Item 4 disclosure in 10-Q (1.3); draft e-mail to C. Emerson re the same (.2).
8/5/2003	Carter W Emerson, P.C.	1.30	Office conferences re new 10-Q item 4 and certifications and review latest 10-Q (.7); call J. Miller re Board transition issues (.2); office conference re corporate tax issues (.4).
8/5/2003	Matthew N Kleiman	1.50	Review and revise draft 10Q.
8/6/2003	Carter W Emerson, P.C.	0.50	Review 10-Q draft and call with B. Kalter re same (.3); call with and e-mail to S. Kupinsky re status of SOX (.2).
8/6/2003	Matthew N Kleiman	2.20	Review and revise plan summary for board materials (1.5); review and revise board minutes (.7).
8/7/2003	Carter W Emerson, P.C.	1.00	E-mail and calls with M. Kleiman re settlement offer of equity committee (.3); review draft board materials and discuss board presentations with S. Kupinsky and J. Miller (.7).
8/8/2003	Seth B Kutnick	0.90	Retrieve and distribute motion for authority to pay pre-petition legal fees to Directors and Officers.
8/8/2003	Carter W Emerson, P.C.	0.60	Office conference re plan summary (.2); office conference re Yuasa license (.2); call with S. Kupinsky re closing checklist (.2).
8/11/2003	Carter W Emerson, P.C.	3.50	Telephone conference re tax structure with S. Kupin, G. McPherson (2.5); review 10-Q draft and email to B. Kalter re same (.2); weekly status call with S. Kupinsky and others (.4); calls with R. Ellis and others re document production of bank documents (.4).

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/12/2003	Carter W Emerson, P.C.	1.20	Prepare for Board of Directors meeting transition matters (.7); call with S. Kupinsky and B. Kalter re Sarbanes chart (.5).
8/12/2003	Matthew N Kleiman	1.50	Review materials re board meeting.
8/13/2003	Carter W Emerson, P.C.	7.40	Travel to Board of Directors meeting (1/2 time charged) (1.0); review Board of Directors materials and discuss with S. Kupinsky (1.0); meet and telephone call with W. Welke, G. McPherson and others re exit tax structure and draft and distribute summary (1.0); analyze draft comments re same (1.0); attend board committee meetings (1.5); discuss disclosure issue with S. Kupinsky (.2); discuss exit facility with C. Donahue (1.0); office conference re document production (.7).
8/13/2003	Matthew N Kleiman	10.50	Prepare for and participate in board and committee meetings.
8/14/2003	Carter W Emerson, P.C.	3.00	Attend Board meeting.
8/14/2003	Matthew N Kleiman	9.60	Prepare for and participate in board meeting.
8/18/2003	Carter W Emerson, P.C.	1.50	Weekly status call with clients (.7); office conferences re tax aspects of plan (.5); telephone calls with G. McPherson re nature of conversion for DM note analysis (.2); review letter from JCI re Smelters (.1).
Total hours:		55.60	

# MATTER 84

**Matter 84 – Creditors/Shareholder’s Inquiries – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/1/2003	Seth B Kutnick	2.50	Return various creditor inquiries re proof of claims.
8/1/2003	Jordan G Galassie	2.40	Return multiple creditor inquiries re proofs of claim.
8/4/2003	Adam J Gorman	1.90	Contact creditors re questions about case.
8/4/2003	Seth B Kutnick	1.20	Return various creditor inquiries re proof of claims.
8/4/2003	Jordan G Galassie	1.40	Return multiple creditor inquiries re proofs of claim.
8/4/2003	Matthew N Kleiman	0.80	Attention to status of due diligence re environmental and tort insurance.
8/5/2003	Adam J Gorman	1.40	Telephone conferences re creditor inquiries.
8/5/2003	Seth B Kutnick	0.80	Return various creditor inquiries re proof of claims.
8/5/2003	Jordan G Galassie	1.40	Return multiple creditor inquiries re contaminant bar date claims.
8/6/2003	Seth B Kutnick	1.20	Return various creditor inquiries re proof of claims.
8/6/2003	Jordan G Galassie	1.20	Return multiple creditor inquiries re contaminant related claims.
8/7/2003	Adam J Gorman	3.20	Return multiple creditor inquiries re chapter 11 status.
8/7/2003	Ross M Kwasteniet	1.20	Respond to many and varied creditor inquiries re plan of reorganization.
8/7/2003	Claude W Irmis	0.70	Respond to creditors re claims payment, general case information, plan confirmation hearing and disclosure statement issues.
8/7/2003	Jordan G Galassie	2.50	Return multiple creditor inquiries re contaminant related claims and bar dates.
8/7/2003	Matthew N Kleiman	2.30	Attention to creditor document request re environmental affairs report (1.1); review discovery requests in committee versus prepetition lender adversary proceeding (1.2).
8/8/2003	Ross M Kwasteniet	0.90	Respond to many and varied creditor inquiries re plan of reorganization.
8/8/2003	Claude W Irmis	0.60	Respond to creditors re claims and disclosure statement.
8/8/2003	Seth B Kutnick	1.40	Return various creditor inquiries re proof of claims.
8/8/2003	Jordan G Galassie	1.40	Return multiple creditor inquiries re contaminant related claims.
8/8/2003	Matthew N Kleiman	1.40	Prepare for and participate in telephone conference with client re status re discovery responses to creditors committee.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/11/2003	Adam J Gorman	3.00	Return multiple creditor inquiries.
8/11/2003	Benjamin W Bates	0.80	Office conference re assistance with document review in Princeton, New Jersey (.4); obtain copies of document requests and other necessary documents and correspond with S. Liang re background of case (.4).
8/11/2003	Claude W Irmis	1.40	Attend meeting re R2 document production request (.3); review R2 document request and plan strategy re Exide file room review (1.1).
8/11/2003	Seth B Kutnick	1.50	Return various creditor inquiries re proof of claims.
8/11/2003	Charlotte L Westhoff	2.80	Prepare for R2 document request.
8/11/2003	Kenneth Robling	0.50	Office conference re R2 document review.
8/11/2003	Jordan G Galassie	1.10	Return multiple creditor inquiries re contaminant related claims.
8/11/2003	Robert B Rittenhouse	1.50	Review information and prepared materials for trip to Exide Technologies.
8/12/2003	Benjamin W Bates	7.50	Review document requests (3.5); review pulled documents for responsiveness and privilege and organize accordingly (3.5); office conference re same (.5).
8/12/2003	Claude W Irmis	8.50	Coordinate assembly and organization of Exide diligence materials re R2 first and second document production requests.
8/12/2003	Seth B Kutnick	1.20	Return various creditor inquiries re proof of claims.
8/12/2003	Charlotte L Westhoff	8.00	Retrieve and organize due diligence materials in data room related to R2 document request #1 and #2.
8/12/2003	Wenette Bradford	8.00	Search and retrieve due diligence materials from data room related to R2 document request numbers one and two (4.0); organize and assemble same (4.0).
8/12/2003	Michal Moskovich	8.00	Assemble and organize due diligence materials in Central Files room re R2 document requests numbers one and two.
8/12/2003	Jordan G Galassie	3.80	Return multiple creditor inquiries re contaminant related claims.
8/12/2003	Robert B Rittenhouse	7.00	Retrieve and organize due diligence materials in Central Files room re R2 document requests numbers one and two.



<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/13/2003	Benjamin W Bates	16.00	Office conference re procedures and criteria for pulling and reviewing documents (1.5); review pulled documents for responsiveness and privilege and organize accordingly (11.5); review complaint and document requests (3.0).
8/13/2003	Claude W Irmis	14.20	Coordinate review and organization of Exide data room and central file diligence materials re R2 first and second document production requests.
8/13/2003	Seth B Kutnick	0.90	Return various creditor inquiries re proof of claims.
8/13/2003	Charlotte L Westhoff	12.30	Assemble and organize due diligence materials in data room related to R2 document request #1 and #2.
8/13/2003	Wenette Bradford	5.00	Organize and assemble due diligence materials from data room for R2 document request.
8/13/2003	Wenette Bradford	7.30	Search and retrieve documents from data room in relation to R2 document requests.
8/13/2003	Michal Moskovich	12.40	Assemble and organize due diligence materials in Central Files room re R2 document requests numbers one and two.
8/13/2003	Jordan G Galassie	2.50	Return multiple creditor inquiries re contaminant related claims.
8/13/2003	Robert B Rittenhouse	12.30	Assemble and organize due diligence materials in Central Files room re R2 document requests numbers one and two.
8/14/2003	Benjamin W Bates	12.50	Conference with team re process and criteria for pulling documents (1.0); review pulled documents for responsiveness and privilege (8.5); speak with company employees re responsiveness and privilege issues (2.0); attend conference call with K&E team, certain company employees (1.0).
8/14/2003	Claude W Irmis	12.60	Coordinate review and organization of Exide central file diligence materials re R2 first and second document production requests.
8/14/2003	Charlotte L Westhoff	12.00	Assemble and organize due diligence materials in central file room related to R2 document request #1 and #2.
8/14/2003	Courtney Jones	9.50	Review of Exide diligence materials for relevance and privilege re R2 document production request.
8/14/2003	Kenneth Robling	12.10	Review documents re R2 production request.
8/14/2003	Wenette Bradford	4.80	Search and retrieve due diligence materials from central file room.

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/14/2003	Wenette Bradford	7.30	Search and retrieve due diligence materials from central file room for R2 document requests (3.3); edit and update document request log (2.7); organize and assemble due diligence materials for production (1.3).
8/14/2003	Michal Moskovich	12.00	Assemble and organize due diligence materials in Data room re R2 document requests numbers one and two.
8/14/2003	Robert B Rittenhouse	12.00	Assemble and organize due diligence materials in Data room re R2 document requests numbers one and two.
8/15/2003	Benjamin W Bates	4.00	Review pulled documents for privilege and responsiveness and organize accordingly (3.1); meet with K&E team to ensure that all tasks are in order (.9).
8/15/2003	Claude W Irmis	6.90	Coordinate review and organization of Exide central file diligence materials re R2 first and second document production requests.
8/15/2003	Charlotte L Westhoff	6.20	Assemble and organize due diligence materials in central file room related to R2 document request #1 and #2.
8/15/2003	Courtney Jones	4.70	Review of Exide diligence material for relevance and privilege re R2 document production request.
8/15/2003	Kenneth Robling	4.00	Review documents re R2 production request.
8/15/2003	Wenette Bradford	6.30	Organize and assemble due diligence materials from central file room for R2 document requests (1.5); categorize and file privilege materials re same (3.8); conduct final quality control of produced materials for distribution to opposing counsel (1.0).
8/15/2003	Michal Moskovich	6.30	Assemble and organize due diligence materials in Data room re R2 document requests numbers one and two.
8/15/2003	Robert B Rittenhouse	6.30	Assemble and organize due diligence materials in Data room re R2 document requests numbers one and two.
8/16/2003	Benjamin W Bates	0.50	Review and respond to correspondence re discovery.
8/18/2003	Adam J Gorman	0.70	Assemble and coordinate distribution of diligence materials.
8/18/2003	Ross M Kwasteniet	0.40	Respond to various creditor inquiries re plan of reorganization.

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/18/2003	Claude W Irmis	0.60	Respond to estate creditors re claims procedures, disclosure statement and plan approval and general case status.
8/18/2003	Claude W Irmis	1.30	Coordinate and organization of R2 document production materials (.6); coordinate reproduction and redistribution of privilege materials to Princeton office (.7).
8/18/2003	Jordan G Galassie	1.10	Return multiple creditor inquiries re contaminant related claims.
8/19/2003	Claude W Irmis	0.60	Coordinate changes to R2 document production summary chart.
8/20/2003	Claude W Irmis	0.40	Respond to estate creditors re disclosure statement hearing, claims, confirmation hearing and case status.
8/20/2003	Michal Moskovich	3.80	Prepare for and attend office conference re edits to list of documents produced in response to R2 requests (.6); review list of documents produced in response to R2 requests (.8); sort list entries and edit according to attorney request (2.4).
8/20/2003	Jordan G Galassie	1.80	Respond to multiple creditor inquiries.
8/20/2003	Robert B Rittenhouse	2.50	Review documents and assemble for distribution.
8/21/2003	Benjamin W Bates	1.70	Review e-mails of T. O'Neil for privilege and responsiveness.
8/21/2003	Benjamin W Bates	1.80	Review emails of T. O'Neil for responsiveness and privilege.
8/21/2003	Claude W Irmis	0.70	Respond to estate creditors re claims process, disclosure statement and confirmation hearing.
8/21/2003	Claude W Irmis	2.30	Coordinate changes to document production summary chart re R2 request (.8); review, assemble and organize diligence materials re same (.6); coordinate reproduction and redistribution of privilege materials to Princeton office (.9).
8/21/2003	Jordan G Galassie	1.10	Return multiple creditor inquiries re contaminant related claims.
8/22/2003	Jordan G Galassie	2.40	Return multiple creditor inquiries re contaminant related claims.
8/24/2003	Benjamin W Bates	1.30	Review e-mails of T. O'Neil for responsiveness and privilege.
8/25/2003	Ross M Kwasteniet	1.30	Respond to many and varied creditor inquiries re plan of reorganization.

