

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: March 2, 2004 at 4:00 p.m.**

**FIRST 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 7, 2003 THROUGH OCTOBER 31, 2003**

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 7, 2003 through October 31, 2003

Amount of Compensation sought as actual, reasonable and necessary: \$64,429.00

Amount of Expense Reimbursement sought as actual, reasonable and necessary: \$0

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	N/A	N/A	N/A	N/A	N/A	N/A

ATTACHMENT B TO FEE APPLICATION

Name of Individual	Title	Mini-Bio	Years Exp.	Hourly Rate	Total Billed Hours	Total Compensation
B. Thomas Florence	Partner and President	Prior to joining ARPC, Mr. Florence was the partner of KPMG Peat Marwick LLP.	25	\$450	67.90	\$30,5550.00
Gary Wingo	Partner	Mr. Wingo was president of TechnologyNet, Inc. and VP of Ingram Micro, Inc.	20	\$350	2.4	\$840.00
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	\$250	111.80	\$27,950.00
Charlie Bailey	Consultant	Previously Mr. Bailey was a paralegal with Federal Trade Commission and Lawcorps Corporation.	2	\$185	9.9	\$1,831.50
Jennifer Rubentahl	Consultant	Prior to joining ARPC, Ms. Rubenstahl was a configuration management specialist with Computer Science Corporation.	3	\$185	6.50	\$3,052.50
Robin Rozicer	Analyst	Previously Ms. Rozicer was a paralegal with Sonosky, Chambers, Sachse, Endreson & Perry LLP.	2	\$125	1.60	\$200.00
Grand Total					210.10	\$64,429.00
Blended Rate						\$306.66/hours

COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees
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)	195.10	\$58,759.00
Meetings (1008)	15.00	\$5,670.00
Other Adversary Proceedings (1011)	0.00	\$0.00
Plan & Disclosure Statement (1012)	0.00	\$0.00
Asset Analysis (1016)	0.00	\$0.00
Retention of Professionals / Fee Issues (1017)	0.00	\$0.00
Travel (1019)	0.00	\$0.00
TOTAL	210.10	\$64,429.00

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	\$0.00
Parking	\$0.00
Photocopy Charges (@15¢ per page)	\$0.00
Postage	\$0.00
Travel	\$0.00
Working Meals	\$0.00
TOTAL	\$0.00

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AND REIMBURSEMENT OF EXPENSES AS CONSULTANT TO ERIC GREEN,
LEGAL REPRESENTATIVE FOR FUTURE CLAIMANTS FOR THE
PERIOD FROM OCTOBER 7, 2003 THROUGH OCTOBER 31, 2003**

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 \$64,429.00 together with reimbursement for actual and necessary expenses incurred in the amount of \$0 for the period commencing October 7, 2003 through and including October 31, 2003 (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 October 7, 2003 through October 31, 2003 showing the amount of \$64,429.00 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 B. Thomas Florence, Gary Wingo, Jean Malone, Charlie Bailey, Jennifer Rubenstahl 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 no out-of-pocket disbursements or expenses during the Fee Period.

VALUATION OF SERVICES

8. Consultants of ARPC have expended a total of 210.10 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 \$64,429.00.

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

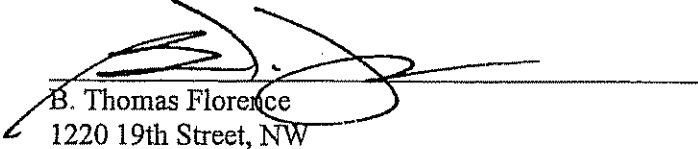
11. In accordance with the factors enumerated in 11 U.S.C. § 330, the amount requested is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other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

WHEREFORE, ARPC requests that allowance be made to it in the sum of \$64,429.00 as compensation for necessary professional services rendered to the Committee for the Fee Period, and the sum of \$0 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: February 11, 2004

Analysis, Research, Planning Corporation



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

VERIFICATION

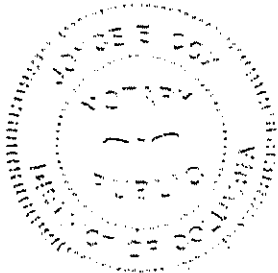
DISTRICT OF COLUMBIA)
) SS:
)

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 all of the services set forth in the Application. All of the services set forth in the Application were necessary to faithfully meet my responsibilities as consultant to the Futures Representative. My hourly rate, as set forth in the Application, is the customary rate I charge for services of this nature. 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 11 day of February 04.



