

# Exhibit A

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: 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


Analysis Research & Planning Corporation, consultants to Eric Green, Legal Representative for Future Claimants (the "Future Claimants' Representative"), has filed its **Tenth Application of Analysis Research & Planning Corporation for Compensation for Services Rendered and Reimbursement of Expenses for the Period from July 1, 2004 through July 31, 2004** (the "Application"). The Application seeks fees in the amount of \$40,778.50 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.**

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

Date Filed 10/11/04  
62563 1004  
1368

**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.	)	Objections Due: November 1, 2004 at 4:00 p.m.

**TENTH APPLICATION OF ANALYSIS RESEARCH PLANNING  
CORPORATION FOR COMPENSATION FOR SERVICES RENDERED  
AND REIMBURSEMENT OF EXPENSES AS CONSULTANT TO ERIC GREEN,  
LEGAL REPRESENTATIVE FOR FUTURE CLAIMANTS FOR THE  
PERIOD FROM JULY 1, 2004 THROUGH JULY 31, 2004**

Name of Applicant: Analysis, Research, and Planning Corporation  
("ARPC")

Authorized to Provide  
Professional Services to: Consultants to the Legal Representative to  
Future Claimants

Date of Retention: Order dated November 18, 2003,  
nunc pro tunc to September 23, 2003

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

Amount of Compensation sought as  
actual, reasonable and necessary: \$40,778.50

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

This is an: X interim \_\_\_\_ final  
application

This application includes no time incurred in connection with the preparation of interim fee applications.

Prior Applications:

			Requested		Approved	
	Date Filed	Period Covered	Fees	Expenses	Fees	Expenses
1	02/11/04	10/07/03 – 10/31/03	\$64,429.00	\$0.00	\$64,429.00	\$0.00
2	02/11/04	11/01/03 – 11/30/03	\$88,270.50	\$1,548.92	\$88,270.50	\$1,548.92
3	02/20/04	12/01/03 – 12/31/03	\$65,780.50	\$2,587.89	\$52,624.40	\$2,587.89
4	03/16/04	1/1/04 – 1/31/04	\$50,493.50	\$4,152.37	\$40,394.80	\$4,152.37
5	5/14/04	2/1/04 – 2/29/04	\$74,953.50	\$1,431.66	\$59,962.80	\$1,431.66
6	5/14/04	3/1/04 – 3/31/04	\$33,623.50	\$0.00	\$26,898.80	\$0.00
7	07/02/04	4/1/04 – 4/30/04	\$8,529.00	\$0.00	\$6,823.20	\$0.00
8	07/02/04	5/1/04 – 5/31/04	\$27,947.50	\$121.48	\$0.00	\$0.00
9	08/31/04	6/1/04 – 6/30/04	\$36,158.25	\$0.00	\$0.00	\$0.00
	<b>TOTALS</b>		<b>\$450,185.25</b>	<b>\$9,842.32</b>	<b>\$339,403.50</b>	<b>\$9,720.84</b>

## ATTACHMENT B TO FEE APPLICATION

Name of Individual	Title	Mini-Bio	Years Exp.	Hourly Rate *	Total Billed Hours	Total Compensation
Thomas Florence	Partner and President	Prior to joining ARPC, Mr. Florence was the partner of KPMG Peat Marwick LLP.	25	\$495	27.10	\$13,414.50
Gary Wingo	Partner	Prior to joining ARPC, Mr. Wingo was president of TechnologyNet, Inc. and BP of Ingram Micro, Inc.	21	\$385	28.90	\$11,126.50
Jean Malone	Sr. Consultant	Prior to joining ARPC, Dr. Malone was a consultant with PricewaterhouseCoopers and was Assistant Professor of Sociology at the University of North Carolina at Greensboro.	17	\$275	56.50	\$15,537.50
Al Lazo	Sr. Consultant	Prior to joining ARPC, Mr. Lazo was a director with B2 Technology and Consulting Services.	13	\$250	1.60	\$400.00
Marc Scarcella	Sr. Consultant	Previously Mr. Scarcella was a quantitative analyst with Claims Resolution Management Corporation – a subsidiary of Manville Asbestos Trust.	3	\$250	1.20	\$300.00
Grand Total					115.30	\$40,778.50
Blended Rate						\$353.57/hours

\* ARPC professionals' rates increased as of January 1, 2004 to reflect increased costs of operation and administrations for the prior year.

### COMPENSATION BY PROJECT CATEGORY

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration (1001)	29.65	\$11,877.25
Court Hearings (1002)	0.00	\$0.00
Lease/Executory Contract Issues (1005)	0.00	\$0.00
Use, Sale or Lease of Property (363 Issues) (1006)	0.00	\$0.00
Claims Analysis, Objections & Resolutions (1007)	6.10	\$1,990.75
Meetings (1008)	1.35	\$631.50
Other Adversary Proceedings (1011)	0.00	\$0.00
Plan & Disclosure Statement (1012)	78.20	\$26,279.00
Asset Analysis (1016)	0.00	\$0.00
Retention of Professionals / Fee Issues (1017)	0.00	\$0.00
Fee Application Preparation (1018)	0.00	\$0.00
Travel (1019)	0.00	\$0.00
<b>TOTAL</b>	<b>115.30</b>	<b>\$40,778.50</b>

### EXPENSE SUMMARY

Expenses Category	Total Expenses
Research and Publications	\$0.00
Delivery –Parcels, Inc.	\$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>

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

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**TENTH APPLICATION OF ANALYSIS RESEARCH PLANNING  
CORPORATION FOR COMPENSATION FOR SERVICES RENDERED  
AND REIMBURSEMENT OF EXPENSES AS CONSULTANT TO ERIC GREEN,  
LEGAL REPRESENTATIVE FOR FUTURE CLAIMANTS FOR THE  
PERIOD FROM JULY 1, 2004 THROUGH JULY 31, 2004**

Pursuant to 11 U.S.C. §§ 330 and 331 and Rule 2016 of the Federal Rules of Bankruptcy Procedure, the consulting firm of Analysis, Research, and Planning Corporation ("ARPC") hereby moves this Court for reasonable compensation for professional consulting services rendered as consultant to Eric Green, Legal Representative of Future Claimants (the "Future Claimants' Representative") in the amount of \$40,778.50 together with reimbursement for actual and necessary expenses incurred in the amount of \$0.00 for the period commencing July 1, 2004 through and including July 31, 2004 (the "Fee Period"). In support of its Application, ARPC respectfully represents as follows:

1. ARPC was employed under a general retainer to represent Eric Green as Future Claimants' Representative in connection with this case, pursuant to an Order dated November 18, 2003, effective as of September 23, 2003. The Order authorized ARPC 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 ARPC 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, ARPC 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 ARPC 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 July 1, 2004 through and including July 31, 2004 showing the amount of \$40,778.50 due for fees.

## SUMMARY OF SERVICES RENDERED

5. The professionals of ARPC who have rendered professional services in this case during the Fee Period are Thomas Florence, Gary Wingo, Jean Malone, Al Lazo and Marc Scarcella.

6. The services rendered by ARPC during the Fee Period are grouped into the categories set forth in Exhibit A. The partners and consultants 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. ARPC ARPC has incurred no out-of-pocket disbursements during the Fee Period.

VALUATION OF SERVICES

8. Consultants of ARPC have expended a total of 115.30 hours in connection with this matter during the Fee Period.

9. The amount of time spent by each of these persons providing services to the Future Claimants' Representative for the Fee Period is fully set forth in Exhibit A attached hereto. These are ARPC's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by ARPC for the Fee Period in these cases under Chapter 11 is \$40,778.50.

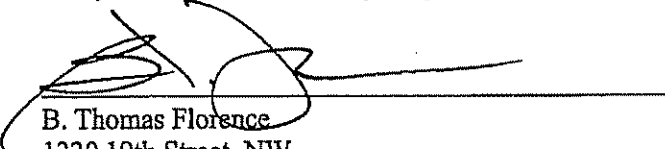
10. ARPC believes that the time entries included in Exhibit A attached hereto are in compliance with the requirements of Local Rule 2016-2.

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, ARPC requests that allowance be made to it in the sum of \$40,778.50 as compensation for necessary professional services rendered to the Committee for the Fee Period, and the sum of \$0.00 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: October 8, 2004

Analysis, Research, Planning Corporation



B. Thomas Florence  
1220 19th Street, NW  
Suite 700  
Washington, DC 20036  
(202) 721-0921

VERIFICATION

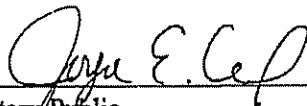
)  
DISTRICT OF COLUMBIA ) SS:  
)

B. Thomas Florence, after being duly sworn according to law, deposes and says:

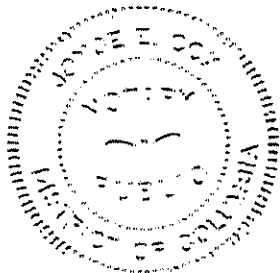
1. I am President of the applicant firm, Analysis, Research, and Planning Corporation.
2. I have personally performed many of the services rendered by ARPC and am thoroughly familiar with all other work performed on behalf of the Futures Representative by the professionals in the Firm. All of the services set forth in the Application were necessary to faithfully meet my responsibilities as consultant to the Futures Representative. In my experience, this rate is consistent with the rates charged by other professionals who provide similar services. Moreover, my hourly rate has been approved in numerous bankruptcy cases.
3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.