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/25/2003	Jordan G Galassie	0.60	Respond to multiple creditor inquiries.
8/26/2003	Claude W Irmis	0.60	Respond to creditors re plan confirmation and claims payment.
8/26/2003	Jordan G Galassie	1.90	Return multiple creditor inquiries re contaminant related claims.
8/27/2003	Claude W Irmis	0.50	Respond to estate creditors re plan of reorganization and claims.
8/27/2003	Jordan G Galassie	1.10	Return multiple creditor inquiries re contaminant related claims.
8/28/2003	Claude W Irmis	0.50	Respond to creditors re claims and plan objections.
8/29/2003	Claude W Irmis	1.30	Coordinate assembly and organization of materials re R2 document production request email review.
8/29/2003	Jordan G Galassie	1.10	Return multiple creditor inquiries re contaminant related claims.
8/29/2003	Charlotte Banks	7.50	Review company emails re R2 document production request.
8/29/2003	Michael Merchant	9.00	Review company emails re R2 document production request.
	Total hours:	369.20	

# **MATTER 85**

**Matter 85 – Disclosure/Plan/Confirmation – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/1/2003	Jason P Desai	0.30	Discuss current status of Disclosure Statement and Plan with Kirkland lawyers.
8/1/2003	Seth B Kutnick	1.60	Retrieve and distribute plan and disclosure statement.
8/4/2003	Jason P Desai	0.80	Revise Disclosure Statement (.6); discuss open issues with Kirkland attorneys (.2).
8/4/2003	Jason D Horwitz	3.10	Office conferences re Committee's motion to terminate exclusivity (.7); review and analysis of same (.5); begin research and analysis of case law re same (1.9).
8/4/2003	Matthew N Kleiman	0.80	Negotiation re revisions to plan re comments for equipment lessor.
8/5/2003	Jason D Horwitz	13.60	Research and analysis of case law re terminating exclusivity re Committee' motion re same (5.3); begin drafting objection to Committee's motion to terminate exclusivity (7.1); office conferences re same (1.2).
8/5/2003	Seth B Kutnick	0.90	Retrieve and distribute plan and disclosure statement.
8/5/2003	Matthew N Kleiman	0.50	Telephone conferences client re PBGC proposal for disclosure statement revisions.
8/6/2003	Jason P Desai	1.10	Discuss revisions to Disclosure Statement with Kirkland attorneys (.2); revise Disclosure Statement (.9).
8/6/2003	Jason D Horwitz	10.40	Continue drafting and revising objection to Committee's motion to terminate exclusivity (9.3); office conferences re same (1.1).
8/7/2003	Jason D Horwitz	5.60	Continued revisions to objection to Committee's motion to terminate exclusivity (4.9); office conferences re same (.5); correspond with L. Donahue (.1) and C. Powell (.1) re same.
8/7/2003	Matthew N Kleiman	0.50	Negotiation re resolution of PBGC disclosure statement objection.
8/8/2003	Ross M Kwasteniet	0.80	Draft correspondence to PBGC re proposed inserts for disclosure statement.
8/8/2003	Jason D Horwitz	8.10	Revise objection to Committee's motion to terminate exclusivity (7.1); office conferences re same (.6); e-mail message to counsel to the banks re same (.2); telephone conference with R. Hagen via voicemail re disclosure statement (.2).
8/8/2003	Claude W Irmis	0.70	Search and retrieve disclosure statement and plan confirmation precedent.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/11/2003	Todd W Haigh	4.80	Telephone conference with S. Kupinsky, C. Emerson and M. Kleiman re consummation checklist and tax restructuring (1.4); telephone conference with working group re tax restructuring (1.2); attend to matters re consummation checklist (2.2).
8/11/2003	Jason D Horwitz	8.50	Revise objection to Committee's motion to terminate exclusivity (4.3); review and analysis of DIP Agreement and Standstill Agreement re same (.9); office conferences re same (.4); telephone conference with P. Hessler re same (.1); e-mail message to P. Hessler re same (.1); e-mail message to J. O'Neill re same (.1); telephone conferences with K. Braden (.2) and S. Hirsch (.2) re documents produced to the Committee and R2 relating to their litigation re same; review and analysis of schedule of documents produced re same (.5); office conference re GECC's objections to Plan and Disclosure Statement (.3); letter to R. Hagen re same (1.4).
8/11/2003	Seth B Kutnick	1.80	Retrieve and distribute disclosure statement.
8/11/2003	Matthew N Kleiman	0.80	Attention to development of closing checklist for confirmation and effective date documents and tasks.
8/12/2003	Todd W Haigh	8.00	Review precedent plans and disclosure statements re reorganization (5.4); work on revised plan and disclosure statement (2.6).
8/12/2003	Jason P Desai	3.60	Revise Disclosure Statement and Plan of Reorganization.
8/12/2003	Jason D Horwitz	6.80	Revise letter to R. Hagen re comments to Plan and Disclosure Statement (1.0); telephone conferences with L. Donahue (.5), S. Kupinsky (.4) and J. Hewitt (.1) re comments to objection to Committee's motion to terminate exclusivity; office conferences re same (.6); revise objection to Committee's motion to terminate exclusivity (2.6); exchange multiple e-mail messages with J. O'Neill, K. DePhillips and K. Yee re same (.6); review and analysis of Bank's objection to Committee's motion to terminate exclusivity (.5); office conference re same (.2); e-mail messages to C. Muhlhauser and others re Committee's motion to terminate exclusivity and the Debtors' and the Bank's objections thereto (.3).
8/12/2003	Matthew N Kleiman	2.10	Review and revise disclosure statement, plan and exhibits.

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/13/2003	Todd W Haigh	14.80	Review background materials re tax restructuring (1.0); telephone conferences with working group re tax restructuring (1.0); work on amended plan and disclosure statement (12.8).
8/13/2003	Jason P Desai	12.30	Revise Disclosure Statement, Plan of Reorganization and exhibits thereto (10.3); office conferences re same (2.0).
8/13/2003	Jason D Horwitz	0.70	Telephone conferences with various creditors and creditors' counsel re Plan and Disclosure Statement inquiries.
8/14/2003	Jason P Desai	6.30	Revise Disclosure Statement and Plan (4.7); participate in multiple conference calls with client and Kirkland lawyers (1.4); correspond with Shearman re same (.2).
8/14/2003	Jason D Horwitz	7.70	Draft discovery requests to Committee re Committee's motion to terminate exclusivity (2.1); letter to F. Hodara re same (.2); office conferences re same (.5); prepare direct testimony outlines in preparation of hearing on Committee's motion to terminate exclusivity (4.3); office conference re same (.2); office conferences re requests for the Disclosure Statement (.4).
8/14/2003	Matthew N Kleiman	2.50	Review and revise plan and disclosure statement (1.3); review and revise discovery to creditors committee re motion to stay plan process (1.2).
8/15/2003	Jason P Desai	2.80	Place multiple telephone calls to Shearman re distribution of revised documents (.6); discuss open issues with Kirkland lawyers (.5); revise Disclosure Statement (.4); begin to draft closing checklist (.8); distribute documents to Shearman (.5).
8/15/2003	Jason D Horwitz	1.20	Office conferences re soliciting acceptances to a plan of reorganization (.4); office conferences re the Debtors' representations as to timing for emerging from bankruptcy (.8).
8/15/2003	Catherine B Filippini	4.00	Review press releases and financial documents re Exide statements re emerging from chapter 11.
8/15/2003	Erik W Chalut	1.70	Review case law re filing litigation post-petition in light of Section 108 of the Bankruptcy Code (1.3); office conference re same (.4).
8/15/2003	Seth B Kutnick	1.30	Search for disclosure statement letter precedent from CEO's or CFO's.



<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/15/2003	Matthew N Kleiman	5.30	Conduct telephone conference with counsel to City of Portland re disclosure statement objection (.4); draft correspondence re same (.3); negotiation re resolution of PBGC objection (.5); negotiation re resolution of S. Paul disclosure statement objection (1.2); draft and revise form of recommendation letter (1.1); review correspondence re potential objections of Office of U.S. Trustee re plan and disclosure statement (1.3); draft and revise timeline re disclosure statement and confirmation events (.5).
8/18/2003	Todd W Haigh	4.60	Review revised drafts of plan and disclosure statement (2.3); attend to matters re closing checklist (1.2); attend to matters re revisions to plan and disclosure statement (1.1).
8/18/2003	Jason P Desai	4.30	Discuss open issues with Kirkland lawyers (.7); draft e-mail to Shearman (.3); draft Exide corporate closing checklist (2.1); revise Disclosure Statement (1.2).
8/18/2003	Ross M Kwasteniet	1.90	Coordinate revisions to disclosure statement.
8/18/2003	Jason D Horwitz	1.10	Office conferences re statements by the Debtors regarding exiting bankruptcy (.4); letter to P. Cameron re proposed modifications to the plan and disclosure statement (.4); office conferences re same (.3).
8/18/2003	Catherine B Filippini	7.30	Review press releases, financial statements and weekly newsletters re Exide statements re emerging from chapter 11.
8/18/2003	Matthew N Kleiman	6.90	Review and revise plan and disclosure statement (4.8); attention to revisions responsive to comments from Office of U.S. Trustee (1.7); negotiation with PBGC re disclosure statement objection (.4).
8/19/2003	Todd W Haigh	2.50	Attend to matters re closing checklist (.7); attend to matters re revisions to plan and disclosure statement (1.8).
8/19/2003	Jason P Desai	6.10	Revise Exide corporate closing checklist (2.9); revise Disclosure Statement (1.7); discuss changes to Disclosure Statement with Kirkland attorneys (.6); discuss changes to checklist with Kirkland attorneys (.9).

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/19/2003	Jason D Horwitz	3.00	Office conferences re objections to the Disclosure Statement (.3); draft insert to same re personal injury claims procedures (.7); office conferences re modifications to First Amended Plan and Disclosure Statement (.3); telephone conference with P. Cameron re same (.2); letter from F. Hodara re responses to Debtors' discovery requests relating to Committee's motion to terminate exclusivity (.1); letter to F. Hodara re same (.5); office conference re same (.2); multiple office conferences re Debtors representations as to the timing for emerging from bankruptcy (.7).
8/19/2003	Catherine B Filippini	6.70	Review press releases, financial statements and weekly newsletters re Exide statements re emerging from chapter 11.
8/19/2003	Wenette Bradford	3.00	Review Exide documents for plan of organization materials.
8/19/2003	Michal Moskovich	4.00	Review weekly internal memos for information re plan of emergence (1.9); denote information re same (1.0); organize materials and submit for attorney review (1.1).
8/19/2003	Michael Najjarpour	6.20	Research Exide documents for specific language alluding to reorganization plan and the time frame for emergence from bankruptcy.
8/19/2003	Chad J Husnick	0.70	Review documents re confirmation and reorganization language.
8/19/2003	Brooke L Paugh	3.50	Office conference re plan of reorganization confirmation (.2); conduct research re same (3.3).
8/19/2003	Matthew N Kleiman	6.60	Review disclosure statement objections and summary and attention to responses and resolution re same (3.2); draft and revise correspondence to client re status of disclosure statement objections (.8); review and revise plan and disclosure statement (2.6).
8/20/2003	Todd W Haigh	1.50	Review and revise disclosure statement.
8/20/2003	Jason P Desai	2.60	Draft list of open items re Disclosure Statement (.8); revise Disclosure Statement (1.4); discuss open issues re Plan and Disclosure Statement with Kirkland attorneys (.4).
8/20/2003	Jason D Horwitz	0.50	Revise insert for Disclosure Statement re PI Claims Procedures (.4); office conference re same (.1).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/20/2003	Jason D Horwitz	9.20	Review and analysis of statements made by Exide re emerging from chapter 11 in preparation of hearing on Committee's motion to terminate exclusivity (4.3); office conferences re same (1.1); prepare for and participate in team meeting re objections to Disclosure Statement (.6); review and analysis of Plan and Disclosure Statement re same (.5); multiple office conferences re same (1.2); telephone conferences with M. McMahon re Transamerica's objection to Disclosure Statement (.4); revise language of Disclosure Statement re same (.3); telephone conference with S. Opincar re Gould's objection to Disclosure Statement (.2); correspond with D. Duer (.1), M. Dorval (.1), B. Wright (.1) and S. Durbin (.1) re objections to Disclosure Statement; telephone conference with J. Stiener re State of New Jersey's objection to Disclosure Statement (.2).
8/20/2003	Catherine B Filippini	6.60	Review press releases, financial statements and weekly newsletters re Exide statements re emerging from chapter 11 (1.6); copy, collate and organize documents re same (.8); review and highlight documents re Exide statements re same (1.2); organize, assemble and create binders re same (3.0).
8/20/2003	Claude W Irmis	3.20	Meeting re disclosure statement objection resolution (.5); contact disclosure statement objectors to begin resolution of assigned objections (.6); assemble and distribute materials for distribution to creditors objecting to disclosure statement (.7); assemble and prepare letters re resolution of objections to disclosure statement (1.4).
8/20/2003	Wenette Bradford	5.00	Organize, sort and assemble documents re emergence from Chapter 11 (1.2); create index re same (1.3); edit and update index to reflect additional entries (.7); conduct final quality control for distribution to opposing counsel (1.8).
8/20/2003	Tracy J McCollom	9.80	Organize documents re Exide statements re emergence from Chapter 11 (6.6); prepare binders re same (3.2).
8/20/2003	Matthew N Kleiman	1.60	Review and revise plan and disclosure statement (.8); review disclosure statement objections (.8).
8/21/2003	Todd W Haigh	5.20	Revise disclosure statement (4.0); attend to matters re revisions to plan (1.2).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/21/2003	Ross M Kwasteniet	5.00	Gather precedent for omnibus responses to disclosure statement objections (1.1); revise plan of reorganization and make corresponding changes to disclosure statement (3.9).
8/21/2003	Ross M Kwasteniet	4.10	Review objections to disclosure statement and draft proposed inserts for disclosure statement in an effort to resolve certain objections to disclosure statement.
8/21/2003	Jason D Horwitz	10.80	Review and analysis of Smith Management's Joinder to Committee's Motion to Terminate Exclusivity (.5); multiple, lengthy office conferences re objections to Disclosure Statement (2.1); review and analysis of same (3.2); telephone conferences with M. McMahon (.5); S. Durbin (.3); S. Opincar (.4); M. Doval (.3); B. Wright (.2); D. King (.2) and J. Stiener (.4) re same; e-mail messages to B. Wright (.1), P. Cameron (.1), and M. McMahon (.2) re same; revise insert to Disclosure Statement (.2); correspond with P. Cameron (.1) and D. Duer (.1) re same; telephone conference with T. Williams re claims register re same (.4); multiple meetings with BMC re same (.7); telephone conferences with J. Slatkin (.3) and K. Braden (.2) re liquidation analysis re same; telephone conference with C. Powell re offer to purchase assets re same (.3).
8/21/2003	Catherine B Filippini	1.40	Review and highlight documents re Exide's statements re emerging from Chapter 11 (.6); review, organize and assemble documents re same (.4); prepare and distribute binder re same (.4).
8/21/2003	Claude W Irmis	2.30	Continue to coordinate with estate creditors re resolution of objections to disclosure statement (1.8); retrieve and distribute disclosure statement precedent (.5).
8/22/2003	Todd W Haigh	4.00	Revise disclosure statement.
8/22/2003	Ross M Kwasteniet	8.90	Negotiations with various parties in an effort to resolve objections to disclosure statement (2.9); draft inserts in response to objections to disclosure statement (3.1); revise plan and disclosure statement (2.9).

