

Wildman, Harrold, Allen & Dixon
225 West Wacker Drive
Chicago, Illinois 60606-1229
312-201-2000
312-201-2555 fax
www.wildmanharrold.com



Wildman Harrold
Attorneys and Counselors

Anthony G. Hopp
312-201-2537
hopp@wildmanharrold.com

September 16, 2003

David P. Cooke, Esq.
Honeywell International Inc.
P.O. Box 2245R
101 Columbia Road
Morristown, NJ 07962

Re: *Devane, et al. v. The Lockformer Company, et al.*
Pelzer v. The Lockformer Company, et al.
Mejdrech, et al. v. The Lockformer Company, et al.
Meyer, et al. v. The Lockformer Company, et al.
Wroble v. The Lockformer Company, et al.
Schreiber v. The Lockformer Company, et al.
Hallmer v. The Lockformer Company, et al.
Ehrhart v. The Lockformer Company, et al.

Dear Dave:

Enclosed please find this firm's invoices in the above-captioned matters for professional services rendered through August 31, 2003. Please note that the invoices reflect prior balances due.

I have also sent copies of these invoices to Ann McClure, but my partners and I would appreciate it if Honeywell would process these, and would assert claims in these amounts against Lockformer in the pending bankruptcy action. Thank you once again for your attention to this matter.

Very truly yours,

WILDMAN, HARROLD, ALLEN & DIXON LLP

Anthony G. Hopp

AGH:kma
Enclosures

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Attorneys and Counselors

Anthony G. Hopp
312-201-2537
hopp@wildmanharrold.com

September 16, 2003

Ann McClure, Esq.
Mestek, Inc.
260 N. Elm Street
Westfield, MA 01085

Re: *Devane, et al. v. The Lockformer Company, et al.*
Pelzer v. The Lockformer Company, et al.
Mejdrech, et al. v. The Lockformer Company, et al.
Meyer, et al. v. The Lockformer Company, et al.
Wroble v. The Lockformer Company, et al.
Schreiber v. The Lockformer Company, et al.
Hallmer v. The Lockformer Company, et al.
Ehrhart v. The Lockformer Company, et al.

Dear Ann:

Enclosed please find this firm's invoices in the above-captioned matters for professional services rendered through August 31, 2003. Please note that the invoices reflect prior balances due. I would appreciate your immediate attention to these matters.

Very truly yours,

WILDMAN, HARROLD, ALLEN & DIXON LLP

Anthony G. Hopp

AGH:kma
Enclosures

WILDMAN, HARROLD, ALLEN & DIXON LLP

225 West Wacker Drive, Chicago, Illinois 60606-1229

Tax ID. No. 36-2615899

SEPTEMBER 15, 2003
INVOICE NO. 238940

ANN McCLURE, ESQ.
MESTEK, INC.
260 N. ELM STREET
WESTFIELD, MA 01085

FILE NO. A3374.00096

IN THE MATTER OF:

JEANETTE DEVANE ET AL V THE LOCKFORMER COMPANY
ET AL

INTERIM STATEMENT FOR PROFESSIONAL SERVICES RENDERED THROUGH AUGUST 31, 2003

DATE	NAME	HOURS	DESCRIPTION
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'01/03	MRM	1.50	Remove files to mezzanine for incorporation into caseroom files; replace research materials and pleadings volumes to files; conference with T. Bernal re: pleadings
08/01/03	HRH	0.75	Review of EPA correspondence and telephone conference with Mr. Hopp regarding response.
08/04/03	MRM	0.50	File additional working materials received from A. Hopp
08/04/03	HRH	0.75	Draft response to EPA.
08/05/03	MRM	2.00	Moving and assembling files on mezzanine; file Hirsch medical records, prior testimony and depositions; organize additional research files for restoration into office/mezzanine files.
08/05/03	HRH	1.25	Review of closing regarding correspondence from EPA and conference with Mr. Hopp regarding reply.
08/06/03	MRM	1.25	Update Summation transcript data with newly received final discs
./06/03	HRH	1.25	Revise draft of EPA response and review closing regarding same.

WILDMAN, HARROLD, ALLEN & DIXON LLP

FRANETTE DEVANE ET AL V THE LOCKFORMER COMPANY
 FILE NO. A3374.00096

SEPTEMBER 15, 2003
 INVOICE NO. 238940
 PAGE 2

DATE	NAME	HOURS	DESCRIPTION
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08/08/03	MRM	1.25	File Clayton Group, J. Connor and other expert materials; file defense exhibits
08/11/03	JFM	1.50	Evaluated post trial motion and prepared comments to same.
08/11/03	HRH	1.25	Correspondence with EPA regarding closing arguments; telephone conference with client regarding same.
08/14/03	MRM	0.50	Research Summation to locate and copy closing arguments for review by R. Heard.
08/18/03	MRM	2.75	Compile and organize all pleadings into chronological order for binding; conference with L. Petrowski re: assistance with checking for duplicates and missing documents; file expert reports, correspondence, research and depositions
08/18/03	JFM	0.50	Analyze results of jury poll.
08/19/03	LLP	0.50	Assist M. McCarl with revisions to pleading files.
08/21/03	LLP	0.75	Assist M. McCarl with revisions to pleadings files.
08/21/03	MRM	2.00	Conferences with L. Petrowski re: restructuring pleadings binders; assist with rebuilding pleadings binders
08/22/03	LLP	3.50	Assist M. McCarl with revisions to pleading files.
08/25/03	MRM	0.50	File trial transcripts and expert research
		24.25	TOTAL HOURS

