

**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. )  
) **Objections Due by: January 20, 2004 at 4:00 p.m.**

**SECOND APPLICATION OF YOUNG CONAWAY STARGATT & TAYLOR, LLP FOR  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES AS COUNSEL TO ERIC GREEN, LEGAL REPRESENTATIVE FOR  
FUTURE CLAIMANTS FOR THE PERIOD FROM NOVEMBER 1, 2003 THROUGH  
NOVEMBER 30, 2003**

Name of Applicant: Young Conaway Stargatt & Taylor, LLP

Authorized to Provide  
Professional Services to: Counsel for 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: November 1, 2003 through  
November 30, 2003

Amount of Compensation sought as  
actual, reasonable and necessary: \$28,620.50

Amount of Expense Reimbursement sought  
as actual, reasonable and necessary: \$3,167.64

This is an:  interim  final application

This application includes 1.00 hours of time with a value of \$172.00 for time incurred in connection with the preparation of interim fee applications.

Prior Applications:

			Requested		Paid	
	Date Filed	Period Covered	Fees	Expenses	Fees	Expenses
1	11/26/2003	9/10/2003 – 10/31/2003	\$66,097.50	\$4,710.19	Pending	Pending

**ATTACHMENT B TO FEE APPLICATION**

<b>Name of Professional Person</b>	<b>Position of the Applicant, Number of Years in that Position, Prior Relevant Experience, Year of Obtaining License to Practice, Area of Expertise</b>	<b>Hourly Billing Rate (including changes)</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
James L. Patton, Jr.	Partner since 1989. Joined firm as associate in 1983. Member Del. Bar since 1983.	\$510.00	9.50	\$4,845.00
Anthony G. Flynn	Partner since 1988. Joined firm as an associate in 1979. Member of DE Bar since 1977.	\$375.00	12.70	\$4,762.50
Edwin J. Harron	Partner since 2003. Joined firm as an associate in 1996. Member of DE Bar since 1995.	\$375.00	22.20	\$8,325.00
Sharon M. Zieg	Joined the firm as an associate in 2000. Member of the NC Bar since 2000 and DE since 2002.	\$265.00	0.60	\$159.00
Timothy P. Cairns	Joined the firm as an associate in 2002. Member of DE Bar since 2002	\$205.00	28.70	\$5,883.50
Sean T. Greecher	Will be admitted to DE Bar in January 2004.	\$190.00	19.80	\$3,762.00
Stephanie Warren	Paralegal 1 year.	\$95.00	8.60	\$817.00
Patsy Petlock	Clerk.	\$35.00	0.60	\$21.00
Amy Lucey	Clerk	\$35.00	0.50	\$17.50
Annie Gray	Clerk	\$35.00	0.30	\$10.50
Leigh C. Paradise	Clerk	\$35.00	0.20	7.00
Lisa Talley	Clerk	\$35.00	0.30	\$10.50
Grand Total:			104.00	\$28,620.50
Blended Rate:			\$275.20 / hour	

### COMPENSATION BY PROJECT CATEGORY

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration (1001)	6.00	\$502.50
Court Hearings (1002)	1.30	\$436.50
Claims Analysis, Objections & Resolutions (1007)	2.70	\$723.50
Meetings (1008)	37.90	\$11,978.50
Other Adversary Proceedings (1011)	24.80	\$5,712.00
Plan & Disclosure Statement (1012)	18.60	\$6,936.00
Asset Analysis (1016)	0.20	\$75.00
Retention of Professionals / Fee Issues (1017)	7.00	\$975.00
Fee Application Preparation – Met-Coil (1018)	1.00	\$172.00
Travel (1019)	4.50	\$1,109.50
<b>TOTAL</b>	<b>104.00</b>	<b>\$28,620.50</b>

### EXPENSE SUMMARY

<b>Expenses Category</b>	<b>Total Expenses</b>
Computerized Legal Research	\$640.19
Conference	\$47.26
Delivery –Parcels, Inc.	\$92.50
Facsimile	\$16.78
Federal Express	\$51.52
Hotel/Lodging	\$155.18
Long Distance Telephone	\$957.96
Photocopy Charges (@15¢ per page)	\$956.40
Postage	\$236.10
Working Meals	\$13.75
<b>TOTAL</b>	<b>\$3,167.64</b>

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FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
	)	Case No. 03-12676 (MFW)
MET-COIL SYSTEMS CORPORATION,	)	
	)	
Debtor.	)	
	)	Objections Due by: January 20, 2004 at 4:00 p.m.

