

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: November 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

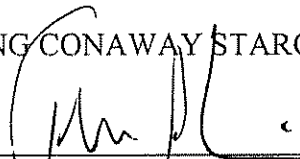
Eric Green, Legal Representative for Future Claimants (the "Future Claimants' Representative"), has filed his **Eleventh Application for Compensation for Services Rendered and Reimbursement of Expenses for the Period from September 1, 2004 through September 30, 2004** (the "Application"). The Application seeks fees in the amount of \$900.00 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 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  
November 9, 2004

YOUNG CONAWAY STARGATT & TAYLOR, LLP



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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

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**ELEVENTH APPLICATION OF ERIC D. GREEN FOR  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT  
OF EXPENSES AS LEGAL REPRESENTATIVE FOR FUTURE CLAIMANTS  
FOR THE PERIOD FROM SEPTEMBER 1, 2004 THROUGH SEPTEMBER 30, 2004**

Name of Applicant: Eric D. Green

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

Date of Retention: Order dated October 20, 2003,  
nunc pro tunc to September 10, 2003

Period for which compensation and  
reimbursement is sought: September 1, 2004 through September 30, 2004

Amount of Compensation sought as  
actual, reasonable and necessary: \$900.00

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	12/30/03	9/10/03-10/31/03	\$3,250.00	\$0.00	\$2,600.00	\$0.00
2	3/08/04	11/1/03-11/30/03	\$12,250.00	\$364.97	\$9,800.00	\$364.97
3	3/08/04	12/1/03-12/31/03	\$5,100.00	\$186.77	\$4,080.00	\$186.77
4	3/08/04	1/1/04 – 1/31/04	\$8,750.00	\$73.26	\$7,000.00	\$73.26
5	3/24/04	2/1/04 – 2/29/04	\$8,900.00	\$1,114.02	\$7,120.00	\$1,114.02
6	6/02/04	3/1/04 – 3/31/04	\$11,796.00	\$648.57	\$9,436.80	\$648.57
7	6/02/04	4/1/04 – 4/30/04	\$1,200.00	\$0.00	\$960.00	\$0.00
	6/10/04	9/10/03 – 02/29/04	\$7,680.00	\$0.00	\$6,144.00	\$0.00
8		5/1/04 – 5/31/04	\$2,100.00	\$0.00	\$1,680.00	\$0.00
9	8/31/04	7/1/04 – 7/31/04	\$4,500.00	\$0.00	\$3,600.00	\$0.00
10	10/11/04	8/1/04 – 8/31/04	\$6,000.00	\$0.00	\$0.00	\$0.00
	<b>TOTAL</b>		<b>\$71,526.00</b>	<b>\$2,387.59</b>	<b>\$52,420.80</b>	<b>\$2,387.59</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>
Eric D. Green		\$600.00	1.50	\$900.00
Grand Total:			1.50	\$900.00
Blended Rate:			\$600 / hour	

**COMPENSATION BY PROJECT CATEGORY**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Meetings (1008)	1.50	\$900.00
<b>TOTAL</b>	<b>1.50</b>	<b>\$900.00</b>

### EXPENSE SUMMARY

Expenses Category	Total Expenses
Computerized Legal Research	\$0.00
Delivery –Parcels, Inc.	\$0.00
Facsimile	\$0.00
Federal Express	\$0.00
Hotel/Lodging	\$0.00
Long Distance Telephone/Conference Call	\$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>

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Debtor. ) **Objection Deadline: November 29, 2004 at 4:00 p.m.**

**ELEVENTH APPLICATION OF ERIC D. GREEN  
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, Eric D. Green (hereinafter "Eric D. Green") hereby moves this Court for reasonable compensation for professional legal services as Legal Representative of Future Claimants (the "Future Claimants' Representative") in the amount of \$900.00 together with reimbursement for actual and necessary expenses incurred in the amount of \$0.00 for the period commencing September 1, 2004 through and including September 30, 2004 (the "Fee Period"). In support of its Application, Eric D. Green respectfully represents as follows:

1. Eric D. Green was appointed as the Future Claimants' Representative in connection with this chapter 11 case, pursuant to an Order dated October 20, 2003, nunc pro tunc to September 10, 2003. The Order authorized Eric D. Green 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 Eric D. Green were performed for or on behalf of Future Claimants and not on behalf of any debtor, creditor or other person

3. During the period covered by this Application, Eric D. Green 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 Eric D. Green 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 September 1, 2004 through September 30, 2004 showing the amount of \$900.00 due for fees.

#### SUMMARY OF SERVICES RENDERED

5. Eric D. Green has rendered professional services in this case during the Fee Period.

6. The services rendered by Eric D. Green during the Fee Period are detailed set forth in Exhibit A. Eric D. Green has rendered services with detail, along with the number of hours for each service performed and the total compensation sought in the attachments hereto.

#### DISBURSEMENTS

7. Eric D. Green has incurred no out-of-pocket disbursements during the Fee Period.

#### VALUATION OF SERVICES

9. Eric D. Green has expended a total of 1.50 hours in connection with this matter during the Fee Period.

10. The amount of time spent by Eric D. Green providing services to the Future Claimants for the Fee Period is fully set forth in Exhibit A attached hereto. These are Eric D. Green's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by Eric D. Green for the Fee Period as Future Claimants' Representative in these cases is \$900.00.

11. Eric D. Green 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, Eric D. Green requests that allowance be made to him in the sum of \$900.00 compensation for necessary professional services rendered for the Fee Period, and further requests such other and further relief as this Court may deem just and proper.

Dated: November 8, 2004



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

Legal Representative for Future Claimants

# Exhibit A

# RESOLUTIONS, LLC

222 BERKELEY STREET SUITE 1060 BOSTON, MA 02116  
Tel: 617-556-0800 · Fax: 617-556-9900 · Fed ID No. 04-3364284

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MetCoil - Eric D. Green

Page: 1  
10/07/2004  
Account No: 203068 -01M  
Statement No: 11330

MetCoil  
Legal Representative: Eric D. Green

## Fees

	Hours	
09/16/2004 Meeting with counsel re: final expert reports and status of final term sheet and trust funding agreement.	1.50	900.00
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For Professional Services	1.50	900.00
Total Current Work		900.00
Balance Due		\$900.00
		=====

Please make checks payable to RESOLUTIONS, LLC.

Payable upon receipt.