  
B. THOMAS FLORENCE

SWORN TO AND SUBSCRIBED before me this 8 day of October, 2004.

  
Notary Public  
My commission expires:

Joyce E. Cox  
Notary Public, District of Columbia  
My Commission Expires 12-14-2006



# Exhibit A



analysis-research-planning  
1220 19th Street, NW, Suite 700  
Washington, D.C. 20036  
Phone: (202) 797-1111  
Fax: (202) 797-3619

Date	Invoice #
10/4/2004	1105

**Client**

Timothy P. Cairns  
Young Conaway Stargatt & Taylor, LLP  
The Brandywine Building  
1000 West Street, 17th Floor  
Wilmington, Delaware 19801

For professional services rendered by ARPC for the billing period of 07/01/04 to 07/31/04

Activities in general include meetings and conference calls, review and analysis of data, preparation of analysis for negotiation and mediation, and other analyses requested. Detailed summary by employee is attached.

Project: METCOIL			
Employee	Billable Hours	Rate	Total
AL LAZO	1.60	250.00	400.00
GARY WINGO	28.90	385.00	11,126.50
JEAN MALONE	56.50	275.00	15,537.50
MARC SCARCELLA	1.20	250.00	300.00
TOM FLORENCE	27.10	495.00	13,414.50
Total Professional Fees			40,778.50
Total Expenses			-
Total Professional Fees and Expenses			40,778.50

If you have any questions about this invoice, please call Lan Yue at (202)797-1111. Thank you.

**METCOIL Project**  
**Summary of Staff Time (07/01/04 to 07/31/04)**

**Task: Cash Flow Modeling and Analysis**

Employee	Hours	Rate	Total
AL LAZO	1.60	250.00	400.00
GARY WINGO	3.45	385.00	1,328.25
MARC SCARCELLA	1.05	250.00	262.50

**Task: Deposition/Testimony Preparation**

Employee	Hours	Rate	Total
TOM FLORENCE	4.20	495.00	2,079.00

**Task: Plan and Claim Resolution Procedures**

Employee	Hours	Rate	Total
JEAN MALONE	56.50	275.00	15,537.50
TOM FLORENCE	21.70	495.00	10,741.50

**Task: Review of Case Documents and Materials**

Employee	Hours	Rate	Total
GARY WINGO	25.45	385.00	9,798.25

**Task: Conference Calls/Meetings**

Employee	Hours	Rate	Total
MARC SCARCELLA	0.15	250.00	37.50
TOM FLORENCE	1.20	495.00	594.00

<b>TOTAL AMOUNT</b>			<b>40,778.50</b>
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**METCOIL Project**

**Details of Staff Time (07/01/04 to 07/31/04)**

Task Cash Flow Modeling and Analysis			
Employee	Date	Hours	Description
AL LAZO	7/8/2004	0.70	Office conference with Mr. Wingo re Met-Coil/TCE PI Trust letter of credit issues. Review trust letter of credit provisions.
GARY WINGO	7/8/2004	1.20	Reviewed the LOC term sheet for changes and logic adjustments.
AL LAZO	7/9/2004	0.90	Review comments from Mr. Wingo re letter of credit analysis.
GARY WINGO	7/9/2004	2.25	Created email evaluation of LOC term sheet. Noted various problems. Researched effectiveness of Shareholders Equity trigger.
MARC SCARCELLA	7/21/2004	0.20	Met with Gary to review the cash flow component of the Met-Coil case so I could make any necessary changes during his absence next week.
MARC SCARCELLA	7/23/2004	0.85	Reviewed the Metcoil cash model in preparation of some potential model updates next week.
<b>Total for Task-</b>		<b>6.10</b>	

Task Conference Calls/Meetings			
Employee	Date	Hours	Description
MARC SCARCELLA	7/23/2004	0.15	conference call with Gary and Ed Herron.
TOM FLORENCE	7/28/2004	1.20	c/c w/team re:plan documents
<b>Total for Task-</b>		<b>1.35</b>	

Task Deposition/Testimony Preparation			
Employee	Date	Hours	Description
TOM FLORENCE	7/15/2004	3.00	Preparation of Affidavit
TOM FLORENCE	7/16/2004	1.20	Affidavit review
<b>Total for Task-</b>		<b>4.20</b>	

Task Plan and Claim Resolution Procedures			
Employee	Date	Hours	Description
JEAN MALONE	7/14/2004	2.10	Review notes and attachments from Gear meeting. Review materials for NERA report (not received). Prepare for confirmation of analyses tomorrow.
JEAN MALONE	7/15/2004	5.90	3.5 hrs Review, comments for draft affidavit. 2.4 hrs. Revise scenarios to include 2004 end date
JEAN MALONE	7/16/2004	4.40	Draft affidavits - review and comment
JEAN MALONE	7/20/2004	5.60	Prepare data for new financial forecast, based on Scenario E. Issue an input report for Gary.
JEAN MALONE	7/21/2004	4.10	Review NERA report. Tables for comparison with ARPC. Memo to file.
JEAN MALONE	7/22/2004	4.50	Review wording for 400k addition. Review analyses. Prepare to discuss with TF.
JEAN MALONE	7/23/2004	9.10	Analysis of 2003 A and varying BCD for annualized amounts. Report per property. Read and comment on Affidavit.
TOM FLORENCE	7/23/2004	6.20	Estimates and review insurance settlement with Eric
JEAN MALONE	7/26/2004	9.80	Verify Area A. Respond to YCST queries. Final report sections.
JEAN MALONE	7/27/2004	8.80	Revisions to final report. Reanalysis of annual increase. Read new version of TDP.
TOM FLORENCE	7/27/2004	6.30	TDP review of changes
JEAN MALONE	7/28/2004	2.20	prepare for conference call and participate in call
TOM FLORENCE	7/28/2004	6.30	Review of ADR, plan, TDP, CF's, etc.
TOM FLORENCE	7/29/2004	2.90	TDP review of changes
<b>Total for Task-</b>		<b>78.20</b>	

Task Review of Case Documents and Materials			
Employee	Date	Hours	Description
GARY WINGO	7/14/2004	4.10	Reviewed notes of various insurance mtgs from E. Harron. Evaluated various structural options from financial perspective. Developed email advisory msg in

			response.
GARY WINGO	7/20/2004	1.25	Provided updated schedule of claims and expense payments to E. Harron (YCST). Used latest forecast of claims from J. Malone.
GARY WINGO	7/21/2004	4.75	Reviewed Quanta insurance policy terms. Provided J. Malone with financial information for her review of NERA work.
GARY WINGO	7/22/2004	6.70	Reviewed latest addendum offer regarding pay-as-you-go approach for funding. Provided comments on financial aspects and risk to trust. Reconfigured model to include latest forecast of claims using post-03 exposures.
GARY WINGO	7/23/2004	3.50	Finalized comments on new offer. Phone con with D. Allen (FCR advisor) to discuss details of new offer.
GARY WINGO	7/28/2004	2.75	Review of latest term sheet to include recast of model for new topoff provision for claims costs. Composed explanatory email to YCST.
GARY WINGO	7/29/2004	1.90	Comments to T. Cairns (YCST) on latest bank covenants and provisions for protecting trusts interests using LOC provisions.
GARY WINGO	7/30/2004	0.50	Final review of current term sheet and emails from YCST on various changes this week.
<b>Total for Task-</b>		<b>25.45</b>	
<b>Total Hours</b>		<b>115.30</b>	



**File a Motion:**03-12676-MFW MET-COIL SYSTEMS (f/k/a MET-COIL SYSTEMS CORPORATI**U.S. Bankruptcy Court****District of Delaware**

## Notice of Electronic Filing

The following transaction was received from Harron, Edwin J. entered on 10/11/2004 at 3:45 PM EDT and filed on 10/11/2004

**Case Name:** MET-COIL SYSTEMS (f/k/a MET-COIL SYSTEMS

**Case Number:** 03-12676-MFW

**Document Number:** 1368

**Docket Text:**

Monthly Application for Compensation (*Tenth*) of Analysis, Research & Planning Corporation for July 2004 Filed by Eric D. Green. Objections due by 11/1/2004.. (Harron, Edwin)

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**N:\Bankruptcy\Met-Coil Systems\To Be Filed\ARPC App 10th July 04.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=983460418 [Date=10/11/2004] [FileNumber=3047337-0]  
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**03-12676-MFW Notice will be electronically mailed to:**

Ronald Barliant ronald.barliant@goldbergkohn.com,

Richard Michael Beck rbeck@klehr.com, lstanton@klehr.com

Joseph J. Bodnar jbodnar@monlaw.com

Charles J. Brown bankruptcyemail@elzufon.com

Daniel B. Butz dbutz@mnat.com,

Timothy Patrick Cairns bankruptcy@ycst.com,

James C. Carignan jcarignan@mnat.com,

Marc Stephen Casarino casarinom@whiteandwilliams.com,  
debankruptcy@whiteandwilliams.com

William E. Chipman Jr. bankruptcydel@gtlaw.com

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
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) Case No. 03-12676 (MFW)  
MET-COIL SYSTEMS CORPORATION, )  
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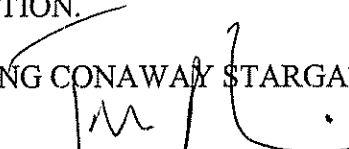
Analysis Research & Planning Corporation, consultants to Eric Green, Legal Representative for Future Claimants (the "Future Claimants' Representative"), has filed its **Eleventh Application of Analysis Research & Planning Corporation for Compensation for Services Rendered and Reimbursement of Expenses for the Period from August 1, 2004 through August 31, 2004** (the "Application"). The Application seeks fees in the amount of \$32,082.50 and expenses in the amount of \$464.89.

