

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

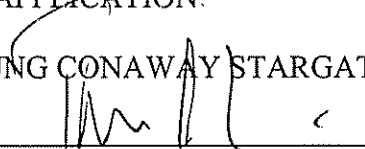
Exponent, Inc., Toxicologists and Epidemiologists to Eric Green, Legal Representative for Future Claimants (the "Future Claimants' Representative"), has filed its **Second Application for Compensation for Services Rendered and Reimbursement of Expenses for the Period from November 1, 2003 through November 30, 2003** (the "Application"). The Application seeks fees in the amount of \$21,077.50 and expenses in the amount of \$1,514.89.

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 9, 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  
)  
)  
MET-COIL SYSTEMS CORPORATION, ) Case No. 03-12676 (MFW)  
)  
)  
Debtor. ) **Objection Deadline: March 29, 2004 at 4:00 p.m.**

**SECOND APPLICATION OF EXPONENT, INC. FOR COMPENSATION  
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES  
AS TOXICOLOGISTS AND EPIDEMIOLOGISTS TO ERIC GREEN,  
LEGAL REPRESENTATIVE FOR FUTURE CLAIMANTS FOR  
THE PERIOD FROM NOVEMBER 1, 2003 THROUGH NOVEMBER 28, 2003**

Name of Applicant: Exponent

Authorized to Provide  
Professional Services to: Toxicologists and Epidemiologists for  
Legal Representative for Future Claimants

Date of Retention: Order dated November 18, 2003,  
nunc pro tunc to October 20, 2003

Period for which compensation and  
reimbursement is sought: November 1, 2003 through  
November 28, 2003

Amount of Compensation sought as  
actual, reasonable and necessary: \$31,077.50

Amount of Expense Reimbursement sought  
as actual, reasonable and necessary: \$1,514.89

This is an:  interim  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	3/09/04	10/20/03-10/31/03	\$18,007.50	\$20.00	Pending	Pending

**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>
Jeffrey Mandel	Senior Managing Scientists	\$350.00	41.70	\$12,757.50
Abby Li	Managing Scientists	\$240.00	49.00	\$11,760.00
John M. Warmerdam	Senior/Principal Scientists	\$138.00	40.00	\$5,520.00
Gregory P. Brorby	Managing Scientists	\$190.00	0.50	\$95.00
Jessica F. Greene	Senior Scientists	\$155.00	2.00	\$310.00
Sean M. Hays	Senior Scientists	\$165.00	2.00	\$330.00
Nancy Laverda	Epidemiologist	\$160.00	2.50	\$400.00
Grand Total:			137.20	\$31,077.50
Blended Rate:			\$226.51 / hour	

**COMPENSATION BY PROJECT CATEGORY**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration (1001)	18.00	\$4,370.00
Meetings (1008)	19.50	\$6,165.00
Plan and Disclosure Statement (1012)	89.20	\$18,794.20
Travel (1019)	10.50	\$1,837.50
<b>TOTAL</b>	<b>137.20</b>	<b>\$31,077.50</b>

**EXPENSE SUMMARY**

<b>Expenses Category</b>	<b>Total Expenses</b>
Travel, Lodging & Other	\$1,439.66
Meals	\$75.23
<b>TOTAL</b>	<b>\$1,514.89</b>

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

**SECOND APPLICATION OF EXPONENT  
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, Exponent, Inc. (hereinafter "Exponent") hereby moves this Court for reasonable compensation for professional services rendered as toxicologists and epidemiologists to Eric Green, Legal Representative of Future Claimants (the "Future Claimants' Representative") in the amount of \$31,007.50 together with reimbursement for actual and necessary expenses incurred in the amount of \$1,514.89 for the period commencing November 1, 2003 through and including November 28, 2003 (the "Fee Period"). In support of this Application, Exponent respectfully represents as follows:

1. Exponent 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, effective as of October 20, 2003. The Order authorized Exponent 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 Exponent 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, Exponent 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 Exponent and any other person 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 October 20, 2003 through October 31, 2003 showing the amount of \$31,077.50 due for fees.

#### SUMMARY OF SERVICES RENDERED

5. Exponent has rendered professional services in this case during the Fee Period.

6. The services rendered by Exponent during the Fee Period is grouped into the categories set forth in Exhibit A, along with the number of hours and the total compensation sought for each category, in the attachments hereto.

#### DISBURSEMENTS

7. Exponent has incurred out-of-pocket disbursements during the Fee Period in the amount of \$1,514.89. A complete review by category of the expenses incurred for the Fee Period may be found in the attachments hereto as Exhibit B.