**SECOND APPLICATION OF YOUNG CONAWAY STARGATT & TAYLOR, LLP  
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, the law firm of Young Conaway Stargatt & Taylor, LLP (hereinafter "YCS&T") hereby moves this Court for reasonable compensation for professional legal services rendered as counsel to Eric Green, Legal Representative of Future Claimants (the "Future Claimants' Representative") in the amount of \$28,620.50 together with reimbursement for actual and necessary expenses incurred in the amount of \$3,167.64 for the period commencing November 1, 2003 through and including November 30, 2003 (the "Fee Period"). In support of its Application, YCS&T respectfully represents as follows:

1. YCS&T 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 October 20, 2003, effective as of September 10, 2003. The Order authorized YCS&T 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 YCS&T 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, YCS&T 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 YCS&T 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 November 1, 2003 through November 30, 2003, showing the amount of \$28,620.50 due for fees.

## SUMMARY OF SERVICES RENDERED

5. The attorneys of YCS&T who have rendered professional services in this case during the Fee Period are James L. Patton, Anthony G. Flynn, Edwin J. Harron, Sharon M. Zieg, Timothy P. Cairns and Sean T. Greecher. Paraprofessional services were provided by Stephanie Warren. Case Management services were provided by Amy Lucey, Lisa Talley, Leigh C. Paradise, Annie Gray and Patsy Petlock.

6. The services rendered by YCS&T during the Fee Period are grouped into the categories set forth in Exhibit A. The attorneys and paralegals 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. YCS&T has incurred out-of-pocket disbursements during the Fee Period in the amount of \$3,167.64. This disbursement sum is broken down into categories of charges, including, among other things, computerized legal research, 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.

8. Costs incurred for staff overtime are not included in YCS&T's normal hourly billing rates and, therefore, are itemized and included in YCS&T's disbursements. Pursuant to Local Rule 2016-2, YCS&T represents that its rate for duplication is \$.15 per page, its rate for outgoing telecopier transmissions is \$1.00 per page (excluding related long distance transmission charges), there is no charge for incoming telecopier transmissions and there is no surcharge for computerized research.

### VALUATION OF SERVICES

9. Attorneys and paraprofessionals of YCS&T have expended a total of 104.00 hours in connection with this matter during the Fee Period.

10. 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 YCS&T's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by YCS&T for the Fee Period as co-counsel in these cases under Chapter 11 is \$28,620.50.

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

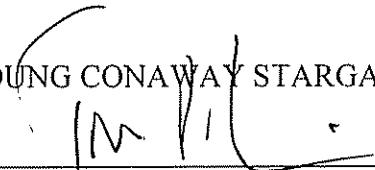


12. In accordance with the factors enumerated in 11 U.S.C. § 330, the amount requested is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other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

WHEREFORE, YCS&T requests that allowance be made to it in the sum of \$28,620.50 as compensation for necessary professional services rendered to the Future Claimants' Representative for the Fee Period, and the sum of \$3,167.64 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: December 31, 2003

YOUNG CONAWAY STARGATT & TAYLOR, LLP



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James L. Patton (No. 2202)  
Edwin J. Harron (No. 3396)  
Timothy P. Cairns (No. 4185)  
The Brandywine Building  
1000 West Street, 17<sup>th</sup> Floor  
P.O. Box 391  
Wilmington, Delaware 19899-0391

Counsel to Eric Green, Legal Representative for Future Claimants

VERIFICATION

STATE OF DELAWARE    )  
                                  )  
NEW CASTLE COUNTY    )        SS:

Edwin J. Harron, Esquire, after being duly sworn according to law, deposes and says:

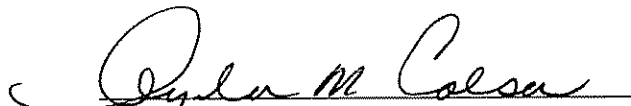
1.       I am partner of the applicant firm, Young Conaway Stargatt & Taylor, LLP, and have been admitted to the bar of the Supreme Court of Delaware since 1995.

2.       I have personally performed many of the legal services rendered by Young Conaway Stargatt & Taylor, LLP, as Counsel to Eric Green, Legal Representative for Future Claimants and am thoroughly familiar with all other work performed on behalf of the Committee by the lawyers and paraprofessionals in the firm.

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

  
\_\_\_\_\_  
Edwin J. Harron

SWORN TO AND SUBSCRIBED before me this 31<sup>st</sup> day of December 03.

  
\_\_\_\_\_  
Notary Public  
My commission expires: \_\_\_\_\_

ANGELA M. COLSON  
NOTARY PUBLIC  
STATE OF DELAWARE  
My Commission Expires Aug. 31, 2007