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 **November 1, 2004 at 4:00 p.m.**

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

10/11/04  
1369

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

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**ELEVENTH APPLICATION OF ANALYSIS RESEARCH PLANNING  
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Name of Applicant: Analysis, Research, and Planning Corporation  
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Authorized to Provide  
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actual, reasonable and necessary: \$32,082.50

Amount of Expense Reimbursement sought  
as actual, reasonable and necessary: \$464.89

This is an: X interim    \_\_\_ final  
application

This application includes no time incurred in connection with the preparation of interim fee applications.

Prior Applications:

			Requested		Approved	
	Date Filed	Period Covered	Fees	Expenses	Fees	Expenses
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2	02/11/04	11/01/03 – 11/30/03	\$88,270.50	\$1,548.92	\$88,270.50	\$1,548.92
3	02/20/04	12/01/03 – 12/31/03	\$65,780.50	\$2,587.89	\$52,624.40	\$2,587.89
4	03/16/04	1/1/04 – 1/31/04	\$50,493.50	\$4,152.37	\$40,394.80	\$4,152.37
5	5/14/04	2/1/04 – 2/29/04	\$74,953.50	\$1,431.66	\$59,962.80	\$1,431.66
6	5/14/04	3/1/04 – 3/31/04	\$33,623.50	\$0.00	\$26,898.80	\$0.00
7	07/02/04	4/1/04 – 4/30/04	\$8,529.00	\$0.00	\$6,823.20	\$0.00
8	07/02/04	5/1/04 – 5/31/04	\$27,947.50	\$121.48	\$0.00	\$0.00
9	08/31/04	6/1/04 – 6/30/04	\$36,158.25	\$0.00	\$0.00	\$0.00
10	10/__/04	7/1/04 – 7/31/04	\$40,778.50	\$464.89	\$0.00	\$0.00
	<b>TOTALS</b>		<b>\$490,963.75</b>	<b>\$10,307.21</b>	<b>\$339,403.50</b>	<b>\$9,720.84</b>

**ATTACHMENT B TO FEE APPLICATION**

Name of Individual	Title	Mini-Bio	Years Exp.	Hourly Rate *	Total Billed Hours	Total Compensation
Thomas Florence	Partner and President	Prior to joining ARPC, Mr. Florence was the partner of KPMG Peat Marwick LLP.	25	\$495	13.30	\$6,583.50
Gary Wingo	Partner	Prior to joining ARPC, Mr. Wingo was president of TechnologyNet, Inc. and BP of Ingram Micro, Inc.	21	\$385	32.40	\$12,474.00
Jean Malone	Sr. Consultant	Prior to joining ARPC, Dr. Malone was a consultant with PricewaterhouseCoopers and was Assistant Professor of Sociology at the University of North Carolina at Greensboro.	17	\$275	25.00	\$6,875.00
Al Lazo	Sr. Consultant	Prior to joining ARPC, Mr. Lazo was a director with B2 Technology and Consulting Services.	13	\$250	3.80	\$950.00
Marc Scarcella	Sr. Consultant	Previously Mr. Scarcella was a quantitative analyst with Claims Resolution Management Corporation – a subsidiary of Manville Asbestos Trust.	3	\$250	13.30	\$6,583.50
Grand Total					95.30	\$32,082.50
Blended Rate						\$336.65/hours

\* ARPC professionals' rates increased as of January 1, 2004 to reflect increased costs of operation and administrations for the prior year.

### COMPENSATION BY PROJECT CATEGORY

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration (1001)	55.30	\$18,199.00
Court Hearings (1002)	0.00	\$0.00
Lease/Executory Contract Issues (1005)	0.00	\$0.00
Use, Sale or Lease of Property (363 Issues) (1006)	0.00	\$0.00
Claims Analysis, Objections & Resolutions (1007)	2.80	\$770.00
Meetings (1008)	1.70	\$425.00
Other Adversary Proceedings (1011)	0.00	\$0.00
Plan & Disclosure Statement (1012)	35.50	\$12,688.50
Asset Analysis (1016)	0.00	\$0.00
Retention of Professionals / Fee Issues (1017)	0.00	\$0.00
Fee Application Preparation (1018)	0.00	\$0.00
Travel (1019)	0.00	\$0.00
<b>TOTAL</b>	<b>95.30</b>	<b>\$32,082.50</b>

### EXPENSE SUMMARY

Expenses Category	Total Expenses
Research and Publications	\$0.00
Delivery –Parcels, Inc.	\$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>

**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.	)	
	)	<b>Objections Due: November 1, 2004 at 4:00 p.m.</b>

**ELEVENTH APPLICATION OF ANALYSIS RESEARCH PLANNING  
CORPORATION 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**

Pursuant to 11 U.S.C. §§ 330 and 331 and Rule 2016 of the Federal Rules of Bankruptcy Procedure, the consulting firm of Analysis, Research, and Planning Corporation ("ARPC") hereby moves this Court for reasonable compensation for professional consulting services rendered as consultant to Eric Green, Legal Representative of Future Claimants (the "Future Claimants' Representative") in the amount of \$32,082.50 together with reimbursement for actual and necessary expenses incurred in the amount of \$464.89 for the period commencing August 1, 2004 through and including August 31, 2004 (the "Fee Period"). In support of its Application, ARPC respectfully represents as follows:

1. ARPC was employed under a general retainer to represent Eric Green as Future Claimants' Representative in connection with this case, pursuant to an Order dated November 18, 2003, effective as of September 23, 2003. The Order authorized ARPC 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 ARPC 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, ARPC 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 ARPC 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 and including August 31, 2004 showing the amount of \$32,082.50 due for fees.

## SUMMARY OF SERVICES RENDERED

5. The professionals of ARPC who have rendered professional services in this case during the Fee Period are Thomas Florence, Gary Wingo, Jean Malone, Al Lazo and Marc Scarcella.

6. The services rendered by ARPC during the Fee Period are grouped into the categories set forth in Exhibit A. The partners and consultants 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. ARPC has incurred out-of-pocket disbursements during the Fee Period in the amount of \$464.89. This disbursement sum is broken down into categories of charges, including,

among other things, delivery, Federal Express, facsimile, hotel/lodging, long distance telephone, parking, photocopy charges, postage, travel and working meals. 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. Consultants of ARPC have expended a total of 95.30 hours in connection with this matter during the Fee Period.

9. The amount of time spent by each of these persons providing services to the Future Claimants' Representative for the Fee Period is fully set forth in Exhibit A attached hereto. These are ARPC's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by ARPC for the Fee Period in these cases under Chapter 11 is \$32,082.50.

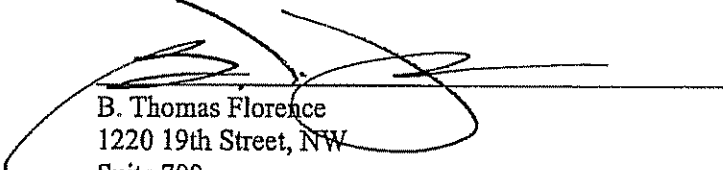
10. ARPC believes that the time entries included in Exhibit A attached hereto are in compliance with the requirements of Local Rule 2016-2.

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, ARPC requests that allowance be made to it in the sum of \$32,082.50 as compensation for necessary professional services rendered to the Committee for the Fee Period, and the sum of \$464.89 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: October 8, 2004

Analysis, Research, Planning Corporation



B. Thomas Florence  
1220 19th Street, NW  
Suite 700  
Washington, DC 20036  
(202) 721-0921

VERIFICATION

DISTRICT OF COLUMBIA )  
 )  
 ) SS:

B. Thomas Florence, after being duly sworn according to law, deposes and says:

1. I am President of the applicant firm, Analysis, Research, and Planning Corporation.
2. I have personally performed many of the services rendered by ARPC and am thoroughly familiar with all other work performed on behalf of the Futures Representative by the professionals in the Firm. All of the services set forth in the Application were necessary to faithfully meet my responsibilities as consultant to the Futures Representative. In my experience, this rate is consistent with the rates charged by other professionals who provide similar services. Moreover, my hourly rate has been approved in numerous bankruptcy cases.
3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.