#### VALUATION OF SERVICES

8. Exponent has expended a total of 137.20 hours in connection with this matter during the Fee Period.

9. The amount of time spent by Exponent providing services to the Future Claimants' Representative for the Fee Period is fully set forth in Exhibit A attached hereto. These are Exponent' normal hourly rates of compensation for work of this character. The reasonable



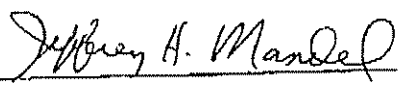
value of the services rendered by Exponent for the Fee Period as toxicologists and epidemiologists for Eric Green, Legal Representative of Future Claimants in these cases under Chapter 11 is \$31,077.50.

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

11. 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, Exponent requests that allowance be made to him in the sum of \$31,077.50 as compensation for necessary professional services rendered to the Future Claimants' Representative for the Fee Period, and the sum of \$1,514.89 for reimbursement of actual necessary costs and expenses incurred during that period, and further requests such other and further relief as this Court may deem just and proper.

Dated: March 9, 2004

  
\_\_\_\_\_

Exponent, Inc.

Toxicologists and Epidemiologists to Eric Green, Legal  
Representative for Future Claimants

# Exhibit A

Met-Coil billing details for Jeffrey H. Mandel, M.D.

<u>Date</u>	<u>Description/comment</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/3/03	0.5 hours (12) work on risk assessment with Abby Li 0.9 hours (8) conf. call with TCE team 1.8 hours (12) developing disease rates/ disease listing	3.2	\$350	1,120.00
11/4/03	0.2 hours (8) discussion with D. Allen 0.4 hours (12) disc with Tom Florence on disease listing 1.0 hours (12) work on risk assessment (John Warmerdam, A. Li)	2.6	\$350	910.00
11/5/03	0.3 hours (8) disc w Doug Allen on modeling 2.3 hours (12) development of disease listing	2.6	\$350	910.00
11/6/03	2.1 hours (12) work on risk assessment	2.1	\$350	735.00
11/7/03	0.5 hours (12) review of epidemiology with M. Kelsh 1.5 hours (12) review of risk model	2.0	\$350	700.00
11/10/03	1.48 hours (8) conf call with team 1.0 hours (12) work on risk assess	2.5	\$350	875.00
11/11/03	2.0 hours (12) review model/listing internally	2.0	\$350	700.00
11/13/03	5.0 hours travel to Boston 5.8 hours (8) meeting in Boston	5.0 5.8	\$175 \$350	875.00 2,030.00
11/14/03	4.1 hours (8) meeting in Boston 5.5 hours travel from Boston	4.1 5.5	\$350 \$175	1,435.00 962.50
11/15/03	2.0 hours (1) review of new study information	2.0	\$350	700.00
11/16/03	1.12 hours (12) complete disease listing and transfer to Jean M. 0.7 hours (8) conf call with team	1.8	\$350	630.00
11/24/03	1.5 hours (12) internal review of disease listing and process	1.5	\$350	525.00

MET-COIL LABOR DETAIL FOR ABBY LI

Date	Hours	Code	Description
11/2/03	6	1	lit review
11/3/03	1	1	review of documents from Doug and team
11/6/03	2	12	risk assessment
11/7/03	2	12	risk assessment
11/8/03	4	12	risk assessment (from 11/01) including Illinois DPH
	6	1	literature review (from 11/01)
11/9/03	5	12	risk assessment, prepare powerpoint summaries
11/10/03	2	12	risk assessment
	1	1	conference call with TCE team
11/12/03	2	12	risk assessment, summary tables
11/13/03	6	8	meeting in Boston, Resolutions
11/14/04	6	12	risk assessment including EPA discussion at ILSI on TCE
11/21/03	1	12	QC check on risk assessment
11/24/03	2	12	QC tables, IDPH discuss, presentation to Metcoil
11/25/03	1	12	QC tables, IDPH discuss, presentation to Metcoil
11/30/03	2	12	risk assessment

**JOHN WARMERDAM'S HOURS**

<u>Date</u>	<u>Description (All work performed under task 12)</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/3/2003	(12) Collect TCE concentration data from Jon Sykes.	1.3	138	179.4
	(12) Characterize nature and extent of contamination.	4.7	138	648.6
11/4/2003	(12) Analyze data and separate surface, subsurface and groundwater concentrations.	2.4	138	331.2
	(12) Calculate summary statistics for each area (LeClercq, MejdrechA, MejdrechB, and MejdrechC).	1.4	138	193.2
	(12) Calculate 95th Upper Confidence Limits of the mean for each site and media.	2.2	138	303.6
11/5/2003	(12) Finish/verify UCL calculations.	1.2	138	165.6
	(12) Research initial parameters for household exposure model.	4.8	138	662.4
11/6/2003	(12) Construct spreadsheet for household exposure calculations for adult and children.	1.9	138	262.2
	(12) Research references for input parameters.	4.1	138	565.8
11/7/2003	(12) Construct spreadsheet for outdoor soil vapor exposure.	1.6	138	220.8
	(12) Run Jury Behavior Assessment model for soil and groundwater.	2.0	138	276
	(12) Determine default assumptions and calculate flux rate based on UCL calculations.	4.4	138	607.2
11/11/2003	(12) Revise household exposure model to calculate ADD, LADD, Risk and Hazard Indices for 16 scenarios.	5.5	138	759
11/25/2003	(12) Verify all spreadsheet equations.	0.6	138	82.8
	(12) Research/cite sources for all input parameters.	1.9	138	262.2

