

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
) Case No. 03-12676 (MFW)  
MET-COIL SYSTEMS CORPORATION, )  
)  
Debtor. ) **Objection Date: March 29, 2004 at 4:00 p.m.**

**NOTICE OF APPLICATION**

TO: The United States Trustee for the District of Delaware, Counsel to the Debtors and all parties requesting notice under Bankruptcy Rule 2002

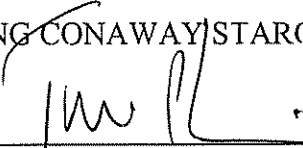
Resolutions, LLC, consultant to Eric Green, Legal Representative for Future Claimants (the "Future Claimants' Representative"), has filed its **Third Application for Compensation for Services Rendered and Reimbursement of Expenses for the Period from December 1, 2003 through December 31, 2003** (the "Application"). The Application seeks fees in the amount of \$5,100.00 and expenses in the amount of \$0.00.

Objections, if any, to the relief requested in the Application must be filed with the United States Bankruptcy Court, 824 N. Market Street, 5th Floor, Wilmington, Delaware 19801, on or before **March 29, 2004 at 4:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE THAT PURSUANT TO THE ADMINISTRATIVE ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION & REIMBURSEMENT OF EXPENSES FOR PROFESSIONALS, IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURE, THE DEBTOR WILL BE AUTHORIZED TO PAY 80% OF REQUESTED FEES AND 100% OF REQUESTED EXPENSES WITHOUT FURTHER ORDER OF THE COURT. ONLY IF AN OBJECTION IS PROPERLY AND TIMELY FILED IN ACCORDANCE WITH THE ABOVE PROCEDURE, WILL A HEARING BE HELD ON THE APPLICATION.

Dated: Wilmington, Delaware  
March 8, 2004

YOUNG CONAWAY STARGATT & TAYLOR, LLP

  
\_\_\_\_\_  
James L. Patton (No. 2202)  
Edwin J. Harron (No. 3396)  
Timothy P. Cairns (No. 4228)  
The Brandywine Building  
1000 West Street, 17<sup>th</sup> Floor  
P.O. Box 391  
Wilmington, Delaware 19899-0391  
(302) 571-6600

Counsel to Eric Green, Legal Representative for Future Claimants

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
	)	Case No. 03-12676 (MFW)
MET-COIL SYSTEMS CORPORATION,	)	
	)	
Debtor.	)	Objection Deadline: March 29, 2004 at 4:00 p.m.

**THIRD APPLICATION OF RESOLUTIONS, LLC FOR COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS CONSULTANT  
TO ERIC GREEN, LEGAL REPRESENTATIVE FOR FUTURE CLAIMANTS  
FOR THE PERIOD FROM DECEMBER 1, 2003 THROUGH DECEMBER 31, 2003**

Name of Applicant:	<u>Resolutions, LLC</u>
Authorized to Provide Professional Services to:	<u>Consultant for Legal Representative for Future Claimants</u>
Date of Retention:	<u>Order dated November 18, 2003, nunc pro tunc to October 10, 2003</u>
Period for which compensation and reimbursement is sought:	<u>December 1, 2003 through December 31, 2003</u>
Amount of Compensation sought as actual, reasonable and necessary:	<u>\$5,100.00</u>
Amount of Expense Reimbursement sought as actual, reasonable and necessary:	<u>\$0.00</u>
This is an: <input checked="" type="checkbox"/> interim <input type="checkbox"/> final application	

This application includes 0.00 hours of time with a value of \$0.00 for time incurred in connection with the preparation of interim fee applications.

Prior Applications:

			Requested		Approved	
	Date Filed	Period Covered	Fees	Expenses	Fees	Expenses
1	12/8/03	October 2003	\$12,225.00	\$0.00	\$9,780.00	\$0.00
2	1/7/04	November 2003	\$4,600.00	\$298.80	\$3,680.00	\$298.80
	<b>TOTALS</b>		<b>\$16,825.00</b>	<b>\$298.80</b>	<b>\$13,460.00</b>	<b>\$298.80</b>

**ATTACHMENT B TO FEE APPLICATION**

<b>Name of Professional Person</b>	<b>Position of the Applicant, Number of Years in that Position, Prior Relevant Experience, Year of Obtaining License to Practice, Area of Expertise</b>	<b>Hourly Billing Rate (including changes)</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Doug Allen		\$250.00	20.80	\$5,100.00
Grand Total:			20.80	\$5,100.00
Blended Rate:			\$250.00 / hour	