  
B. THOMAS FLORENCE

SWORN TO AND SUBSCRIBED before me this 8 day of October, 2004.

  
Notary Public

My commission expires:

Joyce E. Cox  
Notary Public, District of Columbia  
My Commission Expires 12-14-2006



# Exhibit A



analysis-research-planning  
1220 19th Street, NW, Suite 700  
Washington, D.C. 20036  
Phone: (202) 797-1111  
Fax: (202) 797-3619

Date	Invoice #
10/5/2004	1160

**Client**

Timothy P. Cairns  
Young Conaway Stargatt & Taylor, LLP  
The Brandywine Building  
1000 West Street, 17th Floor  
Wilmington, Delaware 19801

For professional services rendered by ARPC for the billing period of 08/01/04 to 08/31/04.

Activities in general include meetings and conference calls, review and analysis of data, preparation of analysis for negotiation and mediation, and other analyses requested. Detailed summary by employee is attached.

<b>Project: METCOIL</b>			
<b>Employee</b>	<b>Billable Hours</b>	<b>Rate</b>	<b>Total</b>
AL LAZO	3.80	250.00	950.00
GARY WINGO	32.40	385.00	12,474.00
JEAN MALONE	25.00	275.00	6,875.00
MARC SCARCELLA	20.80	250.00	5,200.00
TOM FLORENCE	13.30	495.00	6,583.50
<b>Total Professional Fees</b>			<b>32,082.50</b>
<b>Total Expenses</b>			<b>464.89</b>
<b>Total Professional Fees and Expenses</b>			<b>32,547.39</b>

If you have any questions about this invoice, please call Lan Yue at (202)797-1111. Thank you.

**METCOIL Project****Summary of Staff Time (08/01/04 to 08/31/04)****Task : Cash Flow Modeling and Analysis**

Employee	Hours	Rate	Total
AL LAZO	3.80	250.00	950.00
GARY WINGO	32.40	385.00	12,474.00
MARC SCARCELLA	19.10	250.00	4,775.00

**Task : Claim Database (Historical & Current)**

Employee	Hours	Rate	Total
JEAN MALONE	2.80	275.00	770.00

**Task : Plan and Claim Resolution Procedures**

Employee	Hours	Rate	Total
JEAN MALONE	22.20	275.00	6,105.00
TOM FLORENCE	13.30	495.00	6,583.50

**Task : Conference Calls/Meetings**

Employee	Hours	Rate	Total
MARC SCARCELLA	1.70	250.00	425.00

<b>TOTAL AMOUNT</b>			<b>32,082.50</b>
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**METCOIL Project**

**Details of Staff Time (08/01/04 to 08/31/04)**

Task				Cash Flow Modeling and Analysis
Employee	Date	Hours	Description	
GARY WINGO	8/3/2004	8.20	Developed model of latest term sheet offer including various scenarios of line-of-credit options. Compared scenarios to previous term sheet for FCR.	
MARC SCARCELLA	8/3/2004	4.30	Participated on a number of calls with Ed Harron, Craig Grear and Gary Wingo and conducted various analysis request in conjunction with Gary.	
GARY WINGO	8/4/2004	1.70	Reviewed latest term sheet. Described present value concepts to YCST to provide advice on how to structure LOC.	
MARC SCARCELLA	8/4/2004	5.30	Continued Collateral Coverage Ratio and Cash flow analysis per Ed Harron's request.	
GARY WINGO	8/5/2004	2.20	Reviewed email on concerns about LOC issue. Provided analysis of M. Scarcella (ARPC) spreadsheet showing how LOC might work. Reviewed concepts with E. Green (FCR) and D. Allen (Advisor) on phone call.	
MARC SCARCELLA	8/5/2004	0.40	Follow-up e-mail correspondants with Gary briefing him on the prior day's developments.	
GARY WINGO	8/6/2004	6.80	Reviewed latest term sheet delivered this AM. Noted that structure of LOC had changed and reconciled against prior design. Developed examples and compared to Scarcella analyses sent prior. Sent email to indicate analytical results.	
MARC SCARCELLA	8/6/2004	8.00	Provided analysis based on the current terms sheet proposal and an optional proposal that would apply an annual growth rate to the first and second lines of credit.	
			Had three separate phone conversations with Craig Grear throughout the afternoon to sort out some of these issues as he prepared an updated draft of the term sheet.	
GARY WINGO	8/9/2004	7.70	Continued to review latest term sheet and model parameters. Various changes to LOC logic required extensive changes to model. Provided tabular and graphic output to YCST attorneys.	
MARC SCARCELLA	8/9/2004	1.10	Reviewed the latest term sheet and analyzed its model implications with Gary Wingo.	
GARY WINGO	8/10/2004	5.80	Developed final model based on final spreadsheet. Reconciled with previous model versions. Developed visual output for E. Green (FCR). Numerous phone calls with E. Harron on various results.	
AL LAZO	8/12/2004	0.70	Begin review of term sheet agreement.	
AL LAZO	8/23/2004	3.10	Continue review of term sheet agreement. Quality check cash flow model and line of credit calculations.	
<b>Total for Task-</b>		<b>55.30</b>		

Task				Claim Database (Historical & Current)
Employee	Date	Hours	Description	
JEAN MALONE	8/9/2004	2.80	Finalize and submit final report.	
<b>Total for Task-</b>		<b>2.80</b>		

Task				Conference Calls/Meetings
Employee	Date	Hours	Description	
MARC SCARCELLA	8/5/2004	1.70	Phone conversation with Doug Allen stepping him through the prior day's analysis in preparation of a summary he is putting together for Eric Green.	
<b>Total for Task-</b>		<b>1.70</b>		

Task				Plan and Claim Resolution Procedures
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Employee	Date	Hours	Description
TOM FLORENCE	8/2/2004	5.10	Final scenarios related to proposed changes by Metcoil
JEAN MALONE	8/4/2004	7.80	Draft report and appendices
JEAN MALONE	8/5/2004	5.20	ARPC final report - QC, meet with Jennifer F., revise
JEAN MALONE	8/6/2004	9.20	Receive comments on report; revise; create new appendix with computational details
TOM FLORENCE	8/9/2004	5.90	Final report prep for Eric
TOM FLORENCE	8/10/2004	2.30	Matrix value evaluation re:changes
<b>Total for Task-</b>		<b>35.50</b>	
<b>Total Hours</b>		<b>95.30</b>	

# Exhibit B

**METCOIL Project****Expenses - Billing Period (08/01/04 to 08/31/04)**

Expenses	Date	Amount	Employee
CARSERVICE (1/2)	12/03/03	37.50	TOM FLORENCE
TAXI (1/2)	12/03/03	5.75	TOM FLORENCE
LONG DISTANCE PHONE FROM HOTEL	08/06/04	104.11	GARY WINGO
FEE FOR EMAIL LINK FROM HOTEL	08/07/04	294.67	GARY WINGO
FEDEX	08/13/04	11.43	TOM FLORENCE
FEDEX	08/24/04	11.43	TOM FLORENCE
<b>Total Expenses</b>		<b>464.89</b>	

\* The phone and email expenses were incurred for the work in the Metcoil case.

**File a Motion:**03-12676-MFW MET-COIL SYSTEMS (f/k/a MET-COIL SYSTEMS CORPORATI**U.S. Bankruptcy Court****District of Delaware**

## Notice of Electronic Filing

The following transaction was received from Harron, Edwin J. entered on 10/11/2004 at 3:48 PM EDT and filed on 10/11/2004

**Case Name:** MET-COIL SYSTEMS (f/k/a MET-COIL SYSTEMS

**Case Number:** 03-12676-MFW

**Document Number:** 1369

**Docket Text:**

Monthly Application for Compensation (*Eleventh*) of Analysis, Research & Planning Corporation for August 2004 Filed by Eric D. Green. Objections due by 11/1/2004.. (Harron, Edwin)

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**N:\Bankruptcy\Met-Coil Systems\To Be Filed\ARPC App 11th Aug 04.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=983460418 [Date=10/11/2004] [FileNumber=3047346-0  
] [873dec2fc86b0b209159541c6aa31b0654662972c4f4f16713255c3fa7b28f30e72  
b5418bc8db4323f5a103e46a1a795eea4cbb658e72aa40e9adf91bfa09bd8]]

**03-12676-MFW Notice will be electronically mailed to:**

Ronald Barliant ronald.barliant@goldbergkohn.com,

Richard Michael Beck rbeck@klehr.com, lstanton@klehr.com

Joseph J. Bodnar jbodnar@monlaw.com

Charles J. Brown bankruptcyemail@elzefon.com

Daniel B. Butz dbutz@mnat.com,

Timothy Patrick Cairns bankruptcy@ycst.com,

James C. Carignan jcarignan@mnat.com,

Marc Stephen Casarino casarinom@whiteandwilliams.com,  
debankruptcy@whiteandwilliams.com

William E. Chipman Jr. bankruptcydel@gtlaw.com

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: December 9, 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


Analysis Research & Planning Corporation, consultants to Eric Green, Legal Representative for Future Claimants (the "Future Claimants' Representative"), has filed its **Twelfth Application of Analysis Research & Planning Corporation 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 \$6,967.75 and expenses in the amount of \$11.43.