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/22/2003	Jason D Horwitz	7.90	Multiple office conferences re objections to Disclosure Statement (2.4); multiple telephone conferences with D. Duer (.3), M. McMahon (.1), S. Opincar (.1), M. Dorval (.3), B. Wright (.3), D. King (.2), P. Cameron (.4), R. Lehr (.4) and L. Donahue (.1) re various objections to disclosure statements; correspond with S. Opincar (.1) and S. Durbin (.1) re same; exchange e-mail messages with P. Cameron (.3) and R. Lehr (.4) re same; meeting with BMC re same (.3); review and analysis of objections to Disclosure Statement re potential resolutions to same (2.1).
8/22/2003	Catherine B Filippini	0.50	Prepare for discovery re R2 requests.
8/22/2003	Claude W Irmis	2.30	Complete resolution of partial objections to Exide disclosure statement (1.2); attend teleconference re resolution of objections to disclosure statement (.5); assemble and prepare disclosure statement objection resolution summary chart (.6).
8/22/2003	James W Kapp	0.10	Review Daily Bankruptcy Review article re disclosure statement objections.
8/22/2003	Matthew N Kleiman	2.10	Review and revise amended plan and disclosure statement, exhibits, and solicitation materials (1.6); attention to status re resolution of disclosure statement objections and prepare for disclosure statement hearing (.5).
8/23/2003	Todd W Haigh	1.10	Various telephone conference with bankruptcy attorneys re disclosure statement and amended plan (.2); attend to matters re same (.9).
8/23/2003	Jason P Desai	0.60	Discuss revisions to exhibits to Disclosure Statement and Plan with Kirkland attorneys.
8/23/2003	Ross M Kwasteniet	7.10	Revise plan and disclosure statement in response to various objections to disclosure statement.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/23/2003	Jason D Horwitz	8.10	Multiple office conferences re objections to Disclosure Statement and modifications to Disclosure Statement and Shareholders Agreement (2.9); telephone conferences with R. Lehr (.1), S. Durbin (.1), M. McMahon (.1), B. Wright (.1) and P. Cameron (.1) re objections to Disclosure Statement; e-mail messages to R. Lehr (.3), M. Dorval (.4) and D. Duer (.3) re same; correspond with S. Opincar re same (.2); revise Shareholder Agreement (1.9); telephone conferences with L. Donahue re same (.4); revise Disclosure Statement and Plan (1.2).
8/23/2003	Matthew N Kleiman	7.50	Review and revise amended plan and disclosure statement, exhibits, and solicitation materials (5.1); attention to status re resolution of disclosure statement objections and prepare for disclosure statement hearing (2.4).
8/24/2003	Todd W Haigh	0.70	Various telephone conference with bankruptcy attorneys re disclosure statement and plan (.2); attend to matters re same (.5).
8/24/2003	Ross M Kwasteniet	11.30	Revise plan, disclosure statement and solicitation materials (9.2); coordinate distribution of such documents in advance of hearing on adequacy of disclosure statement (2.1).
8/24/2003	Jason D Horwitz	10.90	Office conferences re objections to Disclosure Statement and modifications to Disclosure Statement, Plan and Shareholders Agreement (4.8); research and analysis of case law re time to assume or reject executory contracts in preparation of hearing on Disclosure Statement (1.1); exchange e-mail messages with R. Lehr (.4) and M. Dorval (.1) re objections to Disclosure Statement; correspond with S. Opincar (.1) and R. Lehr (.1) re same; telephone conferences with S. Kupinsky (.3), H. Pritchard (.2) and D. Duer (.2) re same; draft chart of status of objections to Disclosure Statement (1.4); revise Disclosure Statement, Plan and Shareholders Agreement (2.2).
8/24/2003	Matthew N Kleiman	10.50	Review and revise amended plan and disclosure statement, exhibits, and solicitation materials (6.3); attention to status re resolution of disclosure statement objections and prepare for disclosure statement hearing (4.2).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/25/2003	Todd W Haigh	4.00	Office conference with C. Emerson re closing checklist (.4); attend to matters re closing checklist (.6); review revised plan and disclosure statement (3.0).
8/25/2003	Jason P Desai	3.10	Revise corporate closing checklist (2.2); discuss revisions to checklist with Kirkland attorneys (.9).
8/25/2003	Gary E Axelrod	0.50	Conference with T. Haigh re restructuring.
8/25/2003	Jason D Horwitz	2.80	E-mail message from S. Opincar (.1) and R. Lehr (.2) re objections to Disclosure Statement; exchange e-mail messages with M. Dorval re same (.2); correspond with S. Opincar re same (.1); office conferences re same (2.2).
8/25/2003	Carter W Emerson, P.C.	0.40	Office conference re status of plan drafting.
8/25/2003	Matthew N Kleiman	2.40	Numerous conferences with objecting parties re revisions to disclosure statement and plan (1.6); attention to negotiations re plan (.8).
8/26/2003	Todd W Haigh	4.30	Telephone conference with working group re closing checklist (1.5); attend to matters re revisions to plan and disclosure statement (2.8).
8/26/2003	Jason P Desai	3.80	Participate in conference call with client re closing checklist (1.5); revise corporate closing checklist (1.8); discuss open issues re Exide with Kirkland lawyers (.5).
8/26/2003	Ross M Kwasteniet	2.20	Revise plan of reorganization and disclosure statement in response to comments received at disclosure statement hearing.
8/26/2003	Ross M Kwasteniet	1.20	Revise shareholder agreement term sheet and preferred stock term sheet, as exhibits to plan of reorganization.
8/26/2003	Carter W Emerson, P.C.	2.50	Calls and voicemail with S. Kupinsky, M. Kleiman, M. Feldman, A. Kaufman, T. Haigh, L. Donahue, W. Welke, C. Spraege and R. Kwastiniet re plan revisions and steps.
8/26/2003	Matthew N Kleiman	9.60	Review and revise plan, disclosure statement and exhibits (6.5); review analysis re adequate protection claims and research re same (1.8); draft correspondence to counsel re insert and solicitation materials (.4); review and revise time line re confirmation events (.3); draft correspondence to special counsel to board of directors re revisions to release provisions (.6).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/27/2003	Todd W Haigh	4.00	Attend to matters re closing checklist (1.2); attend to matters re tax restructuring (2.8).
8/27/2003	Jason P Desai	4.90	Review timeline provided to us by client and revise corporate closing checklist accordingly (2.8); review comments on Disclosure Statement and Plan sent by creditors' committee and other parties (.8); revise checklist pursuant to internal comments and distribute to client (1.3).
8/27/2003	Ross M Kwasteniet	6.20	Revise plan and disclosure statement in response to comments received at disclosure statement hearing.
8/27/2003	Jason D Horwitz	1.70	Office conferences re modifications to the Disclosure Statement (1.3); telephone conference with R. Lehr re same (.1); e-mail message from R. Lehr re same (.2); e-mail message to M. Love re same (.1).
8/27/2003	Carter W Emerson, P.C.	1.30	Office conference re case litigation schedule (.3); review plan changes with R. Kwasteniet, T. Haigh, M. Kleiman (.5); review outlines of timelines (.2); call with E. Berg (exit lender counsel) to explain plan and send follow up e-mail (.3).
8/27/2003	Thaddine Gomez	0.30	Interoffice teleconference re organization matters for companies to be newly formed.
8/27/2003	Andrew M Kaufman, P.C.	2.00	Telephone conference with G. Kaufman, M. Israel re planning for confirmation and required restructuring steps, and follow-up analysis re same.
8/27/2003	Matthew N Kleiman	8.50	Attention to revisions to plan, disclosure statement and exhibits and review of proposed inserts from parties in interest (6.6); review revised form of solicitation procedures order (.4); attention to negotiations re plan (1.1); review closing checklist (.4).
8/27/2003	Matthew N Kleiman	0.60	Review and revise form of press release re approval of disclosure statement.
8/27/2003	James D Sonda	0.50	Analyze and discuss HSR issues with C. Emerson.
8/28/2003	Jason P Desai	0.20	Review e-mail re Disclosure Statement and Plan of Reorganization.
8/28/2003	Ross M Kwasteniet	7.90	Revise plan and disclosure statement.
8/28/2003	Jason D Horwitz	3.50	Office conferences and analysis re modifications to the Disclosure Statement (2.2); review and analysis of letter from R. Hagen re same (.3); multiple e-mail messages re same (.8); exchange e-mail messages with M. McMahon re the Disclosure Statement (.2).



<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/28/2003	Carter W Emerson, P.C.	2.00	Office conferences re stock terms (1.0); call with E. Berg and e-mail to M. Kleiman and others re comments re plan (.5); calls re proving up on intercreditor case with A. Sidrys, Y. Riemer, M. Kleiman and others (.5).
8/28/2003	Matthew N Kleiman	3.80	Attention to revisions to plan and disclosure statement and review of proposed inserts from parties in interest; (3.1); review revised form of solicitation procedures order (.7).
8/28/2003	Matthew N Kleiman	0.50	Review proposed letter from counsel to Equity Committee.
8/28/2003	Matthew N Kleiman	0.50	Review and revise press release re disclosure statement approval.
8/29/2003	Jason P Desai	0.40	Review revised drafts of Disclosure Statement, Plan and term sheets.
8/29/2003	Jason D Horwitz	8.70	Revise Disclosure Statement, Plan and exhibits (6.7); telephone conferences with M. Love re same (.3); office conferences re same (1.1); e-mail message to several parties re same (.6).
8/29/2003	Carter W Emerson, P.C.	1.30	Calls and e-mail with M. Kleiman re treatment of 2.9% notes (.3); review revised plan and disclosure statement (1.0).
8/29/2003	Matthew N Kleiman	6.60	Review and revise recommendation letter (1.4); review recommendation letter from creditors committee and conduct telephone conference with S. Kupinsky re same (1.3); review report from Bank of New York (.8); attention to revisions to plan and disclosure statement and distribution of revised versions to parties in interest (2.1); review confirmation discovery from committee (.6); draft correspondence to committee counsel re timing of discovery responses (.4).
8/31/2003	Jason P Desai	0.40	Review Shearman comments on documents distributed earlier this week.
	Total hours:	469.20	

# **MATTER 86**

**Matter 86 – Employee Issues – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/7/2003	Vicki V Hood	1.70	Review statement to PBGC re pension plans (.5); telephone conference with M. Kleiman re PBGC statement (.2); work re A. Hipp claim for supplemental payments (1.0).
8/7/2003	Matthew N Kleiman	0.70	Attention to client inquiry re status of non-qualified pension plans.
8/11/2003	Matthew N Kleiman	1.00	Review and revise form of consent decree with department of labor (.7); conduct telephone conference with H. Pritchard re same (.3).
8/12/2003	Matthew N Kleiman	0.50	Conduct telephone conference with H. Pritchard re form of consent decree with department of labor.
8/21/2003	Vicki V Hood	0.30	Review PBGC agreement re pension funding.
8/28/2003	Vicki V Hood	1.00	Client call re pension plan alternatives post emergence.
8/28/2003	Matthew N Kleiman	0.90	Prepare for and participate in conduct telephone conference with S. Kupinsky, B. Hatcher re pension alternatives.
	Total hours:	6.10	

# **MATTER 87**

**Matter 87 – Environmental Matters -DIP – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/1/2003	Mark E Grummer	2.30	Prepare email memorandum to N. Hayes concerning settlement terms for Exide at San Gabriel Valley site (1.1); exchange voice messages with N. Hayes and M. Love re same (.1); telephone conference with M. Love re Visalia site and Environmental Affairs Report and make notes re same (.3); exchange emails re insurance agreements (.1); review Environmental Affairs Report and forward same to J. Hewitt (.4); prepare email to creditors' committee re insurance information (.3).
8/4/2003	Mark E Grummer	3.40	Exchange emails re insurance information requested by creditors' committee and complete and send email report to committee (1.4); review background of Visalia site and draft letter responding to California DTSC demand re same and forward draft to team (1.9); review email re Magic Marker site (.1).
8/5/2003	Mark E Grummer	3.00	Prepare email to Exide team re Magic Marker site (.9); telephone conference with H. Pritchard re insurance issues (.2); prepare for and participate in conference call with R. Collings, M. Love, and J. Armstrong re Visalia and Magic Marker sites (1.0); K&E office conference re results of call (.1); do email message to Exide team re results of call (.1); revise draft letter re Visalia site and forward to Exide team for review (.5); check on bar date notice to parties involved at Visalia site (.1); forward Magic Marker site correspondence to R. Collings (.1).
8/6/2003	Mark E Grummer	0.20	Review draft letter to New Jersey re Magic Marker site.
8/8/2003	Mark E Grummer	0.10	Email to M. Love re Terra Sure Agreement.
8/11/2003	Mark E Grummer	0.60	Review emails re Terra Sure and telephone voice message to M. Love re same (.2); telephone conference with M. Love re Gould and Terra Sure issues (.4).
8/14/2003	Mark E Grummer	0.60	Exchange emails with team re Gould issues (.1); receive telephone call from attorney for California Attorney General's office re contaminant bar date and exchange voice messages and office conferences with K&E team re response to same (.5).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/15/2003	Mark E Grummer	0.80	Review Tennessee letter demanding increased financial assurances (.3); prepare email to M. Love and telephone conference with M. Love re same (.5).
8/18/2003	Mark E Grummer	0.20	Exchange emails re request for increased financial assurances at Refined Metals inactive facility.
8/19/2003	Mark E Grummer	0.30	Review email from N. Hayes re Puente Valley consent decree with other PRP group and review consent decree.
8/20/2003	Mark E Grummer	2.00	Review draft letter to New Jersey responding to "directive" re Magic Marker site (.1); conferences with J. Horwitz re environmental objections to Disclosure Statement (.3); review same (.3); telephone conference with J. Horwitz to S. Durbin, attorney for the State of California (.2); telephone conference with J. Horwitz to D. Duer (U.S. DOJ) (.1); draft revisions to letter to New Jersey responding to Magic Marker site "directive" (1.0).
8/20/2003	Walter H Lohmann	0.50	Office conference re owner/operator environmental liability issues re: potential financing.
8/21/2003	Mark E Grummer	5.90	Draft revisions to letter to New Jersey responding to Magic Marker site "directive" (2.2); telephone conference with J. Stiener (New Jersey) re New Jersey's objection to Disclosure statement (.5); review environmental objections to Disclosure Statement (1.3); office conference re same (.3); telephone conference with S. Opincar attorney for Gould, re Gould's objection to Disclosure Statement (.3); prepare for and participate in conference call with R. Collings and J. Armstrong re draft letter to New Jersey (.6); review further revisions to letter (.3); office conference re Disclosure Statement objections and attempt to reach counsel for objectors (.4).
8/21/2003	Walter H Lohmann	1.50	Telephone conferences with Wilkie Farr environmental lawyer re environmental liabilities associated with leasing rather than own real estate.
8/22/2003	Mark E Grummer	5.40	Work with J. Horwitz to resolve objections to Disclosure Statement in preparation for 8/25 hearing including drafting proposed changes to Disclosure Statement and negotiate with objectors re same.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/23/2003	Mark E Grummer	0.50	Telephone conferences and exchange voice messages and emails with J. Horwitz re Disclosure Statement objections and proposed changes to resolve same.
8/24/2003	Mark E Grummer	2.10	Draft email memorandum re approach to Magic Marker site negotiations with New Jersey (1.8); telephone conference with J. Horwitz and draft proposed changes to Disclosure Statement to satisfy California objections and forward same to J. Horwitz (.3).
8/25/2003	Mark E Grummer	3.00	Complete and send email memorandum to team re Magic Marker site (1.20); telephone conference with M. Love re Magic Marker site (.1); review and sign Magic Marker site tolling agreement (.2); review Louisiana DEQ motion and exchange emails and voice messages re same and other issues with team (.7); office conference re providing Environmental Affairs Report and arrange for transmission of same to Gould (.5); telephone conference with J. Armstrong re Magic Marker site status (.3).
8/26/2003	Mark E Grummer	0.30	Exchange emails re Environmental Affairs Report and transmit same to Gould.
8/27/2003	Mark E Grummer	0.20	Exchange emails re Magic Marker site.
8/29/2003	Mark E Grummer	1.10	Exchange voice messages re California DTSC changes to Disclosure Statement and review and edit same and review SOFA 17 table re listings of Superfund sites.
8/30/2003	Mark E Grummer	0.90	Review Gould proof of claim.
	Total hours:	34.90	