**COMPENSATION BY PROJECT CATEGORY**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Meetings (1008)	.70	\$1,750.00
Plan & Disclosure Statement (1012)	20.10	\$5,025.00
<b>TOTAL</b>	<b>20.80</b>	<b>\$5,100.00</b>

### EXPENSE SUMMARY

Expenses Category	Total Expenses
Computerized Legal Research	\$0.00
Delivery	\$0.00
Facsimile	\$0.00
Federal Express	\$0.00
Hotel/Lodging	\$0.00
Long Distance Telephone	\$0.00
Parking	\$0.00
Photocopy Charges (@15¢ per page)	\$0.00
Postage	\$0.00
Travel	\$0.00
Working Meals	\$0.00
<b>TOTAL</b>	<b>\$0.00</b>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: ) Chapter 11  
)  
) Case No. 03-12676 (MFW)  
MET-COIL SYSTEMS CORPORATION, )  
)  
Debtor. ) **Objection Deadline: March 29, 2004 at 4:00 p.m.**

**THIRD APPLICATION OF RESOLUTIONS, LLC  
FOR INTERIM ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Pursuant to 11 U.S.C. §§ 330 and 331 and Rule 2016 of the Federal Rules of Bankruptcy Procedure, Resolutions, LLC (hereinafter "Resolutions") hereby moves this Court for reasonable compensation for professional services rendered as consultant to Eric Green, Legal Representative for Future Claimants (the "Future Claimants' Representative") in the amount of \$5,100.00 for the period commencing December 1, 2003 through and including December 31, 2003 (the "Fee Period"). In support of its Application, Resolutions respectfully represents as follows:

1. Resolutions was employed under a general retainer to represent Eric Green as Future Claimants' Representative in connection with this chapter 11 case, pursuant to an Order dated November 18, 2003, nunc pro tunc to October 10, 2003. The Order authorized Resolutions to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

**COMPENSATION PAID AND ITS SOURCE**

2. All services for which compensation is requested by Resolutions were performed for or on behalf of Future Claimants' Representative and not on behalf of any debtor, creditor or other person.

3. During the period covered by this Application, Resolutions has received no payment and no promises for payment from any source for services rendered or to be rendered in

any capacity whatsoever in connection with these cases. There is no agreement or understanding between Resolutions and any other person, other than members of the firm, for the sharing of compensation to be received for services rendered in these cases.

4. Attached hereto as Exhibit A is a detailed statement of fees incurred during the period December 1, 2003 through December 31, 2003 showing the amount of \$5,100.00 due for fees.

#### SUMMARY OF SERVICES RENDERED

5. The professional of Resolutions who has rendered services in this case during the Fee Period is Doug Allen.

6. The services rendered by Resolutions during the Fee Period are grouped into the categories set forth in Exhibit A. The professionals who rendered services relating to each category are identified, along with the number of hours for each individual and the total compensation sought for each category, in the attachments hereto.

#### DISBURSEMENTS

7. Resolutions has incurred no out-of-pocket disbursements during the Fee Period.

#### VALUATION OF SERVICES

9. Doug Allen of Resolutions has expended a total of 20.80 hours in connection with this matter during the Fee Period.

10. The amount of time spent by Doug Allen providing services to the Future Claimants' Representative for the Fee Period is fully set forth in Exhibit A attached hereto. These are Resolutions' normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by Resolutions for the Fee Period as consultant for Future Claimants' Representative in these cases under Chapter 11 is \$5,100.00.



11. Resolutions believes that the time entries included in Exhibit A attached hereto are in compliance with the requirements of Local Rule 2016-2.

12. In accordance with the factors enumerated in 11 U.S.C. § 330, the amount requested is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

WHEREFORE, Resolutions requests that allowance be made to it in the sum of \$5,100.00 as compensation for necessary professional services rendered to the Committee for the Fee Period and further requests such other and further relief as this Court may deem just and proper.