SUMMARY OF PROFESSIONAL SERVICES RENDERED:

LEANORA L. PETROWSKI	4.75	hours at	\$125.00 =	593.75
MARK R. MCCARL	12.25	hours at	\$130.00 =	1,592.50
JOSEPH F. MADONIA	2.00	hours at	\$330.00 =	660.00
H. RODERIC HEARD	5.25	hours at	\$430.00 =	2,257.50

WILDMAN, HARROLD, ALLEN & DIXON LLP

JEANETTE DEVANE ET AL V THE LOCKFORMER COMPANY
FILE NO. A3374.00096

SEPTEMBER 15, 2003
INVOICE NO. 238940
PAGE 3

CURRENT FEES

5,103.75

DISBURSEMENTS INCURRED:

OVERNIGHT DELIVERY	14.08
DINNER MEETING FOR TRIAL TEAM 7/1/03 - ANTHONY G. HOPP	57.21
DINNER MEETING FOR TRIAL TEAM 7/7/03 - ANTHONY G. HOPP	71.31
DINNER MEETING FOR TRIAL TEAM 7/2/03 - ANTHONY G. HOPP	129.71
DINNER MEETING FOR TRIAL TEAM 7/9/03 - ANTHONY G. HOPP	129.71
LUNCH MEETING FOR TRIAL TEAM 7/11/03 - ANTHONY G. HOPP	22.03
STRAIGHTLINE COURIER-MSGR SERV. 6/20/03	44.82
STRAIGHTLINE COURIER-MSGR SERV. 7/11/03	75.00
MILEAGE, TOLLS-6/28/03 NANCE INTERVIEW - LEO P. DOMBROWSKI	23.30
REPRODUCTION EXPENSE (587 PAGES @ \$.10 PER PAGE)	58.70
REPRODUCTION EXPENSE (6 PAGES @ \$.10 PER PAGE)	.60
REPRODUCTION EXPENSE (1 PAGE @ \$.10 PER PAGE)	.10
REPRODUCTION EXPENSE (8 PAGES @ \$.10 PER PAGE)	.80
REPRODUCTION EXPENSE (3 PAGES @ \$.10 PER PAGE)	.30
REPRODUCTION EXPENSE (314 PAGES @ \$.10 PER PAGE)	31.40
TRAVEL EXPENSE AUTOMOBILE/TRIAL FROM 6/23 THROUGH 7/11/03 - MARK MCCARL	2,067.35
TRIAL EXPENSES 1/28-5/29/03- H. RODERIC HEARD	3,008.60

CURRENT DISBURSEMENTS

5,735.02

CURRENT FEES AND DISBURSEMENTS

10,838.77

WILDMAN, HARROLD, ALLEN & DIXON LLP

HEANETTE DEVANE ET AL V THE LOCKFORMER COMPANY
FILE NO. A3374.00096

SEPTEMBER 15, 2003
INVOICE NO. 238940
PAGE 4

OUTSTANDING INVOICES

06/19/03	231710	76608.54
07/21/03	234017	231544.94
08/14/03	236225	157149.05

PRIOR BALANCE DUE	465,302.53
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TOTAL BALANCE DUE	476,141.30
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PLEASE INCLUDE YOUR REMITTANCE ADVICE WITH YOUR PAYMENT

UNPAID BALANCES ARE SUBJECT TO A 1% PER MONTH SERVICE CHARGE
AFTER 30 DAYS FROM BILLING DATE

WILDMAN, HARROLD, ALLEN & DIXON LLP

225 West Wacker Drive, Chicago, Illinois 60606-1229

Tax ID. No. 36-2615899

REMITTANCE ADVICE

ANN McCLURE, ESQ.
MESTEK, INC.
260 N. ELM STREET
WESTFIELD, MA 01085

SEPTEMBER 15, 2003

INVOICE NO. 238940

FILE NO. A3374.00096

IN THE MATTER OF:

JEANETTE DEVANE ET AL V THE LOCKFORMER COMPANY

CURRENT FEES AND DISBURSEMENTS

10,838.77

OUTSTANDING INVOICES

06/19/03	231710	76608.54
07/21/03	234017	231544.94
08/14/03	236225	157149.05

PRIOR BALANCE DUE

465,302.53

TOTAL BALANCE DUE

476,141.30

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PLEASE RETURN THIS SHEET WITH PAYMENT