# **MATTER 88**



**Matter 88 – Executory Contracts/Leases – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/1/2003	Jason D Horwitz	2.20	Telephone conference with D. Malloy re PHH objection to lease rejection (.2); telephone conferences with J. Estrada re lease issues, including CIT Group motion for payment of postpetition rent and 305 Clearview objection (.3); review and analysis of e-mail message from L. Miller re 305 Clearview objection to lease rejection (.4); office conference re same (.1); e-mail message to J. Estrada re list of rejected contracts (.2); review and analysis of lease rejection issues (.5); office conference re same (.1); correspond with B. Hatcher re same (.2); telephone conferences with N. Lynn re security deposit (.2).
8/4/2003	Jason D Horwitz	1.00	Exchange e-mail messages with B. Hatcher re SAFT motion to assume or reject (.5); telephone conference with K. Perzee re same (.2); correspond with L. Babich re same (.1); exchange e-mail messages with J. Estrada re CIT group motion to pay postpetition rent (.2).
8/6/2003	Matthew N Kleiman	1.10	Review disputes re transfer of lease equipment to off-site third-parties.
8/7/2003	Jason D Horwitz	3.20	Review and analysis of 3 equipment leases re rejection of same (.8); office conference re same (.1); exchange e-mail messages with J. Estrada (.3) and T. Williams (.2) re same; correspond with J. Estrada re same (.1); review and analysis of lease for non-residential real property in San Diego in preparation of executing same (.6); office conference re same (.1); telephone conference with M. Gaw re same (.2); review and analysis of letter from A. White re non-residential real property lease in Bristol, TN (.4); office conference re same (.1); correspond with A. White re same (.1); correspond with L. Miller re Raritan Center lease (.1); e-mail message to J. Estrada re CIT Group motion to pay postpetition rent payments (.1).
8/8/2003	Jason D Horwitz	1.20	Telephone conference with J. Estrada re lease rejection issues (.2); exchange e-mail messages with B. Hatcher (.5) and M. Gaw (.2) re same; telephone conference with L. Miller re rejection of Raritan Center lease (.1); e-mail message to T. Williams re rejection of equipment lease (.2).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/8/2003	Matthew N Kleiman	0.40	Review disputes re transfer of lease equipment to off-site third-parties.
8/12/2003	Jason D Horwitz	1.30	Telephone conference with L. Miller re 305 Clearview's objection to lease rejection (.2); e-mail message to K. Yee re same (.1); telephone conference with K. Mangan re CIT Group's motion for postpetition lease payments (.2); e-mail messages to K. Mangan (.1) and J. O'Neill (.1) re same; correspond with J. Demmy re PHH's objection to lease rejection (.1); telephone conference with D. Malloy re same (.2); correspond with L. Babich re SAFT's motion to compel assumption or rejection (.1); telephone conference with A. White via voicemail re Exide Drive Investment lease (.2).
8/12/2003	Matthew N Kleiman	0.40	Review disputes re transfer of lease equipment to off-site third-parties.
8/13/2003	Jason D Horwitz	0.70	Telephone conferences with J. Estrada (.2) and F. Szela (.3) re rejection of 305 Clearview lease; telephone conference with A. White re Exide Investment lease (.2).
8/14/2003	Jason D Horwitz	0.40	Telephone conferences with J. Estrada re various lease issues.
8/15/2003	Jason D Horwitz	0.70	Telephone conference with L. Babich re SAFT's motion to assume or reject (.2); exchange e-mail messages with L. Babich re same (.2); telephone conferences with J. Demmy re PHH's objection to Debtors' lease rejection (.2); e-mail message from A. Mateen re payments to CIT Group (.1).
8/18/2003	Gary M Vogt	0.80	Examine and verify vendor invoices to approve and process for payment (.5); prepare check requests re same (.3).
8/19/2003	Gary M Vogt	0.50	Examine and verify additional vendor invoices to approve and process for payment (.3); prepare check requests re same (.2).
8/20/2003	Jason D Horwitz	0.20	Telephone conference with S. Kupinsky re rejection of executory contracts.
8/26/2003	Lauren P Hibbe	0.30	Respond to attorney document requests.
8/27/2003	Jason D Horwitz	1.30	Prepare for and participate in conference call with client re various lease issues, including rejection and moving equipment (1.1); telephone conference with J. Estrada re same (.2).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/27/2003	Matthew N Kleiman	1.10	Prepare for and participate in telephone conference with client re cross-default provisions and lease recharacterization issues.
8/28/2003	Jason D Horwitz	3.80	Telephone conferences with J. Estrada re GECC lease issues (.3); e-mail messages from J. Estrada re same (.2); review and analysis of equipment lease re rejection of same (.6); e-mail message to T. Williams re same (.1); exchange multiple e-mail messages with B. Hatcher re equipment leases (.9); office conferences re same (.2); telephone conference with B. Hatcher re equipment lease issues (.3); office conference re same (.1); telephone conferences with M. Gaw re real property lease (.3); review and analysis of same (.4); telephone conferences with D. Malloy re rejection of PHH lease (.3); e-mail message from M. Gaw re moving equipment (.1).
Total hours:		20.60	

# **MATTER 90**

**Matter 90 – Hearings – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/4/2003	Seth B Kutnick	1.20	Retrieve and distribute June 24, 2003 omnibus transcript.
8/11/2003	Seth B Kutnick	1.40	Coordinate with local counsel re retrieval of June Omnibus transcript.
8/11/2003	Matthew N Kleiman	2.00	Prepare for and participate in telephonic hearing re motion to continue stay hearing.
8/19/2003	Matthew N Kleiman	5.60	Prepare for and participate in omnibus hearing.
8/22/2003	Matthew N Kleiman	12.10	Prepare for and participate in hearings on motion to stay confirmation process and motion to use confidential document.
8/25/2003	Matthew N Kleiman	6.80	Prepare for and participate in hearing re approval of disclosure statement.
8/28/2003	Seth B Kutnick	2.40	Update Exide hearing transcript binder.
	Total hours:	31.50	

# MATTER 92

**Matter 92 – K&E Fee Application– Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
7/8/2003	Demetrio D Johnson	0.50	Organize and label interim compensation documents.
8/4/2003	Erik W Chalut	1.60	Review and revise May fee application.
8/7/2003	Erik W Chalut	3.90	Review and revise May fee application (2.5); office conferences re same (.6); coordinate filing and service of same (.6); correspond with Y. Gutzman re same (.2).
8/7/2003	Charlotte L Westhoff	0.60	Assist with fee application preparation.
8/8/2003	Toni L Wallace	3.50	Prepare exhibits to May monthly fee application.
8/8/2003	Erik W Chalut	2.80	Review and revise June fee application (2.5); office conferences re same (.3).
8/13/2003	Erik W Chalut	0.60	Review and revise June fee application.
8/14/2003	Erik W Chalut	1.00	Review and revise June fee application.
8/15/2003	Toni L Wallace	6.50	E- mail correspondence to D. Johnson re order for fourth quarterly fee application (.1); prepare June monthly fee notice (1.5); prepare exhibits to same (3.5); prepare and forward May monthly fee detail to fee auditor (.4); prepare timekeeper charts for April and May monthly fee statements and forward same to fee auditor (1.0).
8/15/2003	Erik W Chalut	2.70	Finalize June fee application (1.2); office conferences re same (.3); coordinate filing of same (.3); finalize quarterly fee application (.5); office conferences re same (.4).
8/15/2003	Demetrio D Johnson	0.50	Locate order granting fees for the fourth interim period.
8/18/2003	Toni L Wallace	0.70	Final edits to fifth quarterly fee application (.1); prepare and forward same to local counsel for service and filing (.3); prepare exhibits to same and forward to local counsel (.3).
8/25/2003	Erik W Chalut	3.20	Review and revise Exide July fee application (2.9); office conferences re same (.3).
8/27/2003	Erik W Chalut	1.20	Review and revise Exide July fee application.
8/28/2003	Toni L Wallace	3.00	Prepare July monthly fee notice and exhibits to same.
8/28/2003	Erik W Chalut	1.50	Review July fee application and revise same (1.0); office conferences re same (.5).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/29/2003	Erik W Chalut	0.70	Review and finalize Exide July fee application and coordinate filing of same (.5); telephone conference and e-mail to K. DePhillips re same (.2).
	Total hours:	34.50	



# **MATTER 97**

**Matter 97 – Retention of Professionals – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/1/2003	Erik W Chalut	0.50	Review and finalize Kleiman supplemental affidavit (.3); coordinate filing of same (.2).
8/4/2003	Erik W Chalut	0.50	Respond to query from Katten re fee application process (.2); correspondence with Exide re revised OCP list (.3)
8/6/2003	Erik W Chalut	0.40	Attend to matters re OCP process.
8/8/2003	Erik W Chalut	0.20	Respond to query from P. Abner re OCP issues.
8/11/2003	Seth B Kutnick	1.40	Retrieve and distribute Gavin Anderson retention agreement.
8/19/2003	Jason D Horwitz	0.60	Telephone conference with J. Wirth re OCP issues (.2); office conferences re same (.4).
	Total hours:	3.60	

# MATTER 99

**Matter 99 – Tax Issues – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/1/2003	Olga A Loy	2.40	Telephone conference with G. McPherson and J. O'Neil re structuring of the proposed reorganization (.8); research treatment of previously taxed income for purposes of Code Section 382 (1.0); research publications on the Bruno's structure (.6).
8/1/2003	Thomas L Evans	0.50	Office conference re Congressional bill pending re tax attributes in bankruptcy.
8/1/2003	William R Welke, P.C.	2.00	Telephone conferences with G. McPherson re NOL issues (1.0); office conference re same (.5); office conference re status of Santorum legislation (.5).
8/4/2003	Thomas L Evans	0.50	Review status of Congressional bill pending re tax attributes in bankruptcy.
8/4/2003	Michael A Carew	4.00	Conduct legal research re 382 and controlled foreign corporations.
8/4/2003	William R Welke, P.C.	6.00	Review tax consequences of structure and alternatives (4.7); telephone conference re same with G. McPherson (1.3).
8/5/2003	William R Welke, P.C.	5.00	Review valuation materials from Blackstone re impact on tax (1.5); telephone conference with J. O'Neil re numbers and impact on tax attribute planning (1.0); telephone conferences with G. McPherson re structure and tax attributes and impact of valuation (2.0); office conferences re same (.5).
8/6/2003	William R Welke, P.C.	3.30	Telephone conferences with G. McPherson and J. O'Neil re valuation and allocation issues and impact on reorganization restructure.
8/7/2003	Olga A Loy	1.20	Office conference re approaches to the Plan of Reorganization of Exide (.5); research Santorum legislation status and additional proposals on attribute reduction (.7).
8/11/2003	Olga A Loy	3.00	Prepare for and participate in office conference re structure of the acquisition (1.0); research proposed legislation on the consolidated attribute reduction (1.2); review Bruno's Disclosure Statement (.8).
8/11/2003	Thomas L Evans	1.00	Office conference re tax structures in Plan.
8/11/2003	William R Welke, P.C.	3.20	Telephone conferences with G. McPherson re reorganization structure and review same (1.6); telephone conference with S. Kupinsky, G. McPherson and others re same (1.6).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/12/2003	Olga A Loy	4.00	Prepare for and participate in the telephone conference with J. O'Neil and G. McPherson re implementation of the proposed structure in Exide reorganization (1.5); review powerpoint slides describing the structure of the transaction (.5); office conference re structure of the proposed transaction (.5); research Bruno's tax structure as described in the Disclosure Statement (1.2); research publications on the Bruno's structure (.3).
8/12/2003	Thomas L Evans	0.80	Conferences with various joint committee staffers re fate of Santorum bill re tax attributes and consolidated versus separate entity treatment.
8/12/2003	William R Welke, P.C.	5.50	Telephone conference with G. McPherson re tax structure (.8); review slides and spreadsheets re allocation issues and related tax questions (2.0); telephone conference with G. McPherson, J. O'Neil and others re tax structure (2.4); office conference re tax structure (.3).
8/13/2003	Olga A Loy	4.80	Work on the Tax Consequences section in the Disclosure Statement (1.2); telephone conference with J. O'Neil and G. McPherson re proposed structure of the acquisition (1.0); research legislative proposals re consolidated attribute reduction (1.5); review and revised Amended Plan of Reorganization (.6); office conference re acquisition structure (.5).
8/13/2003	William R Welke, P.C.	3.70	Telephone conferences with G. McPherson and J. O'Neil re reorganization structure.
8/14/2003	Olga A Loy	3.80	Research tax consequences of using Bruno's structure (1.4); office conference re acquisition structure of Exide (.5); review revised Plan of Reorganization (.7); research previously taxed income inclusion in context of Code Section 382 (.8); office conference re Bruno's structure (.4).
8/14/2003	Carter W Emerson, P.C.	4.50	Meet and call with S. Kupinsky, L. Donahue, G. McPherson and others re tax structure (2.0); telephone conferences re changes to plan, etc. and review same re tax (1.5); travel (at 1/2 time) (1.0).
8/14/2003	William R Welke, P.C.	2.60	Review and revise bankruptcy plan (.9); telephone conferences with G. McPherson re same (.5); telephone conference with L. Donahue, G. McPherson and Sherman and Sterling re plan changes (1.2).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/15/2003	Olga A Loy	4.00	Work on revisions to the Disclosure Statement and the Plan of Reorganization to incorporate structure changes (1.8); telephone conference with J. O'Neil re revised tax section in the Disclosure Statement (.4); office conference re tax discussion in the Bruno's disclosure statement (.4); review changes to the acquisition structure (.5); research tax consequences to the holders of Prepetition Foreign Secured Claims of revised tax structure (1.0); office conference re revised acquisition structure (.3).
8/15/2003	William R Welke, P.C.	3.30	Review disclosure statement revisions (1.1); office conferences re same (.7); draft revisions for plan language re merger issues (1.5).
8/18/2003	Olga A Loy	3.70	Work on the revisions to the tax consequences section for the Disclosure Statement (2.2); telephone conference with W. Welke re revisions of the disclosure statement portion describing the tax consequences to the holders of foreign prepetition credit facility claims (.5); telephone conference with J. Desai re revisions to the transaction structure (.3); review and comment on the revised Plan of Reorganization (.7).
8/18/2003	William R Welke, P.C.	2.20	Review and revise tax disclosure and plan provisions (1.2); telephone conference with R. Baneman re tax structure (.5); telephone conference with G. McPherson re same (.5).
8/19/2003	Olga A Loy	4.00	Draft tax consequences disclosure to the holders of prepetition foreign secured claims who receive New Exchange Notes in the restructuring (1.0); revise tax consequences disclosure to Exide and subsidiaries (1.2); telephone conference with J. O'Neil re revisions to the tax consequences disclosure (.3); telephone conference with W. Welke re revised tax disclosure (.4); telephone conference with T. Haigh re revisions to the Plan of Reorganization (.3); review revised Disclosure Statement (.8).
8/19/2003	Carter W Emerson, P.C.	3.50	Office conferences re Plan's tax structure (2.0); telephone conference with S. Kupinsky (.6), E. Berg (.4) and I. Harvie (.5) re same.
8/19/2003	William R Welke, P.C.	4.00	Review and revise terms of plan and exchange e-mails re same (2.0); telephone conference with R. Reinholt re structure (1.5); telephone conferences with G. McPherson and J. O'Neil re same (.5).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/20/2003	Olga A Loy	4.80	Research case law and IRS guidance on the application of Code Section 269 to taxable asset sales (3.0); office conference re Code Section 269 issues (.5); revise tax consequences disclosure to the holders of prepetition credit facility claims (.6); office conference re additional revisions to the Plan of Reorganization and the Disclosure Statement (.4); review revised Plan of Reorganization (.3).
8/20/2003	Carter W Emerson, P.C.	2.50	Office conference re tax structure of Disclosure Statement.
8/20/2003	William R Welke, P.C.	2.70	Review structural issues and telephone conferences with G. McPherson and R. Reinholdt re tax structure (2.5); office conference re 269 research (.2).
8/21/2003	Olga A Loy	2.40	Telephone conference with W. Welke re revised tax consequences section for the Disclosure Statement (.4); work on the revisions to the Plan of Reorganization (.5); review tax provisions in the revised Plan of Reorganization (.8); research application of Code Section 269 to asset sales (.7).
8/21/2003	Carter W Emerson, P.C.	3.00	Telephone conferences with S. Kupinsky and others re tax structure of Plan (.8); office conference re same (1.7); work on contact list for exit financing (.5).
8/21/2003	William R Welke, P.C.	1.30	Office conferences re amending plan re tax structure.
8/22/2003	Olga A Loy	3.80	Office conference re revisions to the Plan of Reorganization (.4); revise tax consequences discussion in the Disclosure Statement to reflect new acquisition structure (1.0); office conference re revisions to the Disclosure Statement (.5); review and revise tax provisions in the Plan of Reorganization (1.0); office conference re acquisition structure at Exide (.5); research status of Santorum legislation (.4).
8/22/2003	William R Welke, P.C.	0.70	Office conferences re amendments to disclosure statement.
8/23/2003	Olga A Loy	2.00	Office conference re revisions to the Disclosure Statement (.3); revise tax consequences discussion dealing with the transfer of business assets to Exide Holding III (1.0); telephone conference re revised tax consequences section (.2); review revisions to the Disclosure Statement prepared by W. Welke (.5).