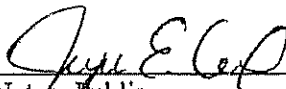

Notary Public
My commission expires: 12-14-06
Joyce E. Cox
Notary Public, District of Columbia
My Commission Expires 12-14-2006

Exhibit A

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

December 23, 2004
RE: Metcoil
Invoice: 215-01

For professional services rendered by Analysis.Research.Planning Corp. (ARPC)
during the month of **October 2003**.

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

	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Tom Florence	67.90	\$ 450	\$ 30,555.00
Gary Wingo	2.40	\$ 350	\$ 840.00
Jean Malone	111.80	\$ 250	\$ 27,950.00
Charlie Bailey	9.90	\$ 185	\$ 1,831.50
Jennifer Rubenstahl	16.50	\$ 185	\$ 3,052.50
Robin Rozicer	1.60	\$ 125	\$ 200.00
Total Professional Fees			\$ 64,429.00
Total Expenses			\$ -
Total Professional Fees and Expenses			\$ 64,429.00

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

Metcoil
Summary of October 2003 Staff Time

Task:	Meetings and conference calls	Hours	Rate	Total
	Tom Florence	9.60	\$450.00	\$4,320.00
	Jean Malone	5.40	\$250.00	\$1,350.00
	<i>Total for task</i>			<u>\$5,670.00</u>
Task:	Review of the case documents and materials	Hours	Rate	Total
	Tom Florence	4.70	\$450.00	\$2,115.00
	Jean Malone	106.40	\$250.00	\$26,600.00
	Robin Rozicer	1.60	\$125.00	\$200.00
	<i>Total for task</i>			<u>\$28,915.00</u>
Task:	Preparation of claim databases and claim analysis	Hours	Rate	Total
	Tom Florence	8.60	\$450.00	\$3,870.00
	Gary Wingo	2.40	\$350.00	\$840.00
	Charlie Bailey	9.90	\$185.00	\$1,831.50
	Jennifer Rubenstahl	16.50	\$185.00	\$3,052.50
	<i>Total for task</i>			<u>\$9,594.00</u>
Task:	Claim forecast	Hours	Rate	Total
	Tom Florence	45.00	\$450.00	\$20,250.00
	<i>Total for task</i>			<u>\$20,250.00</u>
TOTAL AMOUNT				<u>\$64,429.00</u>