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 **December 9, 2004 at 4:00 p.m.**

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 19, 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.	)	Objections Due: December 9, 2004 at 4:00 p.m.

**TWELFTH APPLICATION OF ANALYSIS RESEARCH PLANNING  
CORPORATION FOR COMPENSATION FOR SERVICES RENDERED  
AND REIMBURSEMENT OF EXPENSES AS CONSULTANT TO ERIC GREEN,  
LEGAL REPRESENTATIVE FOR FUTURE CLAIMANTS FOR THE  
PERIOD FROM SEPTEMBER 1, 2004 THROUGH SEPTEMBER 30, 2004**

Name of Applicant: Analysis, Research, and Planning Corporation  
("ARPC")

Authorized to Provide  
Professional Services to: Consultants to the Legal Representative to  
Future Claimants

Date of Retention: Order dated November 18, 2003,  
nunc pro tunc to September 23, 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: \$6,967.75

Amount of Expense Reimbursement sought  
as actual, reasonable and necessary: \$11.43

This is an: X interim    \_\_\_ final  
application

This application includes no time incurred in connection with the preparation of interim fee applications.

Prior Applications:

			Requested		Approved	
	Date Filed	Period Covered	Fees	Expenses	Fees	Expenses
1	02/11/04	10/07/03 – 10/31/03	\$64,429.00	\$0.00	\$64,429.00	\$0.00
2	02/11/04	11/01/03 – 11/30/03	\$88,270.50	\$1,548.92	\$88,270.50	\$1,548.92
3	02/20/04	12/01/03 – 12/31/03	\$65,780.50	\$2,587.89	\$52,624.40	\$2,587.89
4	03/16/04	1/1/04 – 1/31/04	\$50,493.50	\$4,152.37	\$40,394.80	\$4,152.37
5	5/14/04	2/1/04 – 2/29/04	\$74,953.50	\$1,431.66	\$59,962.80	\$1,431.66
6	5/14/04	3/1/04 – 3/31/04	\$33,623.50	\$0.00	\$26,898.80	\$0.00
7	07/02/04	4/1/04 – 4/30/04	\$8,529.00	\$0.00	\$6,823.20	\$0.00
8	07/02/04	5/1/04 – 5/31/04	\$27,947.50	\$121.48	\$0.00	\$0.00
9	08/31/04	6/1/04 – 6/30/04	\$36,158.25	\$0.00	\$0.00	\$0.00
10	10/11/04	7/1/04 – 7/31/04	\$40,778.50	\$0.00	\$0.00	\$0.00
11	10/11/04	8/1/04 – 8/31/04	\$32,082.50	\$464.89	\$0.00	\$0.00
	<b>TOTALS</b>		<b>\$523,046.25</b>	<b>\$10,307.21</b>	<b>\$339,403.50</b>	<b>\$9,720.84</b>

### ATTACHMENT B TO FEE APPLICATION

Name of Individual	Title	Mini-Bio	Years Exp.	Hourly Rate *	Total Billed Hours	Total Compensation
Gary Wingo	Partner	Prior to joining ARPC, Mr. Wingo was president of TechnologyNet, Inc. and BP of Ingram Micro, Inc.	21	\$385	4.65	\$1,790.25
Jean Malone	Sr. Consultant	Prior to joining ARPC, Dr. Malone was a consultant with PricewaterhouseCoopers and was Assistant Professor of Sociology at the University of North Carolina at Greensboro.	17	\$275	10.30	\$2,832.50
Marc Scarcella	Sr. Consultant	Previously Mr. Scarcella was a quantitative analyst with Claims Resolution Management Corporation – a subsidiary of Manville Asbestos Trust.	3	\$250	3.00	\$750.00
Andrew Oh	Sr. Controller	M.A. in Demography from Georgetown University	6	\$205	2.00	\$410.00
Nirjan Rai	Analyst	B.A. in Political Science and Minor in Math from Bennington College	2	\$195	4.00	\$780.00
Robin Rozicer	Analyst	B.A. in American Studies from George Washington University and Paralegal Certificate from George Mason University	3	\$135	3.00	\$405.00
Grand Total					26.95	\$6,967.75
Blended Rate						\$258.54/hours

\* ARPC professionals' rates increased as of January 1, 2004 to reflect increased costs of operation and administrations for the prior year.



### COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees
Case Administration (1001)	9.00	\$1,595.00
Court Hearings (1002)	0.00	\$0.00
Lease/Executory Contract Issues (1005)	0.00	\$0.00
Use, Sale or Lease of Property (363 Issues) (1006)	0.00	\$0.00
Claims Analysis, Objections & Resolutions (1007)	10.30	\$2,832.50
Meetings (1008)	0.00	\$0.00
Other Adversary Proceedings (1011)	0.00	\$0.00
Plan & Disclosure Statement (1012)	0.00	\$0.00
Asset Analysis (1016)	7.65	\$2,540.25
Retention of Professionals / Fee Issues (1017)	0.00	\$0.00
Fee Application Preparation (1018)	0.00	\$0.00
Travel (1019)	0.00	\$0.00
<b>TOTAL</b>	<b>26.95</b>	<b>\$6,967.75</b>

### EXPENSE SUMMARY

Expenses Category	Total Expenses
Research and Publications	\$0.00
Delivery –Parcels, Inc.	\$0.00
Facsimile	\$0.00
Federal Express	\$11.43
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>\$11.43</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.	)	
	)	<b>Objections Due: December 9, 2004 at 4:00 p.m.</b>

**TWELFTH APPLICATION OF ANALYSIS RESEARCH PLANNING  
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LEGAL REPRESENTATIVE FOR FUTURE CLAIMANTS FOR THE  
PERIOD FROM SEPTEMBER 1, 2004 THROUGH SEPTEMBER 30, 2004**

Pursuant to 11 U.S.C. §§ 330 and 331 and Rule 2016 of the Federal Rules of Bankruptcy Procedure, the consulting firm of Analysis, Research, and Planning Corporation ("ARPC") hereby moves this Court for reasonable compensation for professional consulting services rendered as consultant to Eric Green, Legal Representative of Future Claimants (the "Future Claimants' Representative") in the amount of \$6,967.75 together with reimbursement for actual and necessary expenses incurred in the amount of \$11.43 for the period commencing September 1, 2004 through and including September 30, 2004 (the "Fee Period"). In support of its Application, ARPC respectfully represents as follows:

1. ARPC was employed under a general retainer to represent Eric Green as Future Claimants' Representative in connection with this case, pursuant to an Order dated November 18, 2003, effective as of September 23, 2003. The Order authorized ARPC 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 ARPC 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, ARPC 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 ARPC 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 and including September 30, 2004 showing the amount of \$6,967.75 due for fees.

## SUMMARY OF SERVICES RENDERED

5. The professionals of ARPC who have rendered professional services in this case during the Fee Period are Gary Wingo, Jean Malone, Marc Scarcella, Andrew Oh, Nirjan Rai and Robin Rozicer.

6. The services rendered by ARPC during the Fee Period are grouped into the categories set forth in Exhibit A. The partners and consultants 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. ARPC has incurred out-of-pocket disbursements during the Fee Period in the amount of \$11.43. This disbursement sum is broken down into categories of charges, including,

among other things, delivery, Federal Express, facsimile, hotel/lodging, long distance telephone, parking, photocopy charges, postage, travel and working meals. 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. Consultants of ARPC have expended a total of 26.95 hours in connection with this matter during the Fee Period.

9. The amount of time spent by each of these persons providing services to the Future Claimants' Representative for the Fee Period is fully set forth in Exhibit A attached hereto. These are ARPC's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by ARPC for the Fee Period in these cases under Chapter 11 is \$6,967.75.

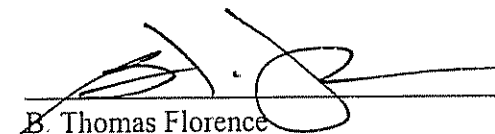
10. ARPC believes that the time entries included in Exhibit A attached hereto are in compliance with the requirements of Local Rule 2016-2.

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, ARPC requests that allowance be made to it in the sum of \$6,967.75 as compensation for necessary professional services rendered to the Committee for the Fee Period, and the sum of \$11.43 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: November 18, 2004

Analysis, Research, Planning Corporation



---

B. Thomas Florence  
1220 19th Street, NW  
Suite 700  
Washington, DC 20036  
(202) 721-0921

VERIFICATION

DISTRICT OF COLUMBIA    )  
                                      )  
                                      )       SS:

B. Thomas Florence, after being duly sworn according to law, deposes and says:

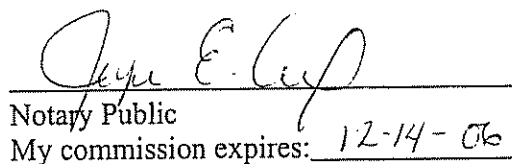
1.       I am President of the applicant firm, Analysis, Research, and Planning Corporation.

