

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 Date: November 1, 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

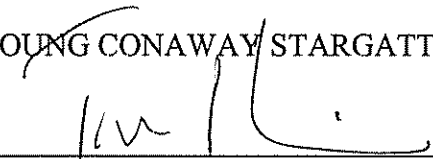
Resolutions, LLC, consultant to Eric Green, Legal Representative for Future Claimants (the "Future Claimants' Representative"), has filed its **Tenth Application for Compensation for Services Rendered and Reimbursement of Expenses for the Period from August 1, 2004 through August 31, 2004** (the "Application"). The Application seeks fees in the amount of **\$6,100.00** 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 **November 1, 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  
October 11, 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  
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) Case No. 03-12676 (MFW)  
MET-COIL SYSTEMS CORPORATION, )  
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Debtor. ) **Objection Deadline: November 1, 2004 at 4:00 p.m.**

**TENTH 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 AUGUST 1, 2004 THROUGH AUGUST 31, 2004**

Name of Applicant: Resolutions, LLC

Authorized to Provide  
Professional Services to: Consultant for Legal Representative for  
Future Claimants

Date of Retention: Order dated November 18, 2003,  
nunc pro tunc to October 10, 2003

Period for which compensation and  
reimbursement is sought: August 1, 2004 through August 31, 2004

Amount of Compensation sought as  
actual, reasonable and necessary: \$6,100.00

Amount of Expense Reimbursement sought  
as actual, reasonable and necessary: \$0.00

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	12/8/03	October 2003	\$12,225.00	\$0.00	\$9,780.00	\$0.00
2	3/08/04	November 2003	\$4,600.00	\$298.80	\$3,680.00	\$298.80
3	3/08/04	December 2003	\$5,200.00	\$0.00	\$4,160.00	\$0.00
4	3/08/04	January 2004	\$6,675.00	\$385.10	\$5,340.00	\$385.10
5	3/08/04	February 2004	\$11,750.00	\$576.90	\$11,750.00	\$576.90
6	6/02/04	March 2004	\$875.00	\$0.00	\$700.00	\$0.00
7	08/19/04	April 2004	\$1,900.00	\$0.00	\$0.00	\$0.00
8	08/19/04	May 2004	\$1,325.00	\$0.00	\$0.00	\$0.00
9	08/31/04	July 2004	\$4,025.00	\$0.00	\$0.00	\$0.00
	<b>TOTALS</b>		<b>\$48,575.00</b>	<b>\$1,260.80</b>	<b>\$35,410.00</b>	<b>\$1,260.80</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	24.40	\$6,100.00
Grand Total:			24.40	\$6,100.00
Blended Rate:			\$250.00 / hour	

**COMPENSATION BY PROJECT CATEGORY**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Plan & Disclosure Statement (1012)	24.40	\$6,100.00
<b>TOTAL</b>	<b>24.40</b>	<b>\$6,100.00</b>

### EXPENSE SUMMARY

<b>Expenses Category</b>	<b>Total Expenses</b>
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
Transportation	\$0.00
Working Meals	\$0.00
<b>TOTAL</b>	<b>\$0.00</b>

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**TENTH 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 \$6,100.00 together with reimbursement for actual and necessary expenses incurred in the amount of \$0.00 for the period commencing August 1, 2004 through and including August 31, 2004 (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 August 1, 2004 through August 31, 2004 showing the amount of \$6,100.00 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 24.40 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 \$6,100.00.

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

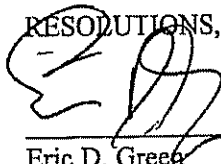


12. In accordance with the factors enumerated in 11 U.S.C. § 330, the amount requested is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other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

WHEREFORE, Resolutions requests that allowance be made to it in the sum of \$6,100.00 as compensation for necessary professional services rendered to the Future Claimants' Representative for the Fee Period, and further requests such other and further relief as this Court may deem just and proper.

Dated: October 2, 2004

RESOLUTIONS, LLC



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Eric D. Green  
222 Berkeley Street  
Suite 1060  
Boston, Massachusetts 02116

Consultants to Legal Representative for Future Claimants

# Exhibit A

Met-Coil  
August 2004 - Doug Allen: Fees

Date	Activity	Description	Hours	Rate	Fees
08/02/04	012	Review of comments from G Wingo re latest provision in Met-Coil term sheet concerning funding of TCE Trust.	0 20	250 00	\$50 00
	012	Review of insurance settlement agreements between Met-Coil, ACE, OneBeacon, Wausau and Columbia Prepared and forwarded comments to T Cairns and J. Hughes, YCST.	1 30	250 00	\$325 00
	012	Emails to E. Harron, T Florence and E Green re status of FCT Team expert final due diligence reports.	0 30	250 00	\$75 00
	012	Telephone call w/E. Harron re FCR expert's due diligence reports.	0 10	250 00	\$25 00
08/03/04	012	Reviewed and prepared comments (forwarded to YCST) on final expert reports from J F Sykes (Hydrogeology/TCE Migration), and Exponent (Risk/Epidemiology); Addressed YCST queries re outstanding issues on insurance due diligence; Emails and telephone calls to/from YCST re status of confirmation hearing, expert reports, and insurance issues; Telephone call w/J Malone, ARPC, re status of ARPC final report; Email memo to E Green re status of finalizing case file.	8 00	250 00	\$2,000 00
08/04/04	012	Review of final E Green affidavit; Review of latest draft of Met-Coil Trust term sheet and spreadsheet scenarios for collateral funding; Emails to YCST and ARPC re clarification of spreadsheet scenarios.	3 00	250 00	\$750 00
08/05/04	012	Review of revised collateral scenarios for Met-Coil Trust funding; Teleconference calls w/M Scarcella (ARPC), G Wingo (ARPC) and C Greer (YCST) re evaluation of funding scenarios and recommendation to E Green; Briefing of E Green re evaluation of revised funding scenarios; Teleconference call w/E Green and J Patton re recommendation for funding scenario; Emails to/from E Harron, C Greer, G Wingo and J Patton re collateral funding scenarios; Review of revised settlement term sheet; Review of Supplemental Affidavit of E. Green	5 00	250 00	\$1,250 00
08/06/04	012	Reviewed and prepared comments on draft final ARPC report; Reviewed supplemental affidavit of E Green; Telephone call with E Green re status of term sheet negotiations, supplemental affidavit and ARPC report; Emails and telephone call w/E Harron, G Wingo, and T Cairns re discounting issue in trust fund collateral.	4 00	250 00	\$1,000 00
08/09/04	012	Review of ARPC's final expert report and appendices re Met-Coil trust due diligence.	0 50	250 00	\$125 00
08/10/04	012	Emails and telephone calls with E Harron and T Florence re Met-Coil TCE Trust term sheet and E. Green supplemental affidavit.	0 50	250 00	\$125 00
08/11/04	012	Telephone calls & emails w/E. Harron re finalization of term sheet, supplement affidavit of E Green, and finalization of Exponent's epidemiology report; Forwarded documents to E. Green for signature.	1 00	250 00	\$250 00
08/25/04	012	Telephone call w/J. Sykes re finalizing his expert report; Email to T Cairns re same.	0 50	250 00	\$125 00
		<b>Billing Period Totals:</b>	<b>24.40</b>		<b>\$6,100.00</b>