

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 29, 2004 at 4:00 p.m.**

**NOTICE OF APPLICATION**

TO: The United States Trustee for the District of Delaware, Counsel to the Debtors and all parties requesting notice under Bankruptcy Rule 2002

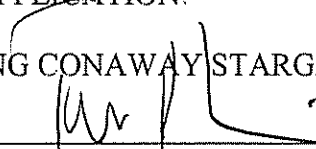
Exponent, Inc., Toxicologists and Epidemiologists to Eric Green, Legal Representative for Future Claimants (the "Future Claimants' Representative"), has filed its **First Application for Compensation for Services Rendered and Reimbursement of Expenses for the Period from October 20, 2003 through October 31, 2003** (the "Application"). The Application seeks fees in the amount of \$18,007.00 and expenses in the amount of \$20.00.

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 **March 29, 2004 at 4:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE THAT PURSUANT TO THE ADMINISTRATIVE ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION & REIMBURSEMENT OF EXPENSES FOR PROFESSIONALS, IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURE, THE DEBTOR WILL BE AUTHORIZED TO PAY 80% OF REQUESTED FEES AND 100% OF REQUESTED EXPENSES WITHOUT FURTHER ORDER OF THE COURT. ONLY IF AN OBJECTION IS PROPERLY AND TIMELY FILED IN ACCORDANCE WITH THE ABOVE PROCEDURE, WILL A HEARING BE HELD ON THE APPLICATION.

Dated: Wilmington, Delaware  
March 9, 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)  
)  
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Debtor. ) **Objection Deadline: March 29, 2004 at 4:00 p.m.**

**FIRST APPLICATION OF EXPONENT, INC. FOR COMPENSATION  
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES  
AS TOXICOLOGISTS AND EPIDEMIOLOGISTS TO ERIC GREEN, LEGAL  
REPRESENTATIVE FOR FUTURE CLAIMANTS FOR THE  
PERIOD FROM OCTOBER 20, 2003 THROUGH OCTOBER 31, 2003**

Name of Applicant: Exponent, Inc.

Authorized to Provide  
Professional Services to: Toxicologists and Epidemiologists for  
Legal Representative for Future Claimants

Date of Retention: Order dated November 18, 2003,  
nunc pro tunc to October 20, 2003

Period for which compensation and  
reimbursement is sought: October 20, 2003 through  
October 31, 2003

Amount of Compensation sought as  
actual, reasonable and necessary: \$18,007.00

Amount of Expense Reimbursement sought  
as actual, reasonable and necessary: \$20.00

This is an:  interim  final application

This application includes 0.00 hours of time with a value of \$0.00 for time incurred in connection with the preparation of interim fee applications.

Prior Applications:

|   |            |                | Requested |          | Approved |          |
|---|------------|----------------|-----------|----------|----------|----------|
|   | Date Filed | Period Covered | Fees      | Expenses | Fees     | Expenses |
| 1 | N/A        | N/A            | N/A       | N/A      | N/A      | N/A      |
|   |            |                |           |          |          |          |
|   |            |                |           |          |          |          |

**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> |
|------------------------------------|---|--|---------------------------|---------------------------|
| Jeffrey Mandel                     | Senior Managing Scientists  | \$350.00                                       | 29.00                     | \$10,150.00               |
| Abby Li                            | Managing Scientists   | \$240.00                                       | 26.70                     | \$6,408.00                |
| John M. Warmerdam                  | Senior Scientists   | \$138.00                                       | 10.00                     | \$1,380.00                |
| Kathleen Lohmann                   | Research Specialist   | \$69.00  | .60                       | \$69.00                   |
| Grand Total:                       |   |  | 66.30                     | \$18,007.00               |
| Blended Rate:                      |   |  | \$271.60 / hour           |                           |

**COMPENSATION BY PROJECT CATEGORY**

| <b>Project Category</b>                     | <b>Total Hours</b> | <b>Total Fees</b>  |
|---|--------------------|--------------------|
| Case Administration (1001)                  | 23.20              | \$6,505.00         |
| Meetings (1008)                             | 16.30              | \$4,902.00         |
| Plan & Disclosure Statement (1012)          | 26.30              | \$6,425.00         |
| Retention of Professional/Fee Issues (1017) | .50                | \$175.00           |
| <b>TOTAL</b>                                | <b>66.30</b>       | <b>\$18,007.00</b> |