2.       I have personally performed many of the services rendered by ARPC and am thoroughly familiar with all other work performed on behalf of the Futures Representative by the professionals in the Firm. All of the services set forth in the Application were necessary to faithfully meet my responsibilities as consultant to the Futures Representative. In my experience, this rate is consistent with the rates charged by other professionals who provide similar services. Moreover, my hourly rate has been approved in numerous bankruptcy cases.

3.       The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.

  
B. THOMAS FLORENCE

SWORN TO AND SUBSCRIBED before me this 18 day of November, 2004.

  
Notary Public  
My commission expires: 12-14-06

**Joyce E. Cox**  
Notary Public, District of Columbia  
My Commission Expires 12-14-2006

# Exhibit A





analysis-research-planning  
1220 19th Street, NW, Suite 700  
Washington, D.C. 20036  
Phone: (202) 797-1111  
Fax: (202) 797-3619

11-08-2004 RCVD

Date	Invoice #
11/1/2004	1206

Client: Timothy P. Cairns

Timothy P. Cairns  
Young Conaway Stargatt & Taylor, LLP  
The Brandywine Building  
1000 West Street, 17th Floor  
Wilmington, Delaware 19801

For professional services rendered by ARPC for the billing period of 09/01/04 to 09/30/04

Activities in general include meetings and conference calls, review and analysis of data, preparation of analysis for negotiation and mediation, and other analyses requested. Detailed summary by employee is attached.

Project :	Employee	Billable Hours	Rate	Total
METCOIL	ANDREW OH	2.00	205.00	410.00
	GARY WINGO	4.65	385.00	1,790.25
	JEAN MALONE	10.30	275.00	2,832.50
	MARC SCARCELLA	3.00	250.00	750.00
	NIRJAN RAI	4.00	195.00	780.00
	ROBIN ROZICER	3.00	135.00	405.00
	<b>Total Professional Fees</b>			<b>6,967.75</b>
	<b>Total Expenses</b>			<b>11.43</b>
	<b>Total Professional Fees and Expenses</b>			<b>6,979.18</b>

If you have any questions about this invoice, please call Lan Yue at (202)797-1111. Thank you.

## LIST OF PROFESSIONALS CONTRIBUTING SERVICES

<u>Name of Individual</u>	<u>Initials</u>	<u>Title</u>	<u>Years Exp</u>	<u>Hourly Rate</u>	<u>Education</u>	<u>Mini-Bio</u>
B. Thomas Florence	BTF	Partner and Presid	26	\$495	Ph.D. in Research Design and Statistics from Michigan State University	Dr. Florence has significant experience in litigation consulting, class action and mass tort case management, toxic tort evaluation, environmental risk assessment, large-scale statistical modeling and work flow design and computerization. Prior to joining ARPC, Mr. Florence was the partner of KPMG Peat Marwick LLP.
Gary Wingo	GW	Partner	21	\$385	B.S. in Electrical Engineering from US Military Academy; M.S. in Management from Massachusetts Institute of Technology	Mr. Wingo has extensive experience in applying analytical expertise to both litigation and business challenges. Mr. Wingo was president of TechnologyNet, Inc. and VP of Ingram Micro, Inc.
Jean Malone	JEM	Sr. Consultant	18	\$275	Ph.D. and M.A. in Sociology from State University of New York at Stony Brook	Ms. Malone has strong expertise in survey design, statistical analysis, and project management. Prior to joining ARPC, Dr. Malone was a consultant with PricewaterhouseCoopers and was Assistant Professor of Sociology at the University of North Carolina at Greensboro..
Andrew Oh	ADO	Sr. Consultant	6	\$205	M.A. in Demography from Georgetown University	Prior to joining ARPC, Mr. Oh was a research associate with TecMRKT Works and a research analyst with Fairfax County Public Schools.
Marc Scarcella	MS	Sr. Consultant	3	\$250	M.A. in Economics from American University	Previously Mr. Scarcella was a quantitative analyst with Claims Resolution Management Corporation - a subsidiary of Manville Asbestos Trust.

Nirjan Rai	NR	Analyst	2	\$195	B.A. in Political Science and Minor in Math from Bennington College	Previously Mr. Rai worked as an analyst at Celotex Trust for Special Counsel.
Robin Rozicer	RR	Analyst	3	\$135	B.A. in American Studies from George Washington University and Paralegal Certificate from George Mason University	Previously Ms. Rozicer was a paralegal with Sonosky, Chambers, Sachse, Endreson & Perry LLP.

**METCOIL Project**

**Summary of Staff Time (09/01/04 to 09/30/04)**

**Task : Cash Flow Modeling and Analysis**

Employee	Hours	Rate	Total
GARY WINGO	4.65	385.00	1,790.25
MARC SCARCELLA	3.00	250.00	750.00

**Task : Claim Analysis, Objections POC**

Employee	Hours	Rate	Total
JEAN MALONE	10.30	275.00	2,832.50

**Task : Review of Case Documents and Materials**

Employee	Hours	Rate	Total
ANDREW OH	2.00	205.00	410.00
NIRJAN RAI	4.00	195.00	780.00
ROBIN ROZICER	3.00	135.00	405.00

<b>TOTAL AMOUNT</b>			<b>6,967.75</b>
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**METCOIL Project**

**Details of Staff Time (09/01/04 to 09/30/04)**

Task Cash Flow Modeling and Analysis				
Employee	Date	Hours	Description	
GARY WINGO	9/30/2004	4.65	1.25h Developed projections indicating expenses for Metcoil trust to be presented to L. Fitzpatrick. 3.4h Created model to account for PV cap and optimization routine to meet that cap.	
MARC SCARCELLA	9/30/2004	3.00	Programmed the interactive cap of \$5.3 million in total PV expense contribution into the cash flow model.	
Total for Task-		7.65		

Task Claim Analysis, Objections POC				
Employee	Date	Hours	Description	
JEAN MALONE	9/20/2004	1.40	Preliminary review of squamous cell literature	
JEAN MALONE	9/23/2004	3.30	1.6h Review websites including NCI, Skin Cancer Insititue, CDC for literature on squamous cell cancer rates. 0.7h Review publications. 0.2h Calls to institutes. 0.8h Prepare procedure for R. Rocizer to continue search and supervise.	
JEAN MALONE	9/28/2004	2.40	0.8h Review publications on Skin Cancer from Jeff Mandel. 1.6h Review the Wartenburg paper that defined cancers.	
JEAN MALONE	9/29/2004	3.20	0.8h Additional internet research on skin cancer. 1.6h Calculate effect using best estimate so far. 0.8h Write memo to file.	
Total for Task-		10.30		

Task Review of Case Documents and Materials				
Employee	Date	Hours	Description	
ROBIN ROZICER	9/23/2004	3.00	Conducted statistical research related to Squamous skin cancer per Jean's request.	
ANDREW OH	9/28/2004	2.00	Converted Wartenberg document to PDF and sent to Jean.	
NIRJAN RAI	9/30/2004	4.00	Researched for any literature on Squamous Skin Cancer per Gene's Request.	
Total for Task-		9.00		

**Total Hours 26.95**

# Exhibit B

METCOIL Project  
Expenses - Billing Period (09/01/04 to 09/30/04)

Expenses	Date	Amount	Employee
FEDEX	09/01/04	11.43	TOM FLORENCE
Total Expenses		11.43	



Invoice Number: 1-993-37930

Invoice Date: Sep 07, 2004

Account Number: 2202-0317-4

Page: 14 of 16

## FedEx Express Shipment Detail By Reference (Original)

Dropped off: Aug 30, 2004

Payor: Shipper

Reference: METCOIL

- Fuel Surcharge - FedEx has applied a fuel surcharge of 7.00% to this shipment
- Distance Based Pricing, Zone 2

<u>InternetShip</u>		<u>Sender</u>	<u>Recipient</u>
Tracking ID	790749032882	JOYCE COX	KIMBERLY BECK
Service Type	FedEx Priority Overnight	ARPC	YOUNG CONAWAY STARGATT & TAYLO
Package Type	FedEx Envelope	1220 19TH ST NW	THE BRANDYWINE BUILDING
Zone	2	WASHINGTON DC 20036-2405 US	WILMINGTON DE 19801 US
Packages	1		
Weight	1.0 lbs, 0.5 kgs	Transportation Charge	13.35
Delivered	Aug 31, 2004 08:58	Discount	-2.67
Svc Area	A1	Fuel Surcharge	0.75
Signed by	A FIGAROL		
FedEx Use	557620810/0000186/_	<b>Total Charge</b>	<b>USD \$ 11.43</b>
		<b>Shipment Detail Subtotal .....</b>	<b>USD \$ 11.43</b>



**File a Motion:**03-12676-MFW MET-COIL SYSTEMS (f/k/a MET-COIL SYSTEMS CORPORATI**U.S. Bankruptcy Court****District of Delaware**