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/23/2003	William R Welke, P.C.	0.60	Review and revise disclosure draft.
8/25/2003	Olga A Loy	1.20	Office conferences re revised Disclosure Statement and the Plan of Reorganization (.6); review Tax Consequences section in the Disclosure Statement (.6).
8/26/2003	William R Welke, P.C.	0.70	Telephone conference with G. Kaufman re steps and review plans re same.
8/27/2003	William R Welke, P.C.	2.90	Telephone conference with A. Kaufman and G. Kaufman re steps (1.1); telephone conference with G. McPherson re steps (.2); telephone conference with G. Kaufman re steps (1.2); telephone conference with J. O'Neil re steps (.4).
8/28/2003	William R Welke, P.C.	0.60	Exchange lengthy voicemails with J. O'Neil and G. Kaufman re tax structure and steps.
8/29/2003	Olga A Loy	2.20	Review revised Disclosure Statement and the Plan of Reorganization (1.6); research newly issues temporary regulations on cancellation of debt income (.6).
8/29/2003	William R Welke, P.C.	2.30	Draft and revise memo re plan steps and timing (1.9); exchange voicemails re new Section 108 regulations (.4).
8/31/2003	William R Welke, P.C.	1.00	Review new Section 108 regulations for consolidated groups.
	Total hours:	121.20	



# **MATTER 100**

**Matter 100 – Travel – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/12/2003	Claude W Irmis	2.90	Non-working travel to Princeton office (billed at half time).
8/12/2003	Charlotte L Westhoff	3.50	Travel to New Jersey for R2 document request (billed at half time).
8/12/2003	Kenneth Robling	3.50	Travel to New Jersey for document review (billed at half time).
8/12/2003	Wenette Bradford	3.50	Travel to Exide Technologies in Princeton, N.J. for document production (billed at half time).
8/12/2003	Michal Moskovich	3.50	Travel to Princeton office (billed at half time).
8/12/2003	Robert B Rittenhouse	4.00	Travel to Princeton, office (billed at half time).
8/13/2003	Claude W Irmis	0.10	Non-working travel to Princeton office (billed at half time).
8/13/2003	Claude W Irmis	0.20	Non-working travel to hotel (billed at half time).
8/14/2003	Claude W Irmis	0.20	Non-working travel to Princeton office (billed at half time).
8/14/2003	Claude W Irmis	0.20	Non-working travel to hotel (billed at half time).
8/14/2003	Courtney Jones	2.80	1/2 time for travel from Chicago to Philadelphia airport.
8/15/2003	Claude W Irmis	2.80	Non-working travel to Chicago office (billed at half time).
8/15/2003	Charlotte L Westhoff	2.60	Return travel from R2 document request (billed at half time).
8/15/2003	Courtney Jones	2.80	1/2 time for travel from Philadelphia to Chicago.
8/15/2003	Kenneth Robling	2.80	Return from document review project (New Jersey to Chicago, billed at one half time).
8/15/2003	Wenette Bradford	2.80	Travel to Chicago from Exide Technologies in Princeton, New Jersey (billed at half time).
8/15/2003	Michal Moskovich	2.70	Travel to Chicago office (billed at half time).
8/15/2003	Robert B Rittenhouse	2.60	Travel to Chicago office (billed at half time).
8/15/2003	Frederick L Block	2.50	Return travel from document review (billed at half time).
8/25/2003	Jason D Horwitz	3.00	Travel from Chicago, IL to Princeton, NJ for document review (billed at half-time).
8/25/2003	Catherine B Filippini	3.50	Prepare for and travel to Princeton, NJ (billed at half time).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/26/2003	Jason D Horwitz	3.50	Travel from Princeton, NJ to Chicago, IL following document review (billed at half-time).
8/26/2003	Catherine B Filippini	3.80	Prepare for and travel to Chicago, IL from Princeton, NJ (billed at half time).
	Total hours:	59.80	

# **MATTER 102**

**Matter 102 – Use, Sale or Lease Property/Abandonment – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/12/2003	Seth B Kutnick	1.20	Retrieve and distribute notice of sale of deminimis assets re Exide India.
8/15/2003	Biographical Research	0.50	Biographical Research Lee C. Russell.
8/26/2003	Catherine B Filippini	6.00	Retrieve and review files re lease documents per J. Horwitz.
	Total hours:	7.70	

# **MATTER 105**

**Matter 105 – Keystone Leasing Adversary Proceeding – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
7/29/2003	Robert B Ellis	2.80	Office conference re document review (.5); review defendants' document requests (2.0); telephone conferences with H. Pritchard re same (.3).
7/30/2003	Robert B Ellis	2.40	Review defendants' discovery requests (2.0); review stipulation for extension of time (.4).
8/1/2003	Jason D Horwitz	2.30	Review and analysis of Exide's document database re discovery requests (1.9); telephone conferences with E. Forte re extension for Finova to propound discovery requests (.2); exchange e-mail messages with E. Forte re same (.2).
8/4/2003	Jason D Horwitz	4.90	Continued review and analysis of Exide's document database re discovery requests (3.7); telephone conference with E. Forte re scheduling and discovery order (.2); revise stipulation re same (.3); office conferences re same and discovery responses (.7).
8/4/2003	Brandi L Chuboda	1.00	Review discovery requests.
8/5/2003	Jason D Horwitz	0.90	Office conferences re discovery issues (.6); telephone conference with C. Young re stipulation extending discovery deadlines (.2); e-mail message from B. Golub re same (.1).
8/7/2003	Jason D Horwitz	1.20	Continued review and analysis of Exide document database re discovery responses (1.0); e-mail message to S. Kupinsky and H. Pritchard re discovery schedule (.2).
8/8/2003	Jason D Horwitz	1.50	Continued review and analysis of Exide's document database re discovery requests.
8/11/2003	Jason D Horwitz	0.30	Office conference re discovery issues.
8/11/2003	Andrew M Kaufman, P.C.	0.70	Office conference re document production.
8/12/2003	Jason D Horwitz	0.70	Continued review and analysis of Exide's document database re discovery requests.
8/13/2003	Jason D Horwitz	2.80	Telephone conference with J. Hodkin re the equipment subject to the purported leases (.3); office conferences re strategy going forward (.3); revise stipulation modifying scheduling and discovery order (.2); telephone conference with H. Pritchard re same (.3); continued review and analysis of Exide's document database re discovery requests (1.7).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/13/2003	Frederick L Block	1.00	Office conference re case background (.3); office conference re document production (.2); review discovery requests (.5).
8/13/2003	Andrew M Kaufman, P.C.	0.80	Review credit documents in response to discovery request and advise re same.
8/14/2003	Jason D Horwitz	0.20	Exchange e-mail messages with B. Golub re discovery issues.
8/14/2003	Robyn E Marsh	1.00	Prepare documents for production (.8); office conference with R. Ellis re same (.2).
8/15/2003	Robyn E Marsh	1.00	Prepare documents for production (.7); office conference re same (.3).
8/18/2003	Jason D Horwitz	1.10	Exchange e-mail messages with several counsel re discovery deadlines (.4); correspond with H. Pritchard (.1) and E. Hutt (.1) re document production; telephone conference with J. Slatkin re same (.2); office conferences re same (.3).
8/20/2003	Jason D Horwitz	1.70	Telephone conferences with H. Pritchard (.2) and J. Slatkin (.2) re document production; correspond with E. Hutt (.1) and K. Braden (.1) re same; exchange e-mail messages with E. Hutt re same (.2); telephone conferences with B. Golub (.2) and L. Kalman (.2) re discovery deadlines; office conferences re same (.5).
8/22/2003	Jason D Horwitz	0.30	E-mail message from L. Kalman re discovery dates; (.1); office conferences re precedent request (.2).
8/25/2003	Jason D Horwitz	1.70	Prepare for document review at client's headquarters (1.2); revise discovery stipulation and agreed order (.3); e-mail message to all counsel re same (.2).
8/25/2003	James W Kapp	0.10	Review discovery stipulation.
8/26/2003	Jason D Horwitz	6.00	Review and analysis of the Debtors' lease documents re document production of same (4.9); meetings with J. Slatkin (.5) and K. Braden (.6) re same.
8/27/2003	Jason D Horwitz	0.20	Office conferences re discovery dates and document production.
8/28/2003	Robyn E Marsh	0.50	Edit and update case file index.
	Total hours:	37.10	



# **MATTER 106**

**Matter 106 – EnerSys Inc., Potential Complaint – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/1/2003	Heather M Heins	7.00	Prepare and assemble L. Donahue witness file (2.0); review and process pleadings (5.0).
8/1/2003	Mark A Camero	3.50	Review and prepare document list for deposition of N. Webb and gather exhibits to be used in the deposition (1.5); draft potential questions for deposition of N. Webb (2.0).
8/1/2003	Christine A Casey	4.00	Review file wrappers for Exide marks including EXIDE, EXIDE (stylized), EXIDE IRONCLAD, ESB, TITAN, GBC, LIBERATOR, TITAN AND WILLARD trademarks (.5); add to marks to Exide trademark summary chart (.7); review dates and check status on PTO and compare to file wrappers (.8); proof chart for accuracy (1.3); forward to L. Barr for review (.3); office conference re same (.4).
8/1/2003	Erik W Chalut	1.50	Correspondence with L. Barr re EnerSys discovery issues (.4); e-mail to L. Donahue re verifying interrogatories (.4); attend to matters re EnerSys discovery (.7).
8/1/2003	Mandy L Gardner	0.50	Process and assemble witness file, per L. Barr.
8/1/2003	Lisa M Barr	4.30	Review and revise supplemental responses to discovery (3.0); teleconference with R. Furey re same (.3); teleconference with R. Furey and L. Donahue re depositions (1.0).
8/1/2003	Paul R Garcia	1.00	Analyzing supplemental discovery responses and email communications to team re same.
8/1/2003	Ross M Weisman	1.00	Office conference re facts of case and issues relating to the same (.4); review Trademark License Agreement between Exide and Yuasa Battery (.6).
8/3/2003	Neil Benchell	2.00	Edit and update legal memorandum re trademark rejection.
8/3/2003	Lisa M Barr	6.50	Review case law re rejection of trademark license issues (2.5); review L. Donahue witness file (2.0); prepare to defend L. Donahue deposition (2.0).
8/4/2003	Heather M Heins	2.00	Assemble correspondence re Enersys litigation (1.0); process case files re same (1.0).