### Met-Coil Billing Details

<u>Date</u>	<u>Category</u>	<u>Description/comment</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Amount</u>
11/1/03	(1)	Discussion w. Abby Li on context for risk assessment (Jessica Greene, Ph.D.)	2.0	\$155	\$310
11/12/03	(12)	Locating appropriate data base to determine expected morbidity rates for Lochformer site;	2.0	\$160	\$320
		Phone call discussing need/approach (Nancy Laverda)	0.5	\$160	\$ 80
11/25/03	(12)	Detailed work on TCE risk assessment model (Sean Hays)	2.0	\$165	\$330

# Exhibit B

Exponent, Inc.

Billing Backup

Project No CH10555-000 MET-COIL CONSULTATION  
Invoice No. 05938 January 12, 2004

Date	EmpNO /Acct	LabCd /Vchr	Name	Description/Comment	Hours /Qty	Rate	Billing Amount
-----							
Task. A0T0 EPIDEMIOLOGY CONSULTING							
-----							
Labor							
Principal Scientist							
11/04/03	86528	B0000	JOHN M. WARMERDAM,PHD	12-TCE calls, e-mails, UCL calcs	6.0	138.00	828.00
Sr Managing Scientist							
10/28/03	80077	B0000	JEFFREY MANDEL	0.4 (1-Abby Li), 1.8(12-dis. est.)	1.4	350.00	490.00
10/29/03	80077	B0000	MANDEL, JEFFREY	2.1(12), 1.0(12-Abby Li), 1.5(8)	4.6	350.00	1,610.00
10/30/03	80077	B0000	MANDEL, JEFFREY	1.6(12)	1.6	350.00	560.00
10/31/03	80077	B0000	MANDEL, JEFFREY	0.4(8-D.Allen), 1.3(12)	1.7	350.00	595.00
11/03/03	80077	B0000	MANDEL, JEFFREY	.5hr (12-Abby), .9hr (8), 1.8hr (12-dis. rates)	3.2	350.00	1,120.00
11/04/03	80077	B0000	MANDEL, JEFFREY	.2(8-D.Allen), 4(12-Tom F), 1.0(12-John, Abby)	2.6	350.00	910.00
11/05/03	80077	B0000	MANDEL, JEFFREY	.3(8-D.Allen), 2.3(12)	2.6	350.00	910.00
11/06/03	80077	B0000	MANDEL, JEFFREY	2.1(12-Abby, John)	2.1	350.00	735.00
11/07/03	80077	B0000	MANDEL, JEFFREY	1.5(12-model review), .5 (12-epi review)	2.0	350.00	700.00
11/10/03	80077	B0000	MANDEL, JEFFREY	1.5 H (8-conf call), 1h(12-Abby, John)	2.5	350.00	875.00
11/11/03	80077	B0000	MANDEL, JEFFREY	2h(12-review)	2.0	350.00	700.00
11/13/03	80077	B0000	MANDEL, JEFFREY	5.5 hr (8-meeting in Boston)	5.5	350.00	1,925.00
11/14/03	80077	B0000	MANDEL, JEFFREY	4.1h (meeting)	4.1	350.00	1,435.00
11/15/03	80077	B0000	MANDEL, JEFFREY	2h(12-study reviews)	2.0	350.00	700.00
11/16/03	80077	B0000	MANDEL, JEFFREY	1.12(12-form listing), 7h(8-conf call)	1.8	350.00	630.00
11/24/03	80077	B0000	MANDEL, JEFFREY	1.5h(12-disease listing review, discussion)	1.5	350.00	525.00
Managing Scientist							
11/06/03	86543	B0000	GREGORY P BRORBY	12 - Conf. call	.5	190.00	95.00
11/02/03	86622	B0000	ABBY LI	12 - work on TCE risk assessment	6.0	240.00	1,440.00
11/03/03	86622	B0000	LI, ABBY	12 - work on TCE risk assessment	1.0	240.00	240.00
11/06/03	86622	B0000	LI, ABBY	12 - work on TCE risk assessment	2.0	240.00	480.00
11/07/03	86622	B0000	LI, ABBY	12 - work on TCE risk assessment	2.0	240.00	480.00
11/08/03	86622	B0000	LI, ABBY	uncharged 11/01-cat 12 (4) cat 1 (6), IDPH	10.0	240.00	2,400.00
11/09/03	86622	B0000	LI, ABBY	cat 12 - prepare slides, risk calculations,	5.0	240.00	1,200.00
11/10/03	86622	B0000	LI, ABBY	work on TCE risk assessment	2.0	240.00	480.00
11/12/03	86622	B0000	LI, ABBY	Cat 12 2 hours	2.0	240.00	480.00
11/13/03	86622	B0000	LI, ABBY	6 hours meeting	6.0	240.00	1,440.00
11/14/03	86622	B0000	LI, ABBY	12-ILSI-AG CHEM TOX	6.0	240.00	1,440.00
11/21/03	86622	B0000	LI, ABBY	12-QC check on risk assessment	1.0	240.00	240.00
11/24/03	86622	B0000	LI, ABBY	12-QC tables, IDPH, powerpoint for metcoil	2.0	240.00	480.00
11/25/03	86622	B0000	LI, ABBY	12-QC tables, IDPH, powerpoint slides	1.0	240.00	240.00
Sr Scientist							
11/03/03	86532	B0000	JESSICA F GREENE, PhD	12-Conversion w/Abby, docs	2.0	155.00	310.00
11/25/03	86512	B0000	SEAN M. HAYS	Work on TCE risk assessment	2.0	165.00	330.00
11/03/03	86528	B0000	JOHN M. WARMERDAM, PHD	12-TCE spreadsheets, calls, e-mails	6.0	138.00	828.00
11/05/03	86528	B0000	WARMERDAM, PHD, JOHN	12-UCL calcs., MckOne model	6.0	138.00	828.00
11/06/03	86528	B0000	WARMERDAM, PHD, JOHN	12-MckOne model, child equations/refs	6.0	138.00	828.00
11/07/03	86528	B0000	WARMERDAM, PHD, JOHN	12-Soil data, Jury model and summaries	8.0	138.00	1,104.00