## Notice of Electronic Filing

The following transaction was received from Cairns, Timothy Patrick entered on 11/19/2004 at 2:30 PM EST and filed on 11/19/2004

**Case Name:** MET-COIL SYSTEMS (f/k/a MET-COIL SYSTEMS CORPORATI

**Case Number:** 03-12676-MFW

**Document Number:** 1431

**Docket Text:**

Application for Compensation *for Services Rendered and Reimbursement of Expenses for the Period from September 1, 2004 through September 30, 2004 (TWELFTH)* Filed by Analysis Research & Planning Corporation. Objections due by 12/9/2004.. (Cairns, Timothy)

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**N:\Bankruptcy\Amy's Folder\12th Fee App ARPC 9-04.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=983460418 [Date=11/19/2004] [FileNumber=3188852-0]  
] [3caac12ed9647183002a2ad334d0e22c663aa06d619a66620f595ece354a7dde49b  
c7130b510c15ffab8d127fa80e59a552c73c6befc4235560f8516f18cc366]]

**03-12676-MFW Notice will be electronically mailed to:**

Ronald Barliant ronald.barliant@goldbergkohn.com,

Richard Michael Beck rbeck@klehr.com, lstanton@klehr.com

Joseph J. Bodnar jbodnar@monlaw.com

Charles J. Brown bankruptcyemail@elzufon.com

Daniel B. Butz dbutz@mnat.com,

Timothy Patrick Cairns bankruptcy@ycst.com,

James C. Carignan jcarignan@mnat.com,

Marc Stephen Casarino casarinom@whiteandwilliams.com, debankruptcy@whiteandwilliams.com

William E. Chipman Jr. bankruptcydel@gtlaw.com

Victoria Watson Counihan bankruptcydel@gtlaw.com

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: December 13, 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

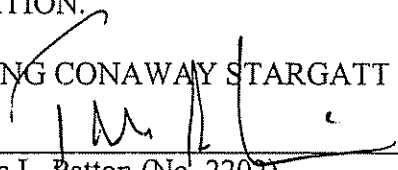
Analysis Research & Planning Corporation, consultants to Eric Green, Legal Representative for Future Claimants (the "Future Claimants' Representative"), has filed its **Thirteenth Application of Analysis Research & Planning Corporation for Compensation for Services Rendered and Reimbursement of Expenses for the Period from October 1, 2004 through October 19, 2004** (the "Application"). The Application seeks fees in the amount of \$4,146.25 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 **December 13, 2004 at 4:00 p.m.**

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 23, 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

Date Filed 11/23/04  
Docket # 1443

**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.	)	Objections Due: December 13, 2004 at 4:00 p.m.

**THIRTEENTH APPLICATION OF ANALYSIS RESEARCH PLANNING  
CORPORATION FOR COMPENSATION FOR SERVICES RENDERED  
AND REIMBURSEMENT OF EXPENSES AS CONSULTANT TO ERIC GREEN,  
LEGAL REPRESENTATIVE FOR FUTURE CLAIMANTS FOR THE  
PERIOD FROM OCTOBER 1, 2004 THROUGH OCTOBER 19, 2004**

Name of Applicant: Analysis, Research, and Planning Corporation  
("ARPC")

Authorized to Provide  
Professional Services to: Consultants to the Legal Representative to  
Future Claimants

Date of Retention: Order dated November 18, 2003,  
nunc pro tunc to September 23, 2003

Period for which compensation and  
reimbursement is sought: October 1, 2004 through October 19, 2004

Amount of Compensation sought as  
actual, reasonable and necessary: \$4,146.25

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

This is an: X interim    \_\_\_ final  
application

This application includes 1.00 hours of time with a value of \$205.00 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	02/11/04	10/07/03 – 10/31/03	\$64,429.00	\$0.00	\$64,429.00	\$0.00
2	02/11/04	11/01/03 – 11/30/03	\$88,270.50	\$1,548.92	\$88,270.50	\$1,548.92
3	02/20/04	12/01/03 – 12/31/03	\$65,780.50	\$2,587.89	\$52,624.40	\$2,587.89
4	03/16/04	1/1/04 – 1/31/04	\$50,493.50	\$4,152.37	\$40,394.80	\$4,152.37
5	5/14/04	2/1/04 – 2/29/04	\$74,953.50	\$1,431.66	\$59,962.80	\$1,431.66
6	5/14/04	3/1/04 – 3/31/04	\$33,623.50	\$0.00	\$26,898.80	\$0.00
7	07/02/04	4/1/04 – 4/30/04	\$8,529.00	\$0.00	\$6,823.20	\$0.00
8	07/02/04	5/1/04 – 5/31/04	\$27,947.50	\$121.48	\$22,358.00	\$121.48
9	08/31/04	6/1/04 – 6/30/04	\$36,158.25	\$0.00	\$0.00	\$0.00
10	10/11/04	7/1/04 – 7/31/04	\$40,778.50	\$0.00	\$0.00	\$0.00
11	10/11/04	8/1/04 – 8/31/04	\$32,082.50	\$464.89	\$0.00	\$0.00
12	11/19/04	9/1/04 – 9/30/04	\$6,967.75	\$11.43	\$0.00	\$0.00
	<b>TOTALS</b>		<b>\$530,014.00</b>	<b>\$10,318.64</b>	<b>\$361,761.50</b>	<b>\$9,842.32</b>

### ATTACHMENT B TO FEE APPLICATION

Name of Individual	Title	Mini-Bio	Years Exp.	Hourly Rate *	Total Billed Hours	Total Compensation
Thomas Florence	Partner and President	Prior to joining ARPC, Mr. Florence was the partner of KPMG Peat Marwick LLP.	25	\$495	4.50	\$2,227.50
Gary Wingo	Partner	Prior to joining ARPC, Mr. Wingo was president of TechnologyNet, Inc. and BP of Ingram Micro, Inc.	21	\$385	2.25	\$866.25
Jean Malone	Sr. Consultant	Prior to joining ARPC, Dr. Malone was a consultant with PricewaterhouseCoopers and was Assistant Professor of Sociology at the University of North Carolina at Greensboro.	17	\$275	2.40	\$660.00
Marc Scarcella	Sr. Consultant	Previously Mr. Scarcella was a quantitative analyst with Claims Resolution Management Corporation – a subsidiary of Manville Asbestos Trust.	3	\$250	.75	\$187.50
Lan Yue	Controller	Prior to joining ARPC, Ms. Yue was a financial accountant with E.spire Communications.	5	\$205	1.00	\$205.0
Grand Total					10.90	\$4,146.25
Blended Rate						\$380.39/hours

\* ARPC professionals' rates increased as of January 1, 2004 to reflect increased costs of operation and administrations for the prior year.

### COMPENSATION BY PROJECT CATEGORY

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration (1001)	0.00	\$0.00
Court Hearings (1002)	0.00	\$0.00
Lease/Executory Contract Issues (1005)	0.00	\$0.00
Use, Sale or Lease of Property (363 Issues) (1006)	0.00	\$0.00
Claims Analysis, Objections & Resolutions (1007)	0.00	\$0.00
Meetings (1008)	0.00	\$0.00
Other Adversary Proceedings (1011)	0.00	\$0.00
Plan & Disclosure Statement (1012)	6.90	\$2,887.50
Asset Analysis (1016)	3.00	\$1,053.75
Retention of Professionals / Fee Issues (1017)	0.00	\$0.00
Fee Application Preparation (1018)	1.00	\$205.0
Travel (1019)	0.00	\$0.00
<b>TOTAL</b>	<b>10.90</b>	<b>\$4,146.25</b>

### EXPENSE SUMMARY

Expenses Category	Total Expenses
Research and Publications	\$0.00
Delivery –Parcels, Inc.	\$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>

**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.	)	
	)	Objections Due: December 13, 2004 at 4:00 p.m.

**THIRTEENTH APPLICATION OF ANALYSIS RESEARCH PLANNING  
CORPORATION FOR COMPENSATION FOR SERVICES RENDERED  
AND REIMBURSEMENT OF EXPENSES AS CONSULTANT TO ERIC GREEN,  
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1. ARPC was employed under a general retainer to represent Eric Green as Future Claimants' Representative in connection with this case, pursuant to an Order dated November 18, 2003, effective as of September 23, 2003. The Order authorized ARPC to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.



## COMPENSATION PAID AND ITS SOURCE

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3. During the period covered by this Application, ARPC 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 ARPC 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 October 1, 2004 through and including October 19, 2004 showing the amount of \$4,146.25 due for fees.

## SUMMARY OF SERVICES RENDERED

5. The professionals of ARPC who have rendered professional services in this case during the Fee Period are Thomas Florence, Gary Wingo, Jean Malone, Marc Scarcella and LanYue.

6. The services rendered by ARPC during the Fee Period are grouped into the categories set forth in Exhibit A. The partners and consultants 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. ARPC has incurred no out-of-pocket disbursements during the Fee Period.

