

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: March 11, 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 **Third Application of Analysis Research & Planning Corporation for Compensation for Services Rendered and Reimbursement of Expenses for the Period from December 1, 2003 through December 31, 2003** (the "Application"). The Application seeks fees in the amount of \$65,780.50 and expenses in the amount of \$2,587.89.

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 **March 11, 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  
February 20, 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  
)  
)  
MET- COIL SYSTEMS CORPORATION, ) Case No. 03-12676 (MFW)  
)  
)  
Debtor. ) **Objections Due: March 10, 2004 at 4:00 p.m.**

**THIRD 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 DECEMBER 1, 2003 THROUGH DECEMBER 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: December 1, 2003 through  
December 31, 2003

Amount of Compensation sought as  
actual, reasonable and necessary: \$65,780.50

Amount of Expense Reimbursement sought  
as actual, reasonable and necessary: \$2,587.89

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

This application includes 3.30 hours of time with a value of \$610.50 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	Pending	Pending
2	02/11/04	11/01/03 – 11/30/03	\$88,270.50	\$1,548.92	Pending	Pending
3						

**ATTACHMENT B TO FEE APPLICATION**

<u>Name of Individual</u>	<u>Title</u>	<u>Mini-Bio</u>	<u>Years Exp.</u>	<u>Hourly Rate</u>	<u>Total Billed Hours</u>	<u>Total Compensation</u>
B. Thomas Florence	Partner and President	Prior to joining ARPC, Mr. Florence was the partner of KPMG Peat Marwick LLP.	25	\$450	65.90	\$29,655.00
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	104.30	\$26,075.00
Marc Scarcella	Sr. Consultant	Previously Mr. Scarcella was a quantitative analyst with Claims Resolution Management Corporation - a subsidiary of Manville Asbestos Trust.	2	\$225.00	10.9	\$2,452.50
Lan Yue	Controller	Prior to joining ARPC, Ms. Yue was a financial accountant with E.spire Communications.	4	\$185	3.3	\$610.50
Robin Rozicer	Analyst	Previously Ms. Rozicer was a paralegal with Sonosky, Chambers, Sachse, Endreson & Perry LLP.	2	\$125	55.90	\$6,987.50
<b>Grand Total</b>					<b>240.30</b>	<b>\$65,780.50</b>
<b>Blended Rate</b>						<b>\$273.74/hours</b>

**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)	206.90	\$51,625.00
Meetings (1008)	30.10	\$13,545.00
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)	3.30	\$610.50
Travel (1019)	0.00	\$0.00
<b>TOTAL</b>	<b>240.30</b>	<b>\$65,780.50</b>

### EXPENSE SUMMARY

Expenses Category	Total Expenses
Research and Publications	\$1,975.88
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	\$612.01
Working Meals	\$0.00
<b>TOTAL</b>	<b>\$2,587.89</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: March 10, 2004 at 4:00 p.m.

**THIRD 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 DECEMBER 1, 2003 THROUGH DECEMBER 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 \$65,780.50 together with reimbursement for actual and necessary expenses incurred in the amount of \$2,587.89 for the period commencing December 1, 2003 through and including December 31, 2003 (the "Fee Period"). In support of its Application, ARPC Inc. 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 December 1, 2003 through December 31, 2003 showing the amount of \$65,780.50 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 B. Thomas Florence, Jean Malone, Marc Scarcella, Lan Yue, 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 \$2,587.89. 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 240.30 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 \$65,780.50.

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

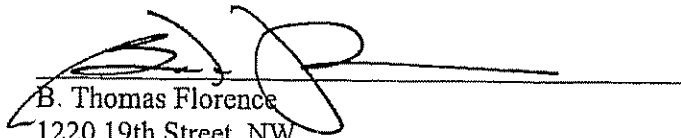
11. In accordance with the factors enumerated in 11 U.S.C. § 330, the amount requested is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other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

WHEREFORE, ARPC requests that allowance be made to it in the sum of \$65,780.50 as compensation for necessary professional services rendered to the Committee for the Fee Period, and the sum of \$2,587.89 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: February 20, 2004

Analysis, Research, Planning Corporation

A handwritten signature in black ink, appearing to read 'B. Thomas Florence', is written over a horizontal line. The signature is stylized and somewhat cursive.

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:

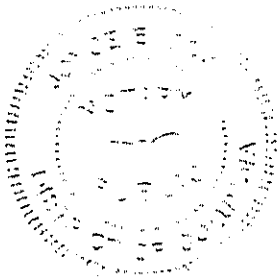
1. I am President of the applicant firm, Analysis, Research, and Planning Corporation.

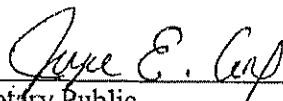
2. I have personally performed all of the services set forth in the Application. All of the services set forth in the Application were necessary to faithfully meet my responsibilities as consultant to the Futures Representative. My hourly rate, as set forth in the Application, is the customary rate I 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 20 day of February 04.