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/4/2003	Mark A Camero	7.20	Prepare complete outline for the deposition of J. Shea (2.2); review all key production documents for additional deposition exhibits (.5); create chronological list of events tied to documents and exhibits to be used in deposition of J. Shea (1.5); prepare complete outline for the deposition of N. Webb (1.0) create chronological list of events tied to documents and exhibits to be used in deposition of J. Shea (2.0).
8/4/2003	Melissa A Sefcik	4.00	Assemble pleadings & process documents into database (2.5); index discovery motions into database (1.5).
8/4/2003	Erik W Chalut	1.40	Correspondence with attorneys handling Donahue deposition regarding whether we offered her as 30(b)(6) witness to be dealt with today (.5); organize correspondence and files in my possession received re Yuasa matter and forward same (.5); office conference re same (.4).
8/4/2003	Neil Benchell	6.50	Complete first draft of legal memorandum re trademark rejection (5.5); begin research re aspects of rejection under 11 U.S.C. 365 (1.0).
8/4/2003	Lisa M Barr	11.00	Prepare notes for L. Donahue deposition (3.0); meet with L. Donahue in advance of her deposition (4.0); defend L. Donahue deposition (4.0).
8/4/2003	Paul R Garcia	2.40	Email memoranda to and from team re depositions and discovery strategy and revisions to and analysis of deposition notices (1.1); drafting discovery brief (1.3).
8/4/2003	Ross M Weisman	0.50	Continue reviewing trademark license (.3); review 30(b)(6) notice (.2).
8/5/2003	Heather M Heins	3.00	Assemble correspondence and pleadings (2.0); assemble witness files for upcoming depositions (1.0).
8/5/2003	Mark A Camero	3.80	Office conference re preparation for depositions of J. Shea and N. Webb (.2); office conference re assisting with the preparation for the deposition of P.M. Elherman (.6); gather documents and potential exhibits to be used in the deposition of M. Elherman (3.0).
8/5/2003	Melissa A Sefcik	6.00	Assemble witness files (1.5); assemble production documents for upcoming depositions (4.5).

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/5/2003	Erik W Chalut	1.00	Office conference re status of EnerSys issues and discovery.
8/5/2003	Mandy L Gardner	2.00	Assemble EnerSys production documents into database.
8/5/2003	Neil Benchell	8.00	Review documents received from EnerSys (6.5); research issue re standard for rejection (1.5).
8/5/2003	Lisa M Barr	6.80	Office conference re deposition outlines and presentation of evidence at hearing (1.2); review and revise deposition outlines prepared by M. Camero (.8); review legal research re contract rejection and office conference re same (.8); review documents for use at Webb and Shea depositions (2.5); revise deposition notice to EnerSys (1.5).
8/5/2003	Michelle Francis	10.00	Office conference re demonstratives, strategy, issues (1.2); office conference re deposition preparation (.5); review documents to prepare for M. Ehlerman deposition (3.7); review pleadings to prepare for same (2.5); review documents received for production (2.1).
8/5/2003	Paul R Garcia	2.90	Analysis of potential witnesses to interview and call at hearing (1.5); review and analysis of evidence gathered to date (1.4).
8/5/2003	Ross M Weisman	0.50	Office conferences re issues in case.
8/6/2003	Heather M Heins	7.50	Assemble Interrogatories and Requests for Production binders (1.5); assemble correspondence (1.5); assemble witness file for upcoming deposition (.5); assemble pleadings and case files (1.0); review and process Exide production documents into database (3.0).
8/6/2003	Mark A Camero	15.10	Office conference re the outline for the deposition of P.M. Elherman (.1); complete outline for same with 15 pages of potential questions (4.5); arrange, organize and copy exhibits to be used in P.M. Elherman deposition (3.5) prepare chronology chart of exhibits for deposition of P.M. Elherman (2.0); complete deposition outlines for the depositions of J. Shea and N. Webb and draft an additional 10 pages of questions to be asked at the depositions (3.0); complete and finalize exhibit lists for J. Shea and N. Webb Deposition (2.0).
8/6/2003	Erik W Chalut	0.40	Correspondence with L. Barr and company re Exide in-house counsel as part of Exide's privilege review.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/6/2003	Gary M Vogt	1.80	Office conference with M. Sefcik to discuss issues re previous Exide productions (.5); review production log materials re Exide productions to gather information requested re previous productions (1.3).
8/6/2003	Mandy L Gardner	6.00	Review and process EnerSys and Exide production documents into database.
8/6/2003	Neil Benchell	6.00	Complete research on standard for rejection (3.0); redraft legal memorandum based on review from P. Garcia (3.0).
8/6/2003	Lisa M Barr	11.10	Review documents produced by EnerSys (6.1); prepare for Webb and Shea depositions (5.0).
8/6/2003	Michelle Francis	7.30	Prepare for M. Ehlerman deposition (4.0); review documents, pleadings, correspondence to prepare for same (1.5); review documents for production (1.8).
8/6/2003	Paul R Garcia	1.50	Analysis of discovery issues and strategy re depositions.
8/6/2003	Ross M Weisman	0.30	Review email correspondence from N. Benchell re breach of executory contract provisions in bankruptcy context.
8/7/2003	Heather M Heins	11.00	Review and process pleadings into database (1.0); review and process Exide production documents into database (10.0).
8/7/2003	Mark A Camero	7.50	Office conference re finalizing P.M. Elherman deposition outline and transporting documents to Pennsylvania (.4); work with M. Sefcik re document production for P.M. Elherman's deposition and searching for particular documents and schedules (.6); review new documents that have been produced to Exide (6.5).
8/7/2003	Melissa A Sefcik	14.00	Assemble production documents for upcoming depositions (8.5); assemble production documents into database (5.5).
8/7/2003	Erik W Chalut	0.70	Correspond with Yuasa team re various discovery issues.
8/7/2003	Mandy L Gardner	7.50	Review and process Exide production documents into database.
8/7/2003	Neil Benchell	1.00	Prepare outline for 30(b)(6) deponent from interrogatories.
8/7/2003	Lisa M Barr	8.50	Prepare for Webb and Shea depositions (2.0); take Webb and Shea depositions (6.5).

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/7/2003	Michelle Francis	1.30	Prepare for M. Ehlerman deposition (.8); review documents, pleadings, correspondence to prepare for same (.5).
8/7/2003	Paul R Garcia	5.50	Researching and drafting discovery brief.
8/8/2003	Heather M Heins	11.00	Review and process Exide production documents into database (8.0); assemble exhibits for upcoming depositions (3.0).
8/8/2003	Mark A Camero	8.60	Complete document review of new documents produced to Exide (5.5); draft reply and objections to EnerSys' 30(b)(6) request (2.5); office conference to finalize P.M. Elherman documents needed for deposition on August 12, 2003 (.6).
8/8/2003	Melissa A Sefcik	12.00	Assemble & review production documents for upcoming depositions (10.0); prepare documents for production (2.0).
8/8/2003	Neil Benchell	4.50	Complete second draft of legal memorandum (2.5); confer with expert and prepare for expert visit (2.0).
8/8/2003	Lisa M Barr	7.80	Review new discovery requests from EnerSys (.5); office conference re second set of discovery requests and responses (.5); review documents for production (2.0); teleconference with client representative from transportation business and R. Furey (.5); prepare draft discovery responses (4.3).
8/8/2003	Paul R Garcia	1.50	Telephone conference with R. Furey re strategy and discovery issues and analysis of draft discovery (.7); analysis of and revisions to response to 30(b)(6) deposition notice (.8).
8/8/2003	Matthew N Kleiman	1.20	Attention to issues re witness designation (.8); telephone conference with S. Kupinsky re same (.4).
8/8/2003	Ross M Weisman	0.30	Review document requests.
8/9/2003	Heather M Heins	3.00	Assemble and process all case files.
8/9/2003	Melissa A Sefcik	2.50	Assemble witness file for upcoming M. Bregman deposition (1.5); assemble documents for production (1.0).
8/9/2003	Lisa M Barr	3.20	Revise second set of discovery requests (2.0); revise response and objections to deposition notice of EnerSys (1.2).
8/9/2003	Matthew N Kleiman	0.60	Conduct telephone conference with S. Kupinsky re case status and witness designations.

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/10/2003	Heather M Heins	2.80	Process deposition exhibits into database (1.0); assemble all case files (1.8).
8/10/2003	Melissa A Sefcik	1.50	Assemble production documents for upcoming depositions.
8/10/2003	Lisa M Barr	2.50	Review and revise discovery responses and requests (1.7); office conference re same (.3); update team re same (.5).
8/10/2003	Michelle Francis	4.50	Prepare for M. Ehlerman deposition (3.0); review documents, pleadings, correspondence to prepare (1.5).
8/11/2003	Heather M Heins	13.80	Assemble deposition exhibits (2.8); review and process Exide production documents into database (11.0).
8/11/2003	Mark A Camero	2.50	Draft new question to be asked at P.M. Elherman deposition.
8/11/2003	Melissa A Sefcik	11.00	Assemble production documents for upcoming depositions & prepare witness files.
8/11/2003	Erik W Chalut	0.20	Review list of worldwide counsel of Exide to assist in privilege review and e-mail L. Barr re same.
8/11/2003	Mandy L Gardner	6.50	Review and process Exide document production into database.
8/11/2003	Neil Benchell	5.20	Complete document review of EnerSys documents (2.5); review deposition transcript (1.0); meet and assist with expert witness (1.7).
8/11/2003	Lisa M Barr	13.90	Gather and review documents for production (2.0); meet with M. Bregman in advance of his deposition (7.0); teleconferences with R. Furey and client re discovery responses (2.0); revise discovery responses per client comments (2.9).
8/11/2003	Michelle Francis	12.00	Review documents, pleadings, correspondence to prepare for M. Ehlerman deposition (10.0); office conference re same (2.0).
8/11/2003	Paul R Garcia	0.80	Review, analysis and revisions to 30(b)(6) response and objections.
8/11/2003	Stephen Johnson	0.20	Telephone conference re forthcoming deposition.
8/11/2003	Matthew N Kleiman	1.50	Review and revise discovery requests.
8/12/2003	Heather M Heins	10.50	Review and process Exide production documents into database.
8/12/2003	Mark A Camero	5.50	Take and attend deposition of P.M. Elherman in Reading, Pennsylvania.

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/12/2003	Melissa A Sefcik	7.00	Assemble documents for production (4.0); assemble documents for deposition (3.0).
8/12/2003	Mandy L Gardner	5.30	Review and process Exide document production into database.
8/12/2003	Neil Benchell	7.50	Review Exide documents to be sent out (3.5); meet and assist with expert (1.0); review pertinent law and prepare legal pleading (3.0)
8/12/2003	Lisa M Barr	12.30	Meet with M. Bregman in advance of his deposition (1.5); defend M. Bregman deposition (4.2); teleconference with client re same and re discovery issues (.8); revise discovery responses (1.0); revise team task list (1.3); conduct legal research re discovery issues (3.0); confer with M. Sefcik re production of documents and other case management issues (.5).
8/12/2003	Michelle Francis	12.00	Review documents, pleadings, correspondence to prepare for M. Ehlerman deposition (3.7); depose M. Ehlerman (5.5); notes and analyses re same (2.8).
8/12/2003	Paul R Garcia	3.80	Prepare for and telephone conferences with client and co-counsel (R. Furey) re discovery issues and strategy and analysis of same.
8/12/2003	Matthew N Kleiman	0.90	Attention to strategy re 30(b)(6) deposition designations and conference call with S. Kupinsky re same.
8/12/2003	Gayle M Lodygowski	4.00	Process Enersys documents into database.
8/13/2003	Mark A Camero	6.60	Office conference re new matters, current status of case, production of new documents, and assignment of duties (.6); complete outline for R. Zuidema and draft 15 pages of questions for deposition (3.0); organize and arrange all documents and exhibits that must be sent to Pennsylvania for deposition (3.0).
8/13/2003	Melissa A Sefcik	13.00	Communicate upcoming discovery deadlines (1.0); assemble production documents for expert (5.0); process & assemble production documents for depositions (7.0).
8/13/2003	Mandy L Gardner	7.00	Review and process Exide production documents into database (5.0). Process and assemble production documents for expert (2.0).



<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/13/2003	Neil Benchell	7.00	Continue legal research in preparation for trial (4.0); meet with team to review case (1.0); prepare further legal documents and memoranda (2.0).
8/13/2003	Lisa M Barr	7.40	Participate in team strategy session re discovery to date (1.0); revise response and objections to discovery (3.4); review L. Donahue deposition for confidentiality (.5); revise task list (.5); prepare for deposition of D. Zuidema (2.0).
8/13/2003	Michelle Francis	1.00	Conference with team re strategy, action items, discovery.
8/13/2003	Paul R Garcia	1.80	Revising discovery pleadings and office conference re same (.8); team strategy conference re discovery and trial (1.0).
8/13/2003	Gayle M Lodygowski	5.00	Process Enersys documents into database.
8/14/2003	Mark A Camero	2.00	Draft additional questions to be asked during the R. Zuidema deposition.
8/14/2003	Mandy L Gardner	3.00	Review and process Exide production documents into database.
8/14/2003	Neil Benchell	6.70	Prepare pro hac vice forms and coordinate with local counsel (2.0); Identify parties for further discovery (2.2); contact party for further discovery information (.5); complete additional legal forms and memoranda (2.0)
8/14/2003	Business/Ind Research	1.50	Business/Industry Research Yuasa, Yuasa Battery and Hillman Co.
8/14/2003	Lisa M Barr	7.50	Review R. Zuidema witness file (2.0); review and revise R. Zuidema deposition (4.0); review and revise second set of discovery (.5); review EnerSys depositions in preparation for R. Zuidema deposition (1.0).
8/14/2003	Michelle Francis	11.00	Review and revise interrogatories, requests for production, deposition notices, 30(b)(6) deposition notice, third party subpoenas and requests for admission (8.4); office conference re same (.7); review M. Ehlerman deposition transcript and designate (1.9).
8/14/2003	Paul R Garcia	3.50	Revising, drafting party and third party discovery, and analysis of same (3.0); office conference re same (.5).
8/15/2003	Mark A Camero	5.50	Attend and take deposition of D. Zuidema.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/15/2003	Melissa A Sefcik	8.00	Assemble production documents for upcoming depositions (4.0); assemble pleadings for filing (2.0); process & assemble witness files (2.0).
8/15/2003	Mandy L Gardner	9.50	Review and process Exide production documents into database (5.0); process and assemble case files (1.0); process and assemble witness file for deposition (3.5).
8/15/2003	Neil Benchell	6.50	Prepare and distribute various subpoenas.
8/15/2003	Bibliographic Research	0.80	Bibliographic Research Michael Ehlerman testimony.
8/15/2003	Lisa M Barr	6.20	Take deposition of R. Zuidema (5.7); draft letter re L. Donahue errata and confidentiality designations and review errata for L. Donahue (.5).
8/15/2003	Michelle Francis	9.20	Review and revise third party subpoenas (4.8); conference re same (.5); review and revise last round of interrogatories, requests for production, deposition notices and 30(b)(6) deposition notice (3.9).
8/15/2003	Thomas P Gallo	1.00	Arrange for service of six subpoenas.
8/15/2003	Paul R Garcia	1.00	Further review, revision and analysis of draft discovery requests review and analysis of deposition testimony.
8/15/2003	Matthew N Kleiman	0.50	Review expert due diligence request list and draft correspondence to R. Furey re same.
8/16/2003	Mandy L Gardner	7.00	Review and process Exide production documents into database.
8/16/2003	Michelle Francis	3.80	Review and revise motion for summary judgment.
8/17/2003	Melissa A Sefcik	7.00	Assemble production documents into database (5.0); process documents for witness file (2.0).
8/17/2003	Mandy L Gardner	11.00	Review and process Exide production documents into database (9.0); process and assemble witness file (2.0).
8/18/2003	Heather M Heins	14.10	Assemble all correspondence, pleadings and case files (10.1); review and process Exide production documents into database (4.0).
8/18/2003	Mark A Camero	7.50	Office conference re new matters, and to discuss strategy for upcoming trial on October 9 and 10 (1.0); research re a finding a expert in brand names and trademarks (3.5); review EnerSys' request for document production and begin to draft reply to said document request (3.0).