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ANN McCLURE, ESQ.
MESTEK, INC.
260 N. ELM STREET
WESTFIELD, MA 01085

SEPTEMBER 15, 2003
INVOICE NO. 238941

FILE NO. A3374.00099

IN THE MATTER OF:

DANIEL PELZER AND SALLY PEPPING V LOCKFORMER
COMPANY ET AL

INTERIM STATEMENT FOR PROFESSIONAL SERVICES RENDERED THROUGH AUGUST 31, 2003

DATE	NAME	HOURS	DESCRIPTION
/05/03	MRM	0.50	File depositions and medical records
08/05/03	CEC	1.90	Review depositions from Dr. Hirsch pertaining to Ms. Pepping and Mr. Pelzer and from Ms. Pepping and Mr. Pelzer regarding their visit to Dr. Hirsch.
08/05/03	AGH	1.00	Further revisions to Daubert motion; discuss same with Mr. Clark.
08/06/03	CEC	1.20	Draft and edit memorandum of law to exclude Dr. Hirsch from testifying at trial.
08/07/03	CEC	1.40	Draft motion in limine to exclude Dr. Hirsch; edit and revise memorandum of law to exclude Dr. Hirsch from testifying.
08/07/03	AGH	1.00	Review and revise proposed Daubert motion; follow up with Mr. John Duffy regarding proposed summary judgment motion.
08/13/03	MRM	1.00	File correspondence and discovery records; conferences with T. Bernal re: pleadings
08/14/03	MRM	1.50	Load K. Gray depositions Vols. 2 and 3 into Summation; blaze transcripts; call to court reporter to obtain copy of Vol. 1 disc (omitted from original transcript)

WILDMAN, HARROLD, ALLEN & DIXON LLP

ANIEL PELZER AND SALLY PEPPING V LOCKFORMER
 FILE NO. A3374.00099

SEPTEMBER 15, 2003
 INVOICE NO. 238941
 PAGE 2

DATE	NAME	HOURS	DESCRIPTION
08/15/03	CEC	0.30	Edit and revise Dr. England's affidavit; meet with Mr. Hopp to discuss affidavit and Dr. England's disclosure.
08/19/03	MRM	1.50	Review files returned by T. Bernal for inclusion in correspondence, research, and pleadings records; segregate discovery materials
08/20/03	MRM	0.50	Load K. Gray deposition into Summation; blaze and index transcript
08/21/03	CEC	0.30	Review and finalize Dr. England's Rule 26 report.
08/22/03	CEC	1.50	Review and prepare exhibits for motion to bar Dr. Hirsch; review motion and memorandum for same; file same.
08/27/03	MRM	0.50	Update discovery records and consolidate all research files; file correspondence
08/27/03	JFM	2.50	Prepare various materials for upcoming hearing with Judge Zagel; telephone conference with Mr. Connor concerning preparation of his expert opinions or supplementation of his report; evaluate report of Dr. Gray to determine need for potential rebuttal testimony.
08/28/03	JFM	2.00	Attend hearing in front of Judge Zagel and discuss results of same with Mr. Connor; evaluate strategy for summary judgment motion in light of Judge Zagel's comments.
		<u>18.60</u>	TOTAL HOURS

SUMMARY OF PROFESSIONAL SERVICES RENDERED:

MARK R. MCCARL	5.50	hours at	\$130.00 =	715.00
CHAD E. CLARK	6.60	hours at	\$190.00 =	1,254.00
JOSEPH F. MADONIA	4.50	hours at	\$330.00 =	1,485.00
ANTHONY G. HOPP	2.00	hours at	\$335.00 =	670.00

WILDMAN, HARROLD, ALLEN & DIXON LLP

ANIEL PELZER AND SALLY PEPPING V LOCKFORMER
FILE NO. A3374.00099

SEPTEMBER 15, 2003
INVOICE NO. 238941
PAGE 3

CURRENT FEES

4,124.00

DISBURSEMENTS INCURRED:

CAB FARE TO/FROM DEPOSITION-6/18/03 - LEO P. DOMBROWSKI	11.00
CAB FARE TO/FROM DEPOSITION-7/15/03 - LEO P. DOMBROWSKI	10.00
REPRODUCTION EXPENSE (408 PAGES @ \$.10 PER PAGE)	40.80

CURRENT DISBURSEMENTS

61.80

CURRENT FEES AND DISBURSEMENTS

4,185.80

OUTSTANDING INVOICES

06/19/03	231702	19399.31
07/21/03	234018	10730.91
08/14/03	236227	12824.15

PRIOR BALANCE DUE

42,954.37

TOTAL BALANCE DUE

47,140.17
=====

PLEASE INCLUDE YOUR REMITTANCE ADVICE WITH YOUR PAYMENT

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Tax ID. No. 36-2615899

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MESTEK, INC.
260 N. ELM STREET
WESTFIELD, MA 01085