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

February 18, 2004  
RE: Metcoil  
Invoice: 215-03

For professional services rendered by Analysis.Research.Planning Corp. (ARPC)  
during the month of **December 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	65.90	\$ 450	\$ 29,655.00
Jean Malone	104.30	\$ 250	\$ 26,075.00
Marc Scarcella	10.90	\$ 225	\$ 2,452.50
Lan Yue	3.30	\$ 185	\$ 610.50
Robin Rozicer	55.90	\$ 125	\$ 6,987.50
Total Professional Fees			\$ 65,780.50
Total Expenses			\$ 2,587.89
<b>Total Professional Fees and Expenses</b>			<b>\$ 68,368.39</b>

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

**Metcoil**  
**Summary of December 2003 Staff Time**

Task:	Meetings and conference calls	Hours	Rate	Total
	Tom Florence	30.10	\$450.00	\$13,545.00
	<i>Total for task</i>			<u>\$13,545.00</u>
Task:	Review of the case documents and materials	Hours	Rate	Total
	Robin Rozicer	55.90	\$125.00	\$6,987.50
	<i>Total for task</i>			<u>\$6,987.50</u>
Task:	Preparation of claim databases, claim analysis and objections and/or POC	Hours	Rate	Total
	Tom Florence	16.00	\$450.00	\$7,200.00
	Marc Sacarella	10.90	\$225.00	\$2,452.50
	<i>Total for task</i>			<u>\$9,652.50</u>
Task:	Claim forecast	Hours	Rate	Total
	Tom Florence	5.20	\$450.00	\$2,340.00
	Jean Malone	104.30	\$250.00	\$26,075.00
	<i>Total for task</i>			<u>\$28,415.00</u>
Task:	Plan and Claim Resolution Procedures	Hours	Rate	Total
	Tom Florence	14.60	\$450.00	\$6,570.00
	<i>Total for task</i>			<u>\$6,570.00</u>
Task:	Fee Applications	Hours	Rate	Total
	Lan Yue	3.30	\$185.00	\$610.50
	<i>Total for task</i>			<u>\$610.50</u>
<b>TOTAL AMOUNT</b>				<u>\$65,780.50</u>

**Metcoil****Details of December 2003 Staff Time**

Task: Meetings and conference calls		Date	Hours	Description
Tom Florence		12/1/2003	7.60	Mtg and Prep on prelim results of forecast
Tom Florence		12/2/2003	9.30	Mtg and prep w/Team re: proposed plan
Tom Florence		12/4/2003	3.60	Prep analysis for FCR
Tom Florence		12/5/2003	3.80	Prep and mtg w/FCR re: forecasts and costs
Tom Florence		12/14/2003	2.00	Conf c w/Team re: settlement scenarios
Tom Florence		12/15/2003	1.00	Conf c w/Team re: analysis results and values
Tom Florence		12/17/2003	2.80	Conf call and follow-up with MetCoil counsel re: methods and assumptions
<i>Total for task</i>			<u>30.1</u>	
Task: Review of the case documents and materials		Date	Hours	Description
Robin Rozicer		12/1/2003	2.60	Reviewed existing investigative research for errors
Robin Rozicer		12/3/2003	4.90	Continued to examine property research for error in the year property was constructed
Robin Rozicer		12/4/2003	4.20	Called the DuPage County hotline for property listing information to analyze data errors
Robin Rozicer		12/5/2003	7.90	Continued where I left off to call DuPage hotline to cross reference the property info with spreadsheet
Robin Rozicer		12/8/2003	8.10	Conducted research utilizing online databases such as FactFinder
Robin Rozicer		12/9/2003	8.00	Created, proofed and discussed with Jean approval for memorandum
Robin Rozicer		12/10/2004	5.40	Reevaluated my current investigative info error.
Robin Rozicer		12/10/2003	2.10	Began organizing multiple files for DuPage property information
Robin Rozicer		12/11/2003	8.10	Created files for Jean that consisted of DuPage research as well as map info and notes
Robin Rozicer		12/12/2003	4.30	Created files for Jean: correspondence and legal documents
Robin Rozicer		12/15/2003	0.30	Created client files in Word for networ sharing RE: DuPage properties
<i>Total for task</i>			<u>55.9</u>	
Task: Preparation of claim databases, claim analysis and objections and/or POC		Date	Hours	Description
Marc Scarcella		12/3/2003	6.40	I audited all of her files for accuracy and improved upon any of the estimation programming.
Marc Scarcella		12/4/2003	3.70	I continued my audit of the metcoil projection files, methods, and programs.
Tom Florence		12/8/2003	7.60	Reanalysis of population and rates
Marc Scarcella		12/9/2003	0.80	I completed a final audit of Jean's files.
Tom Florence		12/9/2003	2.80	Review of revised cost analysis
Tom Florence		12/11/2003	2.50	Revised analysis for FCR
Tom Florence		12/12/2003	3.10	Continue to revised analysis for FCR
<i>Total for task</i>			<u>26.9</u>	
Task: Claim forecast		Date	Hours	Description
Jean Malone		12/1/2003	4.10	Supervise Cameron with audit of Area A of model.
Jean Malone		12/1/2003	5.40	QC and make changes to maximum age.
Jean Malone		12/2/2003	8.40	Meetings at Willington
Jean Malone		12/2/2003	3.30	Prepare summaries for Wilmington meeting
Jean Malone		12/3/2003	3.20	Prepare, train, supervise for QC of working model and additional building dates