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/18/2003	Melissa A Sefcik	9.00	Assemble deposition exhibits (1.0); assemble production documents for witness files (3.0); assemble & process production documents (5.0).
8/18/2003	Mandy L Gardner	9.00	Review and process EnerSys production into database (4.5); process and assemble key documents (4.5).
8/18/2003	Neil Benchell	6.50	Review material and draft deposition outline for John Craig.
8/18/2003	Paul R Garcia	3.00	Research re and analysis of draft discovery brief (2.4); telephone conference with potential witness and analysis of issues re same (.6).
8/19/2003	Heather M Heins	12.20	Review and process Exide and EnerSys production documents into database.
8/19/2003	Tom Monagan	0.50	Office conference to discuss summary judgment motion and drafting of additional motions.
8/19/2003	Mark A Camero	8.70	Review key production documents and arrange and organize documents that could be used with an interview of S. Fried re the 1991 asset purchase agreement (7.2); research for a potential brand expert (1.5).
8/19/2003	Melissa A Sefcik	9.00	Assemble production documents for witness files (7.0); review & process pleadings re upcoming depositions (.5); assemble deposition transcripts & exhibits (1.5).
8/19/2003	Mandy L Gardner	8.80	Review and process EnerSys production documents into database.
8/19/2003	Neil Benchell	3.70	Assist legal assistant with review of documents (.7); research trial specific information (2.0); prepare and distribute copies of subpoenas to opposing counsel (1.0).
8/19/2003	Lisa M Barr	0.30	Review correspondence re trademark rejection litigation.
8/19/2003	Michelle Francis	1.50	Conference with R. Furey re discovery issues, deposition preparation and scheduling (1.1); conference with N. Benchell re service of subpoenas, conference with counsel re deposition scheduling (.4).
8/19/2003	Paul R Garcia	2.30	Telephone conference with co-counsel and K&E team re strategy for hearing and for remaining fact discovery period and analysis of issues re same.

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/20/2003	Heather M Heins	9.40	Review and process EnerSys production documents into database.
8/20/2003	Tom Monagan	2.00	Review administrative services and asset purchase agreements as background (1.1); review trademark license agreement and other IP schedules to APAs (.9).
8/20/2003	Mark A Camero	5.90	Office conference to discuss draft response to EnerSys' request for document production (.2); redraft responses and objections and circulate to team for review (2.5); office conference to discuss specific objections to EnerSys' document request (.2); incorporate all changes to Exide's reply to EnerSys' document request and recirculate draft to team for review and comment so Reply may be filed on August 21 (3.0).
8/20/2003	Melissa A Sefcik	10.00	Assemble production documents for upcoming depositions (5.0); process documents into database (4.0); communicate logistics re hearing arrangements (1.0).
8/20/2003	Mandy L Gardner	3.50	Review and process EnerSys documents into database.
8/20/2003	Neil Benchell	2.00	Office conference to discuss subpoenas and contact object of subpoenas (1.0); research court transcripts (.5); begin updating case outline document (.5).
8/20/2003	Lisa M Barr	7.20	Review subpoenas and contact parties served with same to inquire about document production (1.1); office conference re final round of discovery, depositions and hearing strategy (2.0); draft outline for hearing proofs and office conferences re same (3.1); review draft dispositive motions (1.0).
8/20/2003	Michelle Francis	9.00	Review pleadings, transcripts, documents to prepare for deposition of N. Bright.
8/20/2003	Paul R Garcia	4.50	Analysis of discovery responses and pleadings to shape strategy as fact discovery comes to a close (3.0); office conferences re same (1.5).
8/20/2003	Matthew N Kleiman	1.10	Review and revise discovery responses.
8/21/2003	Heather M Heins	7.50	Assemble and process all pleadings into database (5.0); assemble all case files (2.5).
8/21/2003	Tom Monagan	4.30	Review additional pleadings and read all cited cases.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/21/2003	Mark A Camero	4.30	Research additional brand experts (1.0); office conference re potential brand experts (.5); call to L. Donahue to get documents that are responsive to EnerSys' document request (.3); finalize Exide response and objections to Enersys' Document request and serve on opposing counsel (2.5).
8/21/2003	Mandy L Gardner	2.00	Review and process witness files in Exide database.
8/21/2003	Neil Benchell	8.00	Review deposition transcripts taken (5.0); continue drafting case outline document (3.0).
8/21/2003	Lisa M Barr	1.80	Review M. Bregman deposition for confidentiality (1.0); communicate with team re deposition designations and discovery issues (.8).
8/21/2003	Michelle Francis	6.00	Conference re deposition of N. Bright (4.0); review pleadings, transcripts, documents to prepare for same (2.0).
8/21/2003	Paul R Garcia	4.00	Review and analysis of, and revisions to, supplemental responses to discovery requests (1.8); analysis of potential testimony and evidence to present at hearing (2.2).
8/22/2003	Heather M Heins	5.50	Assemble and process all pleadings into database (2.0); assemble all case files (3.5).
8/22/2003	Tom Monagan	2.40	Review and revise dispositive motion.
8/22/2003	Tom Monagan	0.30	Office conference re dispositive motion.
8/22/2003	Mandy L Gardner	4.00	Assemble and process witness file.
8/22/2003	Neil Benchell	7.50	Review deposition transcripts (3.0); update case outline document (1.5); review third-party produced documents (1.0); review hearing transcripts (2.0).
8/22/2003	Lisa M Barr	1.00	Teleconference with M. Bregman re deposition designations (.2); double check designations and draft letter re same to opposing counsel (.8).
8/22/2003	Michelle Francis	6.00	Defend N. Bright deposition (4.0); notes and analyses re same (2.0).
8/22/2003	Paul R Garcia	3.50	Review and analysis of deposition testimony (2.8); communications with team re discovery strategy moving forward (.7).
8/23/2003	Tom Monagan	9.00	Research jurisdictional case law on ambiguity of contracts, parol evidence, and case law re trademarks as executory agreements (4.0); draft dispositive motion re same (5.0).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/23/2003	Michelle Francis	4.00	Review and revise disposition motion (3.1); conference with T. Monagan re same (.9).
8/24/2003	Neil Benchell	2.00	Review deposition transcripts (1.5); research standard for rejection (.5).
8/24/2003	Michelle Francis	2.00	Review and revise disposition motion.
8/24/2003	Paul R Garcia	2.00	Analysis and review of draft brief.
8/25/2003	Heather M Heins	5.00	Review and research production documents (2.5); assemble deposition transcripts (2.5).
8/25/2003	Tom Monagan	1.30	Review documents to uncover Exhibit R (.3); review and revise dispositive motion (1.0).
8/25/2003	Erik W Chalut	0.60	Office correspondence with L. Barr and P. Garcia re discovery issues as they relate to bankruptcy proceeding.
8/25/2003	Mandy L Gardner	4.00	Research and review document production (3.0); process and assemble deposition designations (1.0).
8/25/2003	Neil Benchell	8.00	Update case outline with research and deposition references (1.5); research standard for rejection (2.5); review deposition transcripts (4.0).
8/25/2003	Lisa M Barr	3.50	Review EnerSys objections to Exide's deposition notices and update team re same (1.0); teleconference with opposing counsel re same (.5); review correspondence re confidentiality designations and instruct M. Gardner re same (.5); confer with N. Benchell re subpoenas (.2); review hearing transcripts and prior discovery correspondence (1.3).
8/25/2003	Michelle Francis	0.20	Office conference re strategy, discovery disputes.
8/25/2003	Paul R Garcia	11.00	Further research and revising of draft brief and conferences with team re same (9.5); strategy conferences and analysis of discovery and deposition issues in preparation for hearing (1.5).
8/25/2003	Matthew N Kleiman	0.50	Review correspondence re 30(b)(6) discovery disputes.
8/26/2003	Heather M Heins	6.00	Review and process deposition exhibits into database (3.0); assemble case files (2.0); review and process pleadings into database (1.0).
8/26/2003	Tom Monagan	0.50	Office conference re edits to dispositive motion (.2); correspondence and conference with P. Garcia re motion (.3).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/26/2003	Mark A Camero	8.00	Review documents sent by N. Bregman for production and responsiveness to EnerSys' document request (4.5); organize, gather and arrange responsive documents to be sent to EnerSys before the close of discovery with M. Sefcik (2.0); review contract sheet from L. Donahue for production to EnerSys (1.5).
8/26/2003	Neil Benchell	2.00	Update case outline with new research (1.5); assist review of documents to be disclosed (.5).
8/26/2003	Lisa M Barr	5.10	Review and provide edits to dispositive motion (1.0); conduct and review legal research for dispositive motion (.8); review and revise case outline prepared by N. Benchell and communicate edits to N. Benchell (1.0); review documents produced pursuant to subpoena to third party (1.0); confer with team re discovery and deposition issues (.2); review R. Zuidema transcript (1.1).
8/26/2003	Lisa M Barr	1.50	Review deposition transcript of R. Zuidema (1.0); revise task list (.5).
8/26/2003	Michelle Francis	4.20	Review and revise motion, accompanying papers, and exhibits.
8/26/2003	Paul R Garcia	3.00	Conferences and communications with team re discovery briefing and strategy and revising brief.
8/27/2003	Heather M Heins	6.00	Assemble correspondence (1.0); assemble case files (2.0); assemble documents for production (3.0).
8/27/2003	Tom Monagan	0.50	Review and revise dispositive motion.
8/27/2003	Mark A Camero	6.20	Review Delaware bankruptcy rules of procedure to properly file Exide's Summary Judgment Motion (3.0); office conference with M. Francis re filing of Exide's Summary Judgment motion (.2); review case law cited in Summary Judgment Motion and cite check for accuracy and correct statements of law (3.0).
8/27/2003	Melissa A Sefcik	14.00	Assemble & process documents for production (11.0); review & cite check brief for filing (1.5); process, assemble requested deposition transcripts & exhibits (1.5).
8/27/2003	Mandy L Gardner	4.50	Process and assemble deposition designations (1.5); bates label third party documents (2.0); research production documents for letter re consent to trademarks (1.0).

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/27/2003	Neil Benchell	10.20	Update case outline (1.0); review documents to send out (9.2).
8/27/2003	Lisa M Barr	15.50	Review documents for production (12.0); teleconference with R. Furey, B. Bosch, P. Garcia and M. Francis re discovery, briefing and trial strategy (2.0); revise task list and review deposition objections of EnerSys (1.5).
8/27/2003	Michelle Francis	7.00	Conferences with team re strategy (2.8); review and revise motion and accompanying papers (3.0); draft declarations in response to subpoenas (1.2).
8/27/2003	Paul R Garcia	8.00	Further revise and analyze draft brief (6.0); conferences with team re same (2.0).
8/28/2003	Heather M Heins	10.50	Assemble deposition exhibits (1.5); prepare documents for production (9.0).
8/28/2003	Mark A Camero	9.00	Office conference re the status of the Summary Judgment Motion (.5); gather and outline the exhibits that are used in the Summary Judgment Motion with M. Sefcik (1.5); calls to local counsel to discuss what is required to file the Summary Judgment Motion (.5); draft actual Motion that will accompany Summary Judgment Memorandum, reformat summary Judgment Memorandum to conform to District Court rules and draft Order for the court (5.0); proofread Motion and Memorandum for filing on August 28 (1.5).
8/28/2003	Melissa A Sefcik	12.00	Assemble documents for production.
8/28/2003	Mandy L Gardner	7.00	Assemble documents for production.
8/28/2003	Neil Benchell	1.00	Complete review of documents for production.
8/28/2003	Lisa M Barr	4.00	Review and edit memorandum in support of summary judgment (1.0); review documents for production (2.0); review depositions of EnerSys representatives and draft summary document re same (1.0).
8/28/2003	Michelle Francis	8.00	Review and revise motion and accompanying papers (5.5); review and revise declarations in response to subpoenas, review correspondence from EnerSys (2.5).