SEPTEMBER 15, 2003

INVOICE NO. 238941

FILE NO. A3374.00099

IN THE MATTER OF:

DANIEL PELZER AND SALLY PEPPING V LOCKFORMER

CURRENT FEES AND DISBURSEMENTS

4,185.80

OUTSTANDING INVOICES

06/19/03	231702	19399.31
07/21/03	234018	10730.91
08/14/03	236227	12824.15

PRIOR BALANCE DUE

42,954.37

TOTAL BALANCE DUE

47,140.17

=====

PLEASE RETURN THIS SHEET WITH PAYMENT

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225 West Wacker Drive, Chicago, Illinois 60606-1229

Tax ID. No. 36-2615899

SEPTEMBER 15, 2003
INVOICE NO. 238947

ANN McCLURE, ESQ.
MESTEK, INC.
260 N. ELM STREET
WESTFIELD, MA 01085

FILE NO. A3374.00100

IN THE MATTER OF:

THERESA MEJDRECH, DANIEL MEJDRECH, MARY
BENO, MARK BENO V THE LOCKFORMER COMPANY
ET AL HONEYWELL MATTER NUMBER 018936

INTERIM STATEMENT FOR PROFESSIONAL SERVICES RENDERED THROUGH AUGUST 31, 2003

DATE	NAME	HOURS	DESCRIPTION
07/01/03	MRM	5.00	Research pleadings to identify all LeClerq summary judgment papers for review by J. McGinness; research pleadings to locate and copy all motions in limine for review by P. Freeborn; conferences with A. Hopp and C. Clark re: motions in limine; return all originals to files
08/01/03	PKF	2.00	Legal research of Illinois law regarding whether plaintiffs can bar Honeywell from contesting liability based on theory of offensive collateral estoppel.
08/01/03	CEC	1.50	Meet with Mr. Hopp to discuss the possibility of decertification of class; review case pertaining to decertification; meet with Mr. Madonia to discuss motion for summary judgment.
08/01/03	ACC	0.20	Meet with C. Clark to discuss decertification research and its application to instant case; discuss Bentley below-MCL argument and its application to the case.

WILDMAN, HARROLD, ALLEN & DIXON LLP

THERESA MEJDRECH, DANIEL MEJDRECH, MARY
LE NO. A3374.00100

SEPTEMBER 15, 2003
INVOICE NO. 238947
PAGE 2

DATE	NAME	HOURS	DESCRIPTION
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08/01/03	JFM	3.00	Evaluate expert report of John Connor; telephone conference with Mr. Connor to discuss strategy for expert report; researched various potential summary judgment issues and discussed same with Chad Clark.
08/01/03	AGH	5.00	Telephone conferences with Mr. Ed Manzke regarding deposition scheduling; draft letter to Mr. Manzke regarding same; receive and review several letters from Mr. Manzke regarding deposition scheduling; follow up with Donohue, Brown regarding same; follow up with former Honeywell employees regarding Rule 30(b)(6) deposition; discussion with Mr. Madonia regarding TCE timeline and incorporation of same into Dr. Connor's expert report; review timeline in reference materials; forward same to Dr. Connor.
08/01/03	HRH	0.75	Review of correspondence regarding Mandamus and telephone conference with Mr. Madonia regarding same.
08/04/03	MRM	4.50	Research Summation to locate and print Romano transcript for review by L. Dombrowski; research Devane pleadings to assemble collection of all motions in limine for review by P. Freeborn; copy all Devane motions in limine; research pleadings to locate and copy all complaints for review by P. Freeborn; restore additional LeClerq materials to mezzanine files
08/04/03	PKF	2.80	Review plaintiffs' amended class action complaint in preparation for drafting motions in limine; review motions in limine filed in LeClercq case; review motions in limine filed in Devane case; legal research of Illinois law regarding whether doctrine of defensive collateral estoppel precludes plaintiffs from litigating issue of punitive damages at trial.