### EXPENSE SUMMARY

| Expenses Category                    | Total Expenses |
|--------------------------------------|----------------|
| Travel                               | \$0.00         |
| Well data from Illinois Water Survey | \$0.00         |
| Document Retrieval                   | \$20.00        |
| <b>TOTAL</b>                         | <b>\$20.00</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.                       | ) | Objection Deadline: March 29, 2004 at 4:00 p.m. |

**FIRST APPLICATION OF EXPONENT  
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, Exponent, Inc. (hereinafter "Exponent") hereby moves this Court for reasonable compensation for professional services rendered as toxicologists and epidemiologists to Eric Green, Legal Representative of Future Claimants (the "Future Claimants' Representative") in the amount of \$18,007.00 for the period commencing October 20, 2003 through and including October 31, 2003 (the "Fee Period"). In support of his Application, Exponent respectfully represents as follows:

1. Exponent 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 November 18, 2003, effective as of October 20, 2003. The Order authorized Exponent 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 Exponent 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, Exponent 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 Exponent and any other person 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 20, 2003 through October 31, 2003 showing the amount of \$18,007.00 due for fees.

#### SUMMARY OF SERVICES RENDERED

5. Exponent has rendered professional services in this case during the Fee Period.

6. The services rendered by Exponent during the Fee Period is grouped into the categories set forth in Exhibit A, along with the number of hours and the total compensation sought for each category, in the attachments hereto.

#### VALUATION OF SERVICES

9. Exponent has expended a total of 66.30 hours in connection with this matter during the Fee Period.

10. The amount of time spent by Exponent providing services to the Future Claimants' Representative for the Fee Period is fully set forth in Exhibit A attached hereto. These are Exponent' normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by Exponent for the Fee Period as toxicologists and epidemiologists for Eric Green, Legal Representative of Future Claimants in these cases under Chapter 11 is \$18,007.00.

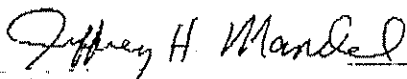


11 Exponent believes that the time entries included in Exhibit A attached hereto are in compliance with the requirements of Local Rule 2016-2.

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, Exponent requests that allowance be made to him in the sum of \$18,007.00 as compensation for necessary professional services rendered to the Future Claimants' Representative for the Fee Period and the sum of \$20.00 for reimbursement of actual necessary costs and expenses incurred during the Fee Period, and further requests such other and further relief as this Court may deem just and proper.

Dated: March 9, 2004

  
\_\_\_\_\_  
Exponent, Inc.

Toxicologists and Epidemiologists to Eric Green, Legal  
Representative for Future Claimants

# Exhibit A

**Met-Coil billing details for Jeffrey H. Mandel, M.D.**

| <u>Date</u> | <u>Description/comment</u>  | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-------------|---|--------------|-------------|---------------|
| 10/20/03    | 0.5 hours (17) finalizing contract<br>0.5 hours (12) development of risk<br>assessment approach<br>0.5 hours (1) review of TCE epidemiology   | 1.5          | \$350       | 525.00        |
| 10/21/03    | 2.0 hours (1) review of legal documents   | 2.0          | \$350       | 700.00        |
| 10/22/03    | 1.1 hours (12) development of risk<br>assessment approach<br>1.1 hours (1) review of legal documents  | 2.2          | \$350       | 770.00        |
| 10/23/03    | 1.3 hours (8) conference call with Doug<br>Allen, Jon Sykes, Ed Harron<br>2.0 hours (1) TCE epidemiology review   | 3.3          | \$350       | 1,155.00      |
| 10/24/03    | 1.5 hours (8) conference call with Doug<br>Allen, Jon Sykes, Ed Harron, Tom<br>Florence<br>1.2 hours (1) TCE epidemiology review<br>1.0 hours (1) Toxicology review w. A. Li                              | 3.7          | \$350       | 1,295.00      |
| 10/27/03    | 1.5 hours (8) conf. Call with A. Li, Tom F.,<br>Jon S., Tim C., Ed H., Doug A.<br>2.8 hours (8) meeting with Doug Allen on<br>10/21/03 in Chicago with Abby Li<br>1.9 hours (12) disease estimates review | 6.2          | \$350       | 2,170.00      |
| 10/28/03    | 0.4 hours (1) discussion on risk assessment<br>with Abby Li<br>1.8 hours (12) establishing disease links<br>to TCE  | 2.2          | \$350       | 770.00        |

Met-Coil billing details for Jeffrey H. Mandel, M.D.