Dated: March 6, 2003

RESOLUTIONS, LLC



Eric D. Green  
155 Federal Street  
Boston, MA 02110

Consultants to Legal Representative for Future Claimants

# Exhibit A

Met-Coil  
December 2003 - Doug Allen: Fees

Date	Activity	Description	Hours	Rate	Fees
12/08/03	012	Telephone conference call w/J Mandel, T Florence, T Cairns re status of supplemental analysis of feasibility of 524(g) trust for Met Coil.	0 70	250 00	\$175 00
12/08/03	012	Telephone conference call w/T Florence re de-brief of teleconference call concerning Met Coil trust analysis.	0 10	250 00	\$25 00
12/08/03	012	Email to E Green re summary of due diligence activities for Met Coil trust feasibility and followup discussion needed.	0 30	250 00	\$75 00
12/08/03	012	Preparation of draft briefing memo per request of E Green summarizing Met Coil case and due diligence activities conducted.	0 60	250 00	\$150 00
12/08/03	012	Review of ARPC's initial settlement model and evaluation of Exponent's revised disease list on model outcome per 12-08-03 discussions with Exponent	0 50	250 00	\$125 00
12/08/03	012	Telephone call w/J Mandel re status of Exponent's analysis on disease categories for potential 524(g) trust.	0 60	250 00	\$150 00
12/09/03	012	Telephone calls (2) with T Florence re revisions to ARPC's future claims projections	0 20	250 00	\$50 00
12/09/03	012	Review of revisions re ARPC's future claims projections for Met Coil trust.	0.20	250.00	\$50.00
12/09/03	012	Emails to/from T Cairns re postponement of disclosure statement hearing until January, 2004.	0 20	250 00	\$50 00
12/09/03	008	Meeting w/E Green re update on Met Coil due diligence activities.	0.30	250.00	\$75.00
12/10/03	012	Telephone call and followup email w/T Cairns re schedule for completion of FCR due diligence on Met Coil Trust and availability of E Green.	0 30	250 00	\$75 00
12/11/03	012	Emails (2) to/from T Cairns, YCST, re scheduling of teleconference call w/E Green concerning FCR Team due diligence on Met Coil Trust.	0 20	250 00	\$50 00
12/12/03	012	Review of final revisions to Met Coil future claimants model prepared by ARPC	0 30	250 00	\$75 00
12/12/03	008	Emails (4) to/from T Cairns, E Green, T Florence, J Malone re scheduling of teleconference for 12-14-03 to discuss final revisions to Met Coil future claimants model prepared by ARPC	0 40	250 00	\$100 00
12/14/03	012	Telephone call w/E Green and Met Coil FCR re due diligence team to discuss latest revisions to ARPC's exposure model.	1 50	250 00	\$375 00
12/15/03	012	Telephone call w/E Green and Met Coil FCR re due diligence team to discuss further revisions to ARPC's exposure model.	1 50	250 00	\$375 00
12/15/03	012	Review of further revisions (2) re ARPC's exposure model for the Met Coil trust Revisions per 12-15-03 teleconference call with FCR Team.	0 70	250 00	\$175 00
12/15/03	012	Telephone call w/E Harron re preparation of draft survey for Met Coil	0.10	250.00	\$25.00
12/15/03	012	Coordination with E Green, scheduling of 12-15-03 teleconference call, and email notifications to FCR Team to discuss final proposed numbers for Met-Coil Trust.	0 50	250 00	\$125 00
12/15/03	012	Preparation of sections re draft survey Met Coil brief for E Green	0.50	250.00	\$125.00
12/15/03	012	Review of, comment on, and coordination with multiple FCR Team contributors to Met Coil draft survey brief for E Green.	1 50	250 00	\$375 00
12/15/03	012	Teleconference call w/Met Coil FCR Team to discuss ARPC revisions to modeling scenarios for potential trust and survey brief for E Green.	1 00	250 00	\$250 00
12/16/03	012	Telephone call w/E Green re Met-Coil survey brief	0.20	250.00	\$50.00
12/16/03	012	Emails (4) to/from E Green and FCR Team re negotiation strategy for 12-20-03 meeting with Cooper concerning Cooper Industries' proposal to E Green.	0 40	250 00	\$100 00
12/17/03	012	Conducted survey of plaintiffs' attorneys re proposed Met Coil Trust per request of E Green.	4 00	250 00	\$1,000 00
12/18/03	012	Conducted survey of plaintiffs' attorneys re proposed Met Coil Trust per request of E Green.	4 00	250 00	\$1,000 00
		<b>Billing Period Totals:</b>	<b>20.80</b>		<b>\$5,200.00</b>

# Exhibit B

Met Coil  
December 2003 Expenses - Doug Allen

Date	Meals	Lodging	Airfare <sup>1</sup>	Ground Trans <sup>2</sup>	Personal Trans <sup>3</sup>	Other <sup>4</sup>	Total	Notes
	\$0.00	\$0.00		\$0.00			\$0.00	No expenses for December 2003
<b>Totals:</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	