WILDMAN, HARROLD, ALLEN & DIXON LLP

TERESA MEJDRECH, DANIEL MEJDRECH, MARY
LE NO. A3374.00100

SEPTEMBER 15, 2003
INVOICE NO. 238947
PAGE 3

DATE	NAME	HOURS	DESCRIPTION
08/04/03	JKM	5.25	Review plaintiffs' motion for partial summary judgment as to the source of TCE, statement of undisputed facts and exhibits in support thereof; review expert report of Dr. Ball attached in support of plaintiffs' motion for partial summary judgment; begin drafting a response to plaintiffs' statement of undisputed material facts.
08/04/03	CEC	2.10	Research and review case law pertaining to Honeywell's duty to warn neighbors of possible contamination from Lockformer site.
08/04/03	JFM	12.00	Drafted various modifications to expert report of John Connor and discussed same with Mr. Connor in lengthy meeting.
08/04/03	HRH	1.25	Review of Mandamus issues.
08/05/03	MRM	4.00	File all LeClerq and Devane research materials received from C. Clark (pleadings/correspondence/depositions); restore all LeClerq materials to mezzanine files; research files to locate and copy J. England reports for review by A. Hopp; assist C. Clark with Summation research re: Devane trial transcripts
08/05/03	PKF	7.30	Conference with Mr. Hopp regarding Honeywell's motions in limine; review Honeywell's motion to modify case management order, plaintiffs' memorandum in opposition to Honeywell's motion to modify case management order, Honeywell's response to plaintiffs' memorandum, and order granting plaintiffs' motion to certify the classes in preparation for drafting motion in limine to bar evidence of damages at trial; draft motion in limine to bar evidence of damages at trial; draft motion in limine to bar reference to either LeClerq case or Devane case at trial.

WILDMAN, HARROLD, ALLEN & DIXON LLP

TERESA MEJDRECH, DANIEL MEJDRECH, MARY
FILE NO. A3374.00100

SEPTEMBER 15, 2003
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PAGE 4

DATE	NAME	HOURS	DESCRIPTION
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08/05/03	CEC	3.30	Review case law pertaining to duty to warn, draft and edit statement of facts for motion for summary judgment; review report of Dr. Ball pertaining to alleged contamination.
08/05/03	JKM	6.20	Review file and documents for continued drafting of response to plaintiffs' statement of undisputed material facts; review defendant's expert reports of John Connor and Dr. Sturchio in preparation for drafting statement of additional undisputed material facts requiring the denial of plaintiffs' motion for partial summary judgment; begin drafting statement of additional undisputed material facts requiring the denial of plaintiffs' motion for partial summary judgment based upon review of the same.
08/05/03	LPD	2.75	Prepare petition for mandamus; examine case law to determine standards for obtaining mandamus when district court fails to follow direction of appellate court.
08/05/03	JFM	5.00	Completed analysis of John Connor expert report; office conferences with Mr. Hopp and Mr. Heard concerning strategy for various motions; evaluated potential motions in limine; began preparation of various materials for upcoming trial; evaluate list of things to be done in preparation of final pre-trial order; conducted additional review of Neil Sturchio expert report.
08/05/03	HRH	2.50	Review of trial outlines with Mr. Madonia and Mr. Hopp; review of Mandamus issues.
08/06/03	MRM	3.25	Research files to locate motion to exclude Ozonoff and Ball testimony; copy motion; draft letter to A. Nothelfer enclosing motion; prepare labels for mailing; file pleadings and correspondence

WILDMAN, HARROLD, ALLEN & DIXON LLP

TERESA MEJDRECH, DANIEL MEJDRECH, MARY
FILE NO. A3374.00100

SEPTEMBER 15, 2003
INVOICE NO. 238947
PAGE 5

DATE	NAME	HOURS	DESCRIPTION
08/06/03	PKF	2.50	Draft motion in limine to bar evidence of stigma damages at trial; draft motion in limine to bifurcate federal and state common law claims at trial.
08/06/03	LPD	4.00	Revise petition for mandamus; examine additional case law regarding standards for same; examine transcripts of Judge Leinenweber's rulings.
08/06/03	HRH	3.50	Review of Connor issues with Mr. Madonia; review of Mandamus issues with Mr. Dombrowski; conference with Greenburg Taurig counsel regarding same; telephone conference with Mr. Hopp regarding status.
08/07/03	HXL	6.50	Review and organize documents into sets of reference binders for use by experts
08/07/03	PKF	6.00	Draft motion in limine to bar plaintiffs from introducing evidence regarding annoyance or loss of use; draft motion in limine to bar expert testimony regarding credibility of witnesses; draft motion in limine to bar evidence regarding the filing of any motions in limine; draft motion in limine to bar any evidence regarding noncompliance with discovery requests; draft motion in limine to bar plaintiffs from introducing any evidence regarding fear of future illness; draft motion in limine to bar plaintiffs from introducing any evidence regarding prior lawsuits involving any defendant.
08/07/03	JKM	7.00	Continue research and drafting response to plaintiffs' motion for summary judgment sections dealing with offensive collateral estoppel and judicial estoppel; edit/revise response to plaintiffs' statement of undisputed material facts based upon draft response to collateral estoppel and judicial estoppel arguments.
08/07/03	CEC	0.80	Edit and revise statement of facts for motion for summary judgment.