Billing Backup

Project No. CH10555.000 MET-COIL CONSULTATION  
Invoice No. 05938 January 12, 2004

Date	EmpNo /Acct	LabCd /Vchr	Name	Description/Comment	Hours /Qty	Rate	Billing Amount
11/11/03	86528	B0000	WARMERDAM, PhD, JOHN	12-Revise risk/HI s-sheet, 16 scenarios, QC	5.5	138.00	759.00
11/25/03	86528	B0000	WARMERDAM, PhD, JOHN	12-Revise spreadsheet eqns, research sources	2.5	138.00	345.00
11/12/03	80045	B0000	NANCY LAVERDA	12-locate info on IL cancer stats/prone, email	2.5	160.00	400.00
				Totals	135.2		32,355.00
				Total Labor			32,355.00
				Reimbursables			
11/12/03	500.35	3348989	ABBY LI	Hotel (MetCoil)			309.16
11/12/03	500.35	3348989	ABBY LI	Airfare DC to Boston			533.50
11/13/03	500.35	3348989	ABBY LI	taxi (metcoil)			17.00
11/13/03	500.35	3348989	ABBY LI	taxi (metcoil)			28.00
11/13/03	500.35	3348989	ABBY LI	taxi (metcoil)			28.00
11/13/03	500.35	3348989	ABBY LI	taxi (metcoil)			17.00
10/31/03	500.35	3348989	ABBY LI	Airfare SF to DC			507.00
11/11/03	500.36	3348989	ABBY LI	dinner			34.28
11/13/03	500.36	3348989	ABBY LI	Late Dinner			35.77
11/24/03	500.36	3348989	ABBY LI	ADJ(BCL)NOV			34.28-
11/24/03	500.36	3348989	ABBY LI	MEALS			39.46
				Total Reimbursables			1,514.89
				Total this Task			33,869.89

Task E0T0 TRAVEL TIME - @ BANKRUPTCY COURT RATES

Sr	Managing Scientist	Date	EmpNo /Acct	LabCd /Vchr	Name	Description/Comment	Hours /Qty	Rate	Billing Amount
11/13/03	80077	B0000	JEFFREY MANDEL			Travel time	5.0	175.00	875.00
11/14/03	80077	B0000	MANDEL, JEFFREY			5.5 hours travel time	5.5	175.00	962.50
11/12/03	86622	B0000	ABBY LI			Cat 8 travel to Boston from SF	6.0	120.00	720.00
11/13/03	86622	B0000	LI, ABBY			Cat 8 - travel time	6.0	120.00	720.00
						Totals	22.5		3,277.50
						Total Labor			3,277.50
						Total this Task			3,277.50
						Total this Project			37,147.39