## VALUATION OF SERVICES

8. Consultants of ARPC have expended a total of 10.90 hours in connection with this matter during the Fee Period.

9. The amount of time spent by each of these persons providing services to the Future Claimants' Representative for the Fee Period is fully set forth in Exhibit A attached hereto. These are ARPC's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by ARPC for the Fee Period in these cases under Chapter 11 is \$4,146.25.

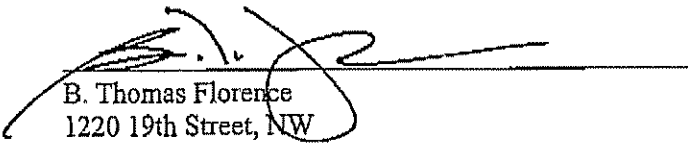
10. ARPC believes that the time entries included in Exhibit A attached hereto are in compliance with the requirements of Local Rule 2016-2.

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, ARPC requests that allowance be made to it in the sum of \$4,146.25 as compensation for necessary professional services rendered to the Committee for the Fee Period, and the sum of \$0.00 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: November 23, 2004

Analysis, Research, Planning Corporation




B. Thomas Florence  
1220 19th Street, NW  
Suite 700  
Washington, DC 20036  
(202) 721-0921

VERIFICATION

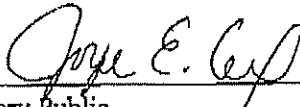
DISTRICT OF COLUMBIA )  
 )  
 ) SS:

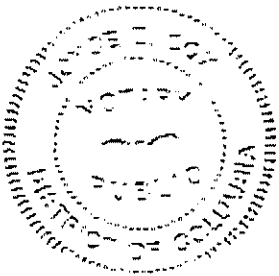
B. Thomas Florence, after being duly sworn according to law, deposes and says:

1. I am President of the applicant firm, Analysis, Research, and Planning Corporation.
2. I have personally performed many of the services rendered by ARPC and am thoroughly familiar with all other work performed on behalf of the Futures Representative by the professionals in the Firm. All of the services set forth in the Application were necessary to faithfully meet my responsibilities as consultant to the Futures Representative. In my experience, this rate is consistent with the rates charged by other professionals who provide similar services. Moreover, my hourly rate has been approved in numerous bankruptcy cases.
3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.

  
B. THOMAS FLORENCE

SWORN TO AND SUBSCRIBED before me this 23 day of November, 2004.

  
Notary Public  
My commission expires: 12-14-2006  
Joyce E. Cox  
Notary Public, District of Columbia  
My Commission Expires 12-14-2006



# Exhibit A



analysis•research•planning  
1220 19th Street, NW, Suite 700  
Washington, D.C. 20036  
Phone: (202) 797-1111  
Fax: (202) 797-3619

Date	Invoice #
11/22/2004	1218

**Client**

Timothy P. Cairns  
Young Conaway Stargatt & Taylor, LLP  
The Brandywine Building  
1000 West Street, 17th Floor  
Wilmington, Delaware 19801

For professional services rendered by ARPC for the billing period of 10/01/04 to 10/19/04

Activities in general include meetings and conference calls, review and analysis of data, preparation of analysis for negotiation and mediation, and other analyses requested. Detailed summary by employee is attached.

Project: <b>METCOIL</b>			
Employee	Billable Hours	Rate	Total
GARY WINGO	2.25	385.00	866.25
JEAN MALONE	2.40	275.00	660.00
LAN YUE	1.00	205.00	205.00
MARC SCARCELLA	0.75	250.00	187.50
TOM FLORENCE (SEPTEMBER 04) *	3.20	495.00	1,584.00
TOM FLORENCE (OCTOBER 04)	1.30	495.00	643.50
Total Professional Fees			4,146.25
Total Expenses			-
Total Professional Fees and Expenses			4,146.25

\* Tom Florence's September time was not billed in the previous September 04 invoice.

If you have any questions about this invoice, please call Lan Yue at (202)797-1111. Thank you.

## LIST OF PROFESSIONALS CONTRIBUTING SERVICES

<u>Name of Individual</u>	<u>Initials Title</u>	<u>Years Exp.</u>	<u>Hourly Rate</u>	<u>Education</u>	<u>Mini-Bio</u>
B. Thomas Florence	BTF Partner and Presid	26	\$495	Ph.D. in Research Design and Statistics from Michigan State University	Dr. Florence has significant experience in litigation consulting, class action and mass tort case management, toxic tort evaluation, environmental risk assessment, large-scale statistical modeling and work flow design and computerization. Prior to joining ARPC, Mr. Florence was the partner of KPMG Peat Marwick LLP.
Gary Wingo	GW Partner	21	\$385	B.S. in Electrical Engineering from US Military Academy; M.S. in Management from Massachusetts Institute of Technology	Mr. Wingo has extensive experience in applying analytical expertise to both litigation and business challenges. Mr. Wingo was president of TechnologyNet, Inc. and VP of Ingram Micro, Inc.
Jean Malone	JEM Sr. Consultant	18	\$275	Ph.D. and M.A. in Sociology from State University of New York at Stony Brook	Ms. Malone has strong expertise in survey design, statistical analysis, and project management. Prior to joining ARPC, Dr. Malone was a consultant with PricewaterhouseCoopers and was Assistant Professor of Sociology at the University of North Carolina at Greensboro..
Marc Scarcella	MS Sr. Consultant	3	\$250	M.A. in Economics from American University	Previously Mr. Scarcella was a quantitative analyst with Claims Resolution Management Corporation - a subsidiary of Manville Asbestos Trust.
Lan Yue	LY Controller	5	\$205	M.A. in Financial Management from the Catholic University of America	Prior to joining ARPC, Ms. Yue was a financial accountant with E.spire Communications.

**METCOIL Project**  
**Summary of Staff Time (10/01/04 to 10/19/04)**

**Task : Cash Flow Modeling and Analysis**

Employee	Hours	Rate	Total
GARY WINGO	2.25	385.00	866.25
MARC SCARCELLA	0.75	250.00	187.50

**Task : Plan and Claim Resolution Procedures**

Employee	Hours	Rate	Total
JEAN MALONE	2.40	275.00	660.00
TOM FLORENCE	4.50	495.00	2,227.50

**Task : Fee Applications, Applicant**

Employee	Hours	Rate	Total
LAN YUE	1.00	205.00	205.00

<b>TOTAL AMOUNT</b>			<b>4,146.25</b>
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**METCOIL Project**

**Details of Staff Time (10/01/04 to 10/19/04)**

Task Cash Flow Modeling and Analysis			
Employee	Date	Hours	Description
GARY WINGO	10/1/2004	2.25	Finalized Trust fund budget analysis for L. Fitzpatrick using claims data and last version of termsheet for cap provision
MARC SCARCELLA	10/1/2004	0.75	Updated the most recent expense model with an additional interactive feature that allows for the aggregate PV expense cap to be adjusted.
<b>Total for Task-</b>		<b>3.00</b>	

Task Plan and Claim Resolution Procedures			
Employee	Date	Hours	Description
TOM FLORENCE	9/29/2004	1.10	Funding issues w/J. Malone and Tim
TOM FLORENCE	9/30/2004	2.10	Administrative budget prep
TOM FLORENCE	10/1/2004	1.30	Continue with the administrative budget prep
JEAN MALONE	10/14/2004	2.40	Research and respond to query by Tim Cairns about properties
<b>Total for Task-</b>		<b>6.90</b>	

Task Fee Applications, Applicant			
Employee	Date	Hours	Description
LAN YUE	10/6/2004	1.00	Spent 4.6h preparing the July and August 04 fee applications
<b>Total for Task-</b>		<b>1.00</b>	

**Total Hours 10.90**

**File a Motion:**03-12676-MFW MET-COIL SYSTEMS (f/k/a MET-COIL SYSTEMS CORPORATI**U.S. Bankruptcy Court****District of Delaware**

## Notice of Electronic Filing

The following transaction was received from Cairns, Timothy Patrick entered on 11/23/2004 at 3:13 PM EST and filed on 11/23/2004

**Case Name:** MET-COIL SYSTEMS (f/k/a MET-COIL SYSTEMS

**Case Number:** 03-12676-MFW

**Document Number:** 1443

**Docket Text:**

Monthly Application for Compensation (*Thirteenth*) of Analysis Research & Planning Corporation, consultants to Eric Green, Legal Representative for Future Claimants for October 2004 Filed by Analysis Research & Planning Corporation. Objections due by 12/13/2004.. (Cairns, Timothy)

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**N:\Bankruptcy\Met-Coil Systems\To Be Filed\ARPC 13th App Oct 04.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=983460418 [Date=11/23/2004] [FileNumber=3197635-0]  
] [3580fb3b7c15c2d20c347691cff0b9a31229a4c24bbc0f3fe94318c86b7ce554571  
fc9eae6bec9de7e9831880f5bb6a66c6f40a840dc88944e9b742853835fc1]]

**03-12676-MFW Notice will be electronically mailed to:**

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William E. Chipman Jr. bankruptcydel@gtlaw.com