Jean Malone	12/3/2003	3.20	Review and document Cancer procedure
Jean Malone	12/3/2003	2.30	Prepare for QC conference call on SEER data tomorrow
Jean Malone	12/4/2003	2.10	Conference call with Li and Mink
Jean Malone	12/4/2003	3.90	Review material with Robin for property QC
Jean Malone	12/4/2003	2.70	Review audited model from Marc.
Jean Malone	12/5/2003	2.90	Examine competing models for redistributing duration of exposure.
Jean Malone	12/5/2003	5.30	Apply and test best model to back database and front spreadsheet.
Jean Malone	12/7/2003	2.50	Reapportion duration categories.
Jean Malone	12/7/2003	2.90	Re-adjust Tiers according to exponent's analysis.
Jean Malone	12/8/2003	1.40	Preparation for the conference call that settles Cancer sites
Jean Malone	12/8/2003	5.40	Redo models with new decision for male/female separately, with UCL included.
Jean Malone	12/8/2003	2.30	Amend Liability Interactive engine.
Jean Malone	12/9/2003	6.70	Revise for previous endpoints, not just Bladder and Kidney
Jean Malone	12/10/2003	0.90	Revise liability and scenario engines for phone conference.
Jean Malone	12/10/2003	0.40	Supervise work papers development with Robin on properties.
Jean Malone	12/11/2003	2.30	Review process with Tom, Jeff, Tim and send out scenario engines
Jean Malone	12/12/2003	3.20	Revisions to analysis spreadsheet and ad hoc questions, telephone conversations regarding final revisions
Jean Malone	12/14/2003	1.10	Review Mendal's report
Jean Malone	12/14/2003	0.80	Research on skin cancers
Jean Malone	12/14/2003	2.30	Preparation of materials for conference call
Jean Malone	12/14/2003	2.70	Revise estimate in accordance with discussion.
Jean Malone	12/15/2003	7.80	Conference calls about revisions to model; revisions with Lung Cancer for Scenarios N and M and dissemination.
Tom Florence	12/15/2003	5.20	Requested analyses by FCR revaluation
Jean Malone	12/16/2003	3.20	Annotate files for possible sharing
Jean Malone	12/17/2003	1.20	Prep and Conference call with Frank Citera
Jean Malone	12/18/2003	1.80	Prepare DEVCAN summaries for Citera
Jean Malone	12/19/2003	3.30	Methodology write-up
Jean Malone	12/22/2003	5.30	Review TDP draft and comment
<i>Total for task</i>		<u>109.5</u>	
Task:	Plan and Claim Resolution Procedures		Description
	Date	Hours	
Tom Florence	12/22/2003	11.80	Review and revise TDP
Tom Florence	12/23/2003	2.80	Finished reviewing and revising TDP
<i>Total for task</i>		<u>14.6</u>	
Task:	Fee Applications		Description
	Date	Hours	
Lan Yue	12/15/2003	\$3.30	Prepared the October Fee Applications
<i>Total for task</i>		<u>3.3</u>	
<b>TOTAL HOURS</b>		<b>240.3</b>	



**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.
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..
Marc Scarcella	MS	Sr. Consultant	2	\$225	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	4	\$185	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.
Robin Rozicer	RR	Analyst	2	\$125	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.

# Exhibit B

**Metcoil**  
**December Expenses 2003**

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<b>Travel Expenses</b>	<b>Date</b>	<b>Amount</b>	<b>Staff</b>
Train (1/2)	12/3/2003	\$ 105.50	T. Florence
Car (1/2)	12/3/2003	\$ 37.50	T. Florence
Taxi (1/2)	12/3/2003	\$ 5.75	T. Florence
Hotel	12/3/2003	\$ 463.26	T. Florence
<i>Total Travel Expense</i>		<u>\$ 612.01</u>	
<b>Delivery/Other Charges</b>	<b>Date</b>	<b>Amount</b>	<b>Staff</b>
Claritas Data Enhancement	11/10/2003	\$ 1,500.00	J. Malone
Mealey Publications	11/13/2003	\$ 475.88	J. Malone
<i>Total Delivery/Other Expenses</i>		<u>\$ 1,975.88</u>	
<hr/>			
<b>TOTAL EXPENSE</b>		<b>\$ 2,587.89</b>	

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