WILDMAN, HARROLD, ALLEN & DIXON LLP

TERESA MEJDRECH, DANIEL MEJDRECH, MARY
 FILE NO. A3374.00100

SEPTEMBER 15, 2003
 INVOICE NO. 238947
 PAGE 6

DATE	NAME	HOURS	DESCRIPTION
08/07/03	LPD	5.00	Revise petition for writ of mandamus; examine case law regarding granting of petitions where district court failed to follow appellate court's mandate.
08/07/03	HRH	2.75	Review of Connor Report; telephone conference with Mr. Hopp regarding status.
08/08/03	HXL	6.50	Continue review and organization of reference documents into binders for use by experts
08/08/03	MRM	1.25	File pleadings and discovery records; conference with T. Bernal re: filing categories
08/08/03	PKF	7.00	Draft motion in limine to bar plaintiffs from introducing any evidence regarding Honeywell's out-of-state revenue; draft motion to strike plaintiffs' claim for willful and wanton conduct; revise motion in limine to bar evidence regarding plaintiffs' annoyance or loss of use; legal research of Illinois law regarding whether Devane verdict and doctrine of collateral estoppel precludes plaintiffs from seeking punitive damages from Honeywell; legal research regarding whether willful and wanton conduct constitutes independent cause of action in Illinois.
08/08/03	JKM	5.25	Review file material relating to the Ellsworth Industrial Area, St. Joseph's Creek, and the Downers Grove sanitary sewer line -- draft statement of additional facts based upon review of the same; continue drafting response to plaintiffs' motion for partial summary judgment based upon review of file and research findings as to collateral estoppel and judicial estoppel; telephone call to Shima Roy at Baker regarding issues relating to research on collateral estoppel and judicial estoppel for coordination of the same.

WILDMAN, HARROLD, ALLEN & DIXON LLP

TERESA MEJDRECH, DANIEL MEJDRECH, MARY
FILE NO. A3374.00100

SEPTEMBER 15, 2003
INVOICE NO. 238947
PAGE 7

DATE	NAME	HOURS	DESCRIPTION
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08/08/03	CEC	2.20	Meet with Mr. Dombrowski to discuss motion for protective order to clarify issues in phase I; review testimony of Dr. Ball pertaining to alleged contamination.
08/08/03	LPD	3.00	Revise petition for writ of mandamus.
08/11/03	HXL	6.25	Continue review and organization of reference documents into binders for use of experts
08/11/03	PKF	5.70	Legal research concerning whether constitutional double jeopardy clause prevents plaintiffs from seeking punitive damages even though Devane jury found Honeywell's conduct insufficient to support punitive damages; draft motion to strike plaintiffs' claims for punitive damages.
08/11/03	EAM	1.20	Legal research Illinois Federal case law regarding collateral estoppel and summary judgment motions.
08/11/03	JKM	6.25	Complete drafting response to plaintiffs' statement of undisputed material facts; complete review of Dr. Sturchio and Mr. Connor's expert reports and complete statements of additional material facts regarding the same; continue drafting response to plaintiffs' motion for partial summary judgment as to the scientific evidence establishing sources other than Lockformer.
08/11/03	CEC	0.20	Meet with Mr. Madonia to discuss motion for protective order.
08/11/03	LPD	2.50	Revise petition for mandamus; examine case law to determine whether prejudice must be shown to obtain writ where district court ignores appellate court's mandate.
08/11/03	JFM	2.00	Interviewed animation graphics company concerning their potential assistance with trial preparation; met with Baker and McKenzie to discuss various trial preparation issues.

WILDMAN, HARROLD, ALLEN & DIXON LLP

TERESA MEJDRECH, DANIEL MEJDRECH, MARY
FILE NO. A3374.00100

SEPTEMBER 15, 2003
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PAGE 8

DATE	NAME	HOURS	DESCRIPTION
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08/11/03	AGH	3.50	Prepare for and attend meeting with Mr. Rick Saines and Mr. Vince Oleszkiewicz regarding graphics and trial strategy; subsequent meeting with Mr. Madonia regarding same; follow up with Mr. Heard, Mr. Dombrowski and Mr. David Cooke regarding Mandames action; follow up with Mr. McGinness regarding response to motion for summary judgment; receive and review correspondence relating to Dr. Sturcchio.
08/11/03	HRH	2.25	Review of expert's reports and conference with Mr. Madonia; telephone conference with client regarding status; review of trial issues with Messrs. Hopp and Madonia.
08/12/03	HXL	2.50	Review and organization of reference documents into sets of binders for use of experts
08/12/03	MRM	4.00	File pleadings; conferences with T. Bernal re: pleadings; research Summation to locate references in Teitelbaum depositions to Anderson case; review all research findings; transfer research results to Word format; draft email to A. Hopp attaching Word document
08/12/03	EAM	1.50	Legal research Illinois Federal case law regarding collateral estoppel and summary judgment motions; conference with Mr. McGinness regarding same.
08/12/03	PKF	6.50	Legal research of Illinois law regarding whether punitive damages may be awarded in the absence of any compensatory damages; legal research of Illinois law concerning the legal standard for awarding punitive damages; legal research concerning whether punitive damages are available in an action alleging only damage to real property; revise motion to strike punitive damages claim.
8/12/03	CEC	1.00	Research and review case law pertaining to hearings on punitive damages.