**Metcoil
Details of October 2003 Staff Time**

Meetings and conference calls			
Date	Hours	Description	
Tom Florence	10/07/03	2.5 Initial mtg and briefing by counsel	
Tom Florence	10/08/03	1.2 Call w/Allen re:epidemiology and expert requirements	
Tom Florence	10/10/03	1.1 Conf c w/Team re: methods and experts	
Tom Florence	10/15/03	1.0 Conf call w/Team re: methods and status	
Tom Florence	10/20/03	0.5 Conf Call w/team re: hydrogeological; results and risk representations	
Tom Florence	10/23/03	1.3 Conf Call w/team re: continue the discusson on hydrogeological; results and risk representations	
Jean Malone	10/23/03	1.3 Conference call re: hydrogeological, results and risk representations	
Tom Florence	10/24/03	1.5 Conf Call w/team re: Results and risk representations	
Tom Florence	10/27/03	0.5 Conf Call w/team re: hydrogeological	
Jean Malone	10/29/03	2.3 Conference call and summaries	
Jean Malone	10/31/03	1.8 Conference call re: sykes report, and review of issues.	
<i>Total for task</i>		<u>15.0</u>	
Review of the case documents and materials			
Date	Hours	Description	
Jean Malone	10/08/03	7.1 Review materials and web research on TCE and Lisle, III. Site	
Jean Malone	10/15/03	3.8 Research census demos and other sources for Lisle	
Jean Malone	10/16/03	7.8 Mapping solutions (MapInfo, ArcView) given probable data sources	
Jean Malone	10/17/03	5.8 Mapping solutions (Maptitude)	
Robin Roazier	10/07/03	1.6 Review the existing investigative research for errors	
Tom Florence	10/20/03	4.7 Review and prepare property database	
Jean Malone	10/20/03	2.6 Prepare material for Tom's conference call and review with T. Florence	
Jean Malone	10/21/03	5.7 Map out Syke's CDs and open Access, Excel files	
Jean Malone	10/22/03	8.3 Map out aerial maps and associated files; query coordinates	
Jean Malone	10/23/03	9.2 Preliminary judgement of how CD files are associated	
Jean Malone	10/24/03	10.6 Use MapInfo to open CD files and explore	
Jean Malone	10/26/03	5.3 Review files and organize with agenda for meeting with Spatial Insights	
Jean Malone	10/27/03	3.7 Meeting with Spatial Insights to review mapping alternatives and data sources	
Jean Malone	10/27/03	1.4 Prepare questions for meeting with Spatial Insights	
Jean Malone	10/27/03	1.7 Review tables created with Spatial Insights	
Jean Malone	10/28/03	1.3 Explore sources for well data.	
Jean Malone	10/28/03	0.9 Get estimates for HH level data.	
Jean Malone	10/28/03	7.2 Review new Sykes transmissions and compare with previous transmissions.	
Jean Malone	10/29/03	3.4 Investigate additional census availability	
Jean Malone	10/29/03	5.0 Prepare dataset for household level appending.	
Jean Malone	10/29/03	0.6 Quotes and other info from vendors.	
Jean Malone	10/30/03	3.3 Investigate potential sources for well histories.	
Jean Malone	10/30/03	4.9 Map out the TCE well areas on ARPC system in preparation for census and other attachments.	
Jean Malone	10/31/03	2.9 Prepare data and layout for Clartas append.	

Jean Malone 10/31/03 3.9 Review Sykes reports, compare with our data, and prepare requests for additional information.
Total for task 112.7

Task:	Date	Hours	Description
Preparation of claim databases and claim analysis			
Jennifer Rubenstahl	10/21/2003	5.4	Investigate MapInfo for Jean
Tom Florence	10/21/2003	2.3	Continue to review and prepare property database
Jennifer Rubenstahl	10/22/2003	2.6	Continue with the investigate MapInfo for Jean
Tom Florence	10/22/2003	6.3	Review and prepare property database
Gary Wingo	10/24/2003	1.6	Review and design of analysis logic for spatial evaluation of claim
Gary Wingo	10/24/2003	0.8	Wrote/sent NDA form to Spatial Insights for GIS assistance
Jennifer Rubenstahl	10/29/2003	4.3	MapInfo - Dupage County
Jennifer Rubenstahl	10/30/2003	4.2	Continue to search MapInfo - Dupage County
Charlie Bailey	10/31/2003	9.9	determined census block for desired areas
<i>Total for task</i>		<u>37.4</u>	

Task:	Date	Hours	Description
Claim forecast			
Tom Florence	10/23/2003	7.3	Review settlement values in similar cases (Part 1)
Tom Florence	10/24/2003	8.3	Continue to review settlement values in similar cases (Part II)
Tom Florence	10/28/2003	5.7	Review settlement values in similar cases (Review III)
Tom Florence	10/29/2003	8.7	Review health effects research for forecast methodology
Tom Florence	10/30/2003	7.8	Analysis of property and well data
Tom Florence	10/31/2003	7.2	Research on claim values and property selection
<i>Total for task</i>		<u>45.0</u>	

TOTAL HOURS 210.1

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 President	25	\$450	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	20	\$350	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	17	\$250	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..
Charlie Bailey	CB	Consultant	2	\$185	B.A. in Economics and Minor in Psychology from Hobart and William Smith Colleges	Previously Mr. Bailey was a paralegal with Federal Trade Commission an Lawcorps Corporation.
Jennifer Rubentahl	JR	Consultant	3	\$185	B.S. in Mathematics and Minor in Computer Science from Salisbury University	Prior to joining ARPC, Ms. Rubentahl was a configuration management specialist with Computer Science Corporation.

Robin Rozicer RR Analyst 2 \$125 E.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.