<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/28/2003	Paul R Garcia	7.00	Additional revisions to and drafting of brief and motion (5.0); conferences with co-counsel and opposing counsel re depositions and discovery (1.5); drafting correspondence to opposing counsel re deposition and discovery issues (.5).
8/28/2003	Matthew N Kleiman	2.30	Review and revise motion for summary judgment (1.8); review cease and desist letter from Enersys (.5).
8/29/2003	Mary Medina	2.00	Assemble documents for production.
8/29/2003	Heather M Heins	15.20	Assemble documents for production.
8/29/2003	Mark A Camero	5.00	Finalize Motion of Summary judgment, accompanying memorandum, and exhibits (3.5); assemble all documents and send to Local Counsel to file with Court (1.0).
8/29/2003	Melissa A Sefcik	15.00	Assemble documents for production.
8/29/2003	Mandy L Gardner	5.50	Assemble documents for production.
8/29/2003	Mandy L Gardner	3.00	Assemble documents for production.
8/29/2003	Neil Benchell	4.50	Review documents for production to opposing party.
8/29/2003	Lisa M Barr	5.70	Review and quality check documents for production (5.3); communicate with team re discovery strategy (.4).
8/29/2003	Michelle Francis	4.80	Review and revise motion (2.0); conference with N. Bright re transcript signature (1.0); review documents for production (.5); review and revise declarations in response to subpoenas (.9); conference with counsel for Hillman re same (.4).
8/29/2003	Paul R Garcia	2.00	Telephone conference with opposing counsel, correspondence to opposing counsel re deposition scheduling, and email communications with team re same (1.2); final edits to and communications with team re brief (.8).
8/29/2003	Matthew N Kleiman	0.50	Review Enersys discovery responses and objections.
	Total hours:	1,087.30	

# **MATTER 107**

**Matter 107 – SWIB Litigation – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/5/2003	Adam J Gorman	1.60	Update D&O adversary binders re recently filed pleadings.
8/5/2003	John A Amash	0.20	Discuss possible expert testimony with S. Hirsch at Blackstone.
8/7/2003	Matthew N Kleiman	1.80	Review correspondence from M. Metz re settlement issues (.4); telephone conference with client re same (.5); conduct telephone conference with M. Metz re settlement issues (.4); draft memorandum to client re same (.5).
8/8/2003	Matthew N Kleiman	0.80	Attention to negotiation re settlement of SWIB disputes.
8/13/2003	John A Amash	0.20	Office conference re Third Circuit appeal.
8/20/2003	Matthew N Kleiman	0.60	Attention to issues re settlement of SWIB litigation.
8/21/2003	Timothy D Elliott	0.40	Conference calls re status of adversary action against Equity Committee.
8/25/2003	Bibliographic Research	0.80	Bibliographic Research Bylaws for Exide from 1980 to present.
8/25/2003	Matthew N Kleiman	0.70	Negotiation with M. Metz re settlement of SWIB litigation (.4); conference with S. Kupinsky re same (.3).
8/26/2003	Business/Ind Research	0.50	Business/Industry Research Exide by-laws, continued.
8/26/2003	Matthew N Kleiman	0.50	Attention to issues re settlement of SWIB litigation.
8/29/2003	Jodi K Newman	0.30	Locate specified pleadings for attorney review.
	Total hours:	8.40	

# **MATTER 108**

**Matter 108 – Former Officers Litigation – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/4/2003	Ross M Kwasteniet	7.90	Research in support of objection to Pearson motion to stay adversary proceeding.
8/5/2003	Ross M Kwasteniet	9.30	Draft objection to Pearson motion to stay adversary proceeding.
8/5/2003	Seth B Kutnick	2.20	Began to prepare Pearson and Hawkins document production.
8/5/2003	Jordan G Galassie	1.10	Westlaw research re former officers litigation.
8/5/2003	Matthew N Kleiman	0.50	Review and revise objection to motion to stay proceedings.
8/6/2003	Ross M Kwasteniet	5.40	Revise objection to Pearson motion to stay adversary proceeding.
8/6/2003	Seth B Kutnick	1.60	Continue to prepare Pearson and Hawkins document production.
8/7/2003	Ross M Kwasteniet	1.20	Revise objection to Pearson motion to stay adversary proceeding.
8/7/2003	Seth B Kutnick	4.40	Continue to prepare Pearson and Hawkins document production.
8/7/2003	Business/Ind Research	1.00	Business/Industry Research find cases listed and pull off its history of citation.
8/7/2003	James W Kapp	4.00	Revise objection to Pearson motion to stay adversary.
8/7/2003	Matthew N Kleiman	1.50	Review and revise response to stay motion.
8/8/2003	Ross M Kwasteniet	3.80	Finalize objection to Pearson motion to stay adversary proceeding.
8/8/2003	James W Kapp	2.30	Revise objection to Pearson stay motion and attend to issues re same.
8/14/2003	James W Kapp	0.80	Review Pearson discovery requests.
8/18/2003	Adam J Gorman	5.60	Retrieve and assemble materials for D&O adversary binders (4.9) ; update D&O adversary binders (.7).
8/18/2003	James W Kapp	1.70	Review Hawkins joinder to Pearson's motion to stay proceeding (.1); develop/prepare argument/response re hearing on Pearson motion to stay proceedings (1.4); attend to Hawkin's request to extend discovery (.2).
8/19/2003	James W Kapp	0.30	Attend to Hawkins request to modify discovery schedule.
8/20/2003	Adam J Gorman	2.20	Assemble objection binders for adversary proceedings.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/20/2003	Ross M Kwasteniet	4.10	Review discovery requests from Pearson, Hawkins and Gauthier and formulate initial outline of responses to same.
8/20/2003	Claude W Irmis	1.40	Coordinate edits to R2 document production response chart (.5); search, retrieve and assemble diligence materials re Gauthier, Hawkins and Pearson document production (.9).
8/21/2003	Ross M Kwasteniet	2.10	Review discovery requests by Pearson, Hawkins and Gauthier and formulate initial outline of responses to same.
8/21/2003	James W Kapp	0.10	Review inquiries from Pearson counsel re Pearson financial backup.
8/22/2003	Claude W Irmis	2.50	Retrieve and distribute diligence materials re Gauthier, Hawkins and Pearson document production requests.
8/22/2003	James W Kapp	1.90	Attend to issues re preparation of discovery responses to Pearson/Hawkins/Gauthier discovery.
8/25/2003	Adam J Gorman	0.60	Update D&O adversary pleadings.
8/25/2003	Ross M Kwasteniet	8.20	Draft responses to Pearson and Hawkins discovery requests.
8/25/2003	Claude W Irmis	2.80	Continue to coordinate retrieval and distribution of diligence materials re Gauthier, Hawkins and Pearson document production (2.2); assemble and organize R2 document production materials (.6).
8/26/2003	Adam J Gorman	1.20	Amend and update D&O adversary binders.
8/26/2003	Ross M Kwasteniet	7.10	Draft responses to Pearson and Hawkins discovery requests.
8/26/2003	Claude W Irmis	2.30	Retrieve and distribute diligence materials re Hawkins, Pearson and Gauthier discovery requests (1.2); coordinate assembly and preparation of materials re same (1.1).
8/26/2003	Seth B Kutnick	2.20	Continue to prepare Pearson document production.
8/26/2003	Gary M Vogt	0.40	Office conference to discuss issues re response to Hawkins, Pearson and Gauthier production requests.
8/26/2003	James W Kapp	2.70	Revise debtor's responses to Pearson's first set of interrogatories, admissions and document requests.
8/27/2003	Ross M Kwasteniet	3.90	Draft answers to Pearson and Hawkins discovery requests.

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/27/2003	Claude W Irmis	2.20	Coordinate organization of Exide email diligence review (1.1); retrieve and distribute R2 first and second document production requests (.2); continue to assemble and organize Gauthier, Hawkins, Pearson diligence materials (.9).
8/27/2003	Gary M Vogt	1.70	Coordinate assembly and preparation of materials to be produced in response to Hawkins, Pearson and Gauthier production requests.
8/28/2003	Adam J Gorman	0.90	Document production of key D&O adversary documents.
8/28/2003	Ross M Kwasteniet	3.20	Revise responses to Pearson and Hawkins discovery requests.
8/28/2003	Claude W Irmis	1.10	Coordinate email document production response re perpetration company emails.
8/28/2003	Gary M Vogt	0.90	Coordinate assembly and preparation of additional materials to be produced in response to Hawkins, Pearson and Gauthier production requests (.9).
8/28/2003	James W Kapp	0.20	Develop response to Hawkins discovery.
8/29/2003	Adam J Gorman	0.40	Update D&O adversary pleadings.
8/29/2003	Shannon Roberts	1.00	Office conference with G. Vogt re Exide production.
8/29/2003	Gary M Vogt	1.30	Coordinate assembly and organization of materials to be produced in response to Hawkins, Pearson and Gauthier production requests.
	Total hours:	113.20	

# **MATTER 109**



**Matter 109 – Margulead, Ltd. vs. GNB Technologies – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/1/2003	Kathleen A McCallie	3.00	Research case law relevant to R. East's witness statement in support of Exide's decision against Section 68 application by Margulead.
8/4/2003	Kathleen A McCallie	4.50	Review e-mail inter-office message re costs/security issue for Margulead Section 68 opposition (.1); draft/edit letter re posting security for costs (.4); draft R. East's second witness statement in support of Exide defense against Margulead Section 68 claims (4.0).
8/4/2003	Richard C East	1.50	Draft Email E. Rossiter re Diligence (.5); draft letter to WT Costs re Skeleton Bill of Costs (.5); peruse correspondence and enclosures from WT Costs letter (.5).
8/5/2003	Kathleen A McCallie	10.30	Revise cost/security letter (.2); draft R. East's second witness statement re Margulead Section 68 claims (10.1).
8/5/2003	Richard C East	1.10	Finalise letter to WT Costs (.5); discussion K. McCallie (.1); letter to Cukier re funding (.5).
8/6/2003	Kathleen A McCallie	6.30	Draft and revise R. East's second witness statement re Margulead Section 68 claims.
8/6/2003	Richard C East	1.00	Review draft Bill of Costs (.5); office conference re same (.5).
8/7/2003	Kathleen A McCallie	7.10	Review and research UK high court decisions re Section 68 appeals made by parties' appealing arbitration decisions (6.9); review and revise draft costs analysis re Section 68 appeal defense (.2).
8/7/2003	Richard C East	0.50	Email E. Rossiter re Margulead (.1); telephone call N. Weatherly from Diligence (.2); email to N. Keegan re Bill of Costs (.2).
8/8/2003	Kathleen A McCallie	5.50	Research UK appeals court decisions re Section 68 appeals from arbitration decisions for use in Exide Section 68 defense.
8/11/2003	Kathleen A McCallie	4.50	Research UK appeals re Section 68 matters going to procedure and standards used under UK Arbitration Act for evaluating arbitration appeals (1.2); revise R. East's second witness statement for Exide defense against Section 68 appeal (3.3).
8/11/2003	Richard C East	2.10	Review draft 2nd RCE statement (1.5); review draft skeleton Bill of Costs (.5); office conference re same (.1).

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/12/2003	Kathleen A McCallie	9.90	Revise R. East's second witness statement supporting Exide Section 68 defense against Margulead appeal (6.1); incorporating concepts from recent UK case law into same (3.8).
8/12/2003	Richard C East	0.40	Telephone call N. Weatherly re financial research re M.Ltd. (.2); email to E. Rossiter re same (.1); telephone call to cost drafter re draft Bill of costs (.1).
8/12/2003	Helen Bird	1.00	Case searching and contacting UK government sources to obtain DAC Report of 1989 per K. McCallie.
8/13/2003	Richard C East	4.50	Review and revise RCE statement.
8/13/2003	Helen Bird	0.50	Continuing search for DAC Report from UK Government arms.
8/14/2003	Richard C East	8.00	Redraft RCE2 (7.5); review Diligence Report (.2); telephone call N. Wetherly (.3).
8/15/2003	Richard C East	5.50	Redraft RCE 2 (4.0); telephone call H. Prichard re Diligence Report (.2); office conference re same (.1); draft update email to H. Prichard (.5); office conference re Cukier conversation (.3); research re time of filing of claims form and evidence (.2); email K. McCallie and S. Haubold re same (.2).
8/19/2003	Richard C East	1.00	Redraft RCE (.8); email and voicemail message to T. Landau re same (.1); email K. McCallie and S. Haubold re same (.1).
8/20/2003	Richard C East	1.20	Telephone call T. Landau (.1); redraft RCE 1st (.5); review diligence report (.1); email T. Landau re same (.2); amend application notice (.3).
8/26/2003	Richard C East	1.50	Review 2nd Witness Statement of G. Cukier.
8/27/2003	Kathleen A McCallie	3.40	Review and draft notes on Margulead's submissions in support of their Section 68 application (2.0); review inter-office e-mail correspondence re same (.4); inter-office conference re next steps and timing of Exide response to same (1.0).
8/27/2003	Richard C East	5.60	Review 2nd witness statement of G. Cukier (2.5); review claim form (.3); office conference re same (.3); review law relating to stifling of claims and security of costs applications (2.5).

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/28/2003	Kathleen A McCallie	2.00	Review Margulead Article 68 (appeal of arbitration decision) submissions (1.2); inter-office meeting re strategy and issues to be dealt with in Exide response to same (.8).
8/28/2003	Richard C East	4.50	Office conference re Section 68 Application (1.0); review of transcript for preparation for meeting with T. Landau (3.5).
8/29/2003	Richard C East	2.30	Review transcripts of arbitration for preparation for witness statement.
8/31/2003	Richard C East	3.00	Review Vol 2 of transcript of Arbitrations for forthcoming security and Section 68 applications.
	Total hours:	101.70	

# **MATTER 110**

**Matter 110 – Exit Financing – Fees**

<b><u>Date</u></b>	<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
8/5/2003	Matthew N Kleiman	0.50	Conduct telephone conference with counsel to potential exit lender re fee issues.
8/14/2003	Andrew M Kaufman, P.C.	2.50	Review DIP and pre-petition facility requirements for implementing reorganization steps (1.5); prepare memorandum to G. Kaufman, G. McPherson, L. Donahue, S. Kupinsky, et al., re same (1.0).
8/15/2003	Carter W Emerson, P.C.	1.00	Office conference re DM notes (.7); telephone calls with S. Kupinsky and M. Kleiman and email with Blackstone & Innisfree re bondholder lists (.3).
8/15/2003	Andrew M Kaufman, P.C.	1.50	Office conferences re exit structure and issues under pre-petition facilities.
8/18/2003	Andrew M Kaufman, P.C.	0.30	Office conference re document production.
8/19/2003	Andrew M Kaufman, P.C.	1.00	Financing: Conference with C. Emerson re post-exit organizational structure, including exit financing considerations (.5); further consideration re same (.5).
8/20/2003	Maria P Bonifacini	2.00	Review DB commitment letter (1.5); prepare for and attend telephone conference with E. Berg, David Bailey, Exide executives (.5).
8/20/2003	Carter W Emerson, P.C.	0.70	Discuss exit finance matters and information with G. McPherson and P. Bonafini (.5); calls and e-mails re getting DM note holder list (.2).
8/20/2003	Andrew M Kaufman, P.C.	3.20	Exit financing: Review and participate in conference call re proposed Deutsche Bank term sheet and commitment letters re exit financing.
8/21/2003	Stephanie S Liang	1.90	Conduct telephone conference with R. Murdock re Assignments of Government Contracts (.4); conduct telephone conference with R. Brett re Assignments of Government Contracts (.3); conduct telephone conference with K. Braden re exit financing issues (.5); conduct telephone conference with M. Israel re exit financing issues (.2); office conference re exit financing issues (.4); correspond with C. Spraggs re Exide Canada Asset Sale.
8/21/2003	Maria P Bonifacini	2.50	Review DB Commitment letter, credit facilities, term sheet and fee letter.

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/22/2003	Stephanie S Liang	1.20	Correspond with T. Tingley and C. Fletcher re Assignments of Government Contracts (.2); conduct telephone conference with K. Braden re Exide issues (.3); correspond with M. Israel re exit financing issues (.3); correspond with A. Kaufman re exit financing issues (.4).
8/22/2003	Carter W Emerson, P.C.	1.70	Review and mark up DB commitment letter (1.5); work on list of action items for restructuring (.2)
8/26/2003	Andrew M Kaufman, P.C.	1.00	Review revised commitment letter re exit financing.
8/28/2003	Stephanie S Liang	1.90	Conduct telephone conference with K. Braden re Exit Facility (.5); correspond with A. Kaufman and R. Ellis re document request (.2); correspond with P. Guimaraes re SPAT transactions (.2); conduct activities in connection with the Assignments of Government Contracts (1.0).
Total hours:		22.90	