WILDMAN, HARROLD, ALLEN & DIXON LLP

TERESA MEJDRECH, DANIEL MEJDRECH, MARY
FILE NO. A3374.00100

SEPTEMBER 15, 2003
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DATE	NAME	HOURS	DESCRIPTION
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08/12/03	JKM	6.25	Continue drafting and revising (1) Defendants' Consolidated Response to Plaintiffs' Focused Motion for Summary Judgment, (2) Defendants' Response to Plaintiffs' Statement of Undisputed Material Facts, (3) Defendants' Statement of Additional Undisputed Material Facts, and (4) Motion to Strike Plaintiffs' Statement of Undisputed Material Facts; review Daubert Motion to Bar Opinions of Dr. Sturchio.
08/12/03	LPD	3.75	Revise response to plaintiffs' statement of facts; revise statement of additional facts; examine plaintiffs' motion and memorandum in support to bar Dr. Sturchio; revise petition for writ of mandamus; examine and revise response to motion for partial summary judgment.
08/12/03	JFM	2.50	Evaluated and drafted modifications to summary judgment brief.
08/12/03	AGH	1.00	Additional revisions to response to summary judgment motion.
08/12/03	HRH	2.50	Attention to Mandamus; telephone conferences client regarding 8/14 meeting; review of outline for client meeting.
08/13/03	MRM	4.00	Prepare MEJ document production for copying- place all documents into files, label all redwelds; conference with Aloha Doc. Svcs. re: duplication of files in preparation for scanning and coding; conference with Prism re: scanning/imaging/coding prowl- meet with D. Thomas and review documents; specify and discuss various fields for capture; discuss timeframe requirements; specify requirements for employment of coders (no offshore coding); discuss and review compatibility needs for inputting data into Summation; review Summation database already created for additional locations to store data

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08/13/03	EAM	1.00	Legal research Illinois Federal case law regarding interlocutory orders and Local Rules regarding filing procedures.
08/13/03	PKF	2.50	Draft motion in limine to bar evidence related to plaintiffs' fear of illness or increased risk of future injury; draft motion in limine to bar evidence related to plaintiffs' emotional distress.
08/13/03	JKM	5.25	Continue drafting and revising (1) Defendants' Consolidated Response to Plaintiffs' Focused Motion for Summary Judgment, (2) Defendants' Response to Plaintiffs' Statements of Undisputed Material Facts, (3) Defendants' Statement of Additional Undisputed Material Facts, and (4) Motion to Strike Plaintiffs' Statement of Undisputed Material Facts; draft motion for leave to exceed the page limit on our Response to Plaintiffs' Motion For Partial Summary Judgment.
08/13/03	LPD	9.50	Appear before Judge Leinenweber on plaintiffs' motion to bar Dr. Sturchio; briefing schedule set; examine transcript of July 30, 2003 hearing on motion to reconsider; revise petition for mandamus; prepare motion for stay; transmit petition to co-counsel for review; examine additional case law regarding appellate court ordering district court to comply with mandate.
08/13/03	JFM	5.50	Performed more in depth analysis of Sturchio report and evaluated strategy for response to plaintiffs' Daubert motion; evaluated plaintiffs' Daubert motion; began working on status report for upcoming meeting with Mr. Cooke; telephone conference with Mr. Connor concerning potential trial testimony and trial preparation; prepared various materials for upcoming trial, evaluated brief in support of mandamus petition.

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08/13/03	AGH	3.00	Revise, edit and rewrite portions of response to summary judgment brief; conferences with Mr. McGinness and Mr. Saines regarding same; follow up with Sheema Roy, of Baker & McKenzie, regarding same.
08/13/03	HRH	2.25	Preparation for meeting with Mr. Cooke and Ms. Adams regarding status; review and revise Mandamus petition.
08/14/03	MRM	3.75	Research files to locate and copy amended complaint for review by Clark; load Sturchio deposition into Summation; blaze transcript; research files to locate and copy Sturchio expert report for review by J. McGinness; research files to locate Komperda deposition for review by J. McGinness; conference with D. Thomas (Prism) to complete document preparations for scanning/imaging/coding- describe and review unitizing requirements; deliver document productions to commence imaging process; file pleadings.
08/14/03	PKF	5.80	Revise Defendants' Motions in Limine to bar evidence of damages, punitive damages, annoyance or loss of use, willful and wanton conduct, and emotional distress at trial; conference with Mr. Hopp concerning same.
08/14/03	JKM	6.25	Complete and file with Mr. Saines, including coordination of exhibits (1) Defendants' Consolidated Response to Plaintiffs' Focused Motion for Summary Judgment, (2) Defendants' Response to Plaintiffs' Statements of Undisputed Material Facts, (3) Defendants' Statement of Additional Undisputed Material Facts, (4) Motion to Strike Plaintiffs' Statement of Undisputed Material Facts, and (5) Motion for leave to exceed the page limit.

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08/14/03	CEC	9.40	Research and review case law pertaining to plaintiffs' RCRA claims; draft and edit motion for summary judgment on plaintiffs' RCRA claims.
08/14/03	LPD	0.50	Various telephone conferences with Mestek and Met-Coil attorneys regarding revisions to petition for mandamus.
08/14/03	JFM	3.50	Evaluated mandamus brief and proposed modifications to same; evaluated summary judgment motion and proposed modifications to same; telephone conference with Mr. Dombrowski concerning summary judgment motion; lengthy telephone conference with Mr. Saines concerning Daubert motion and summary judgment motion; telephone conferences with Mr. Hopp and Mr. Dombrowski concerning Daubert issues and development of various problems with expert report of Dr. Sturchio.
08/14/03	AGH	2.00	Additional revisions to response to summary judgment motion; follow up with Mr. Saines and Mr. McGinness regarding same.
08/14/03	HRH	9.50	Travel to NJ for meeting with Ms. Adams and Mr. Cooke; meeting regarding status; return travel to Chicago.
08/15/03	MRM	3.50	File pleadings; file discovery records; file research materials; file expert reports; run additional searches in Summation to identify terms in Teitelbaum depositions
08/15/03	PKF	1.50	Revise Honeywell's Motion in Limine to bar evidence of out-of-state revenue at trial; revise Defendants' Motion in Limine to bifurcate state common law claims and federal statutory claims.
08/15/03	CEC	1.00	Edit and revise memorandum of law in support of motion for summary judgment.

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08/15/03	LPD	5.00	Revise petition for mandamus; examine additional case law regarding standards for granting same.
08/15/03	AGH	1.00	Review Devane jury research; forward same to Mr. David Cooke; telephone conference with Mr. Heard regarding recent developments and trial preparation.
08/18/03	MRM	4.00	Begin assembling file in preparation for trial; check all depositions for proper loading into Summation; review pleadings and arrange for assistance with updating file and checking for duplications and missing documents; inventory all research materials; assemble additional LeClerq material expected to be needed for trial; conference with Prism re: status of coding/scanning project.
08/18/03	CEC	1.90	Review and analysis case law regarding timing of deciding punitive damages in a bifurcated trial.
08/18/03	JFM	4.00	Evaluate mandamus brief and draft same; telephone conferences with counsel for Met-Coil concerning mandamus brief; telephone conference with Mr. Cooke concerning status of mandamus action; evaluate summary judgment brief and prepare modifications to same; telephone conference with Mr. Connor in preparation for his upcoming deposition.
08/18/03	HRH	0.50	Telephone conference with Mr. Madonia regarding status.
08/19/03	MRM	3.50	Continue assembling documents for trial; conferences with clerk re: maintenance and updating of pleadings file; conference with A. Nothelfer re: obtaining copies of missing pleadings; draft email to A. Nothelfer re: missing pleadings; research files to locate and assemble Lockformer collection of LeClerq exhibits; research files to locate exhibits used by plaintiffs in LeClerq file; update discovery binders

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			and conferences with C. Clark re: filing needs
08/19/03	CEC	2.20	Draft, edit, and revise statement of facts for defendants' motion for partial summary judgment.
08/19/03	JWY	0.25	(Lockformer) Voice mails with Joe Madonia regarding imminent bankruptcy filing.
08/19/03	JFM	5.00	Continue analysis and modification of summary judgment motion; continue analysis and modification of mandamus petition.
08/19/03	HRH	0.50	Telephone conference with Mr. Madonia regarding status.
08/20/03	MRM	3.25	Research files to locate and copy pleadings and expert reports for inclusion with court filing submitted by J. Madonia; conferences with L. Dema re: exhibits
08/20/03	CEC	3.20	Draft, edit and revise motion for partial summary judgment on plaintiffs' RCRA claims and defendants' statement of facts.
08/20/03	JFM	3.50	Evaluate memorandum from Dr. Sturchio concerning retraction of one of his expert opinions; continue evaluation and modifications of mandamus petition and summary judgment motion.
08/21/03	MRM	2.75	Continue review and assembly of all pleadings binders in preparation for trial; conferences with L. Dema re: new filings and additional documents for inclusion in file
08/21/03	PKF	3.00	Review comments of Mr. Hopp regarding draft Motions in Limine; revise defendants' Motions in Limine.
08/21/03	CEC	5.80	Draft, edit, and revise defendants' motion for partial summary judgment and defendants' statement of facts; file same.