| <u>Date</u> | <u>Description/comment</u>  | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-------------|---|--------------|-------------|---------------|
| 10/29/03    | 2.1 hours (12) develop disease listing<br>associated with TCE<br>1.0 hours (1) work on risk assess. With<br>Abby Li<br>1.5 hours (8) conf. Call with TCE team | 4.6          | \$350       | 1,610.00      |
| 10/30/03    | 1.6 hours (12) develop disease listing  | 1.6          | \$350       | 560.00        |
| 10/31/03    | 0.4 hours (8) discussion w D. Allen<br>1.3 hours (12) develop disease listing   | 1.7          | \$350       | 595.00        |

**JOHN WARMERDAM'S HOURS**

| <u>Date</u> | <u>Description (All work performed under task 12)</u>  | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-------------|--|--------------|-------------|---------------|
| 10/28/2003  | (12) Initial consultation/e-mails with Abby Li.  | 1.2          | 138         | 165.6         |
|             | (12) Discussion of site and nature and extent of contamination.                                    | 1.8          | 138         | 248.4         |
| 10/29/2003  | (12) Discussions/e-mails with Abby Li regarding potential exposure pathways and modeling approach. | 3.0          | 138         | 414           |
| 10/3/2003   | (12) Research into applicability of McKone household exposure model and Jury soil migration model. | 4.0          | 138         | 552           |

MET-COIL LABOR DETAIL FOR ABBY LI

| Date     | Hours | Code | Description   |
|----------|-------|------|---|
| 10/21/03 | 2.5   | 8    | meeting with Doug Allen                               |
|          | 0.5   | 1    | lit review with Jeff                                  |
| 10/22/03 | 1     | 12   | development of risk assessment approach               |
| 10/23/03 | 1.3   | 8    | conference call with Doug Allen, Jon Sykes, Ed Harron |
|          | 2.7   | 1    | lit review  |
| 10/24/03 | 1.5   | 8    | conference call with Doug Allen and others            |
|          | 3.5   | 1    | review of legal and other documents from Doug         |
| 10/26/03 | 3     | 1    | review of legal documents                             |
|          | 3     | 12   | Risk Assessment calculations, powerpoint summary      |
| 10/27/03 | 2     | 8    | conference call/ prep for call                        |
| 10/28/03 | 1.2   | 1    | review e-mails/documents from Doug and team           |
| 10/29/03 | 2     | 12   | Risk Assessment                                       |
|          | 2     | 1    | review of data/documents relevant for risk assessment |
| 10/30/03 | 0.2   | 1    | review of e-mail/documents from Doug and team         |
| 10/31/03 | 0.3   | 1    | review of e-mail/documents from Doug and team         |

Met-Coil Billing Details

| <u>Date</u> | <u>Category</u> | <u>Description/comment</u>                           | <u>Hours</u> | <u>Hourly Rate</u> | <u>Amount</u> |
|-------------|-----------------|--|--------------|--------------------|---------------|
| 10/28/03    | (1)             | Library search for key article<br>(Kathleen Lohmann) | 0.6          | \$115              | \$69          |

# Exhibit B



Exponent, Inc.

Page 1  
11/20/03  
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ASBLDETL

Billing Backup

Project No. CH10555.000 MET-COIL CONSULTATION  
Invoice No. 03379 November 20, 2003

| Date                | EmpNo /Acct | LabCd /Vchr | Name                   | Description/Comment                           | Hours /Qty | Rate        | Billing Amount |
|---------------------|-------------|-------------|------------------------|---|------------|-------------|----------------|
| 10/20/03            | 80077       | B0000       | JEFFREY MANDEL         | .5 (17), .5(12), .5(1)                        | 1.5        | 350.00      | 525.00         |
| 10/21/03            | 80077       | B0000       | MANDEL, JEFFREY        | rev legal doc.(1)                             | 2.0        | 350.00      | 700.00         |
| 10/22/03            | 80077       | B0000       | MANDEL, JEFFREY        | 1.1 (1), 1.1(12)                              | 2.2        | 350.00      | 770.00         |
| 10/23/03            | 80077       | B0000       | MANDEL, JEFFREY        | 1.3 (8), 2(1)                                 | 3.3        | 350.00      | 1,155.00       |
| 10/24/03            | 80077       | B0000       | MANDEL, JEFFREY        | 1(1-A.Li), 1.5(8), 1.2(1)                     | 3.7        | 350.00      | 1,295.00       |
| 10/27/03            | 80077       | B0000       | MANDEL, JEFFREY        | 1.5h (8), 2.8h(8 on 10/21), 1.9h(12)          | 6.2        | 350.00      | 2,170.00       |
| 10/28/03            | 80077       | B0000       | MANDEL, JEFFREY        | 0.4 (1-Abby Li), 1.8(12-dis. est.)            | .8         | 350.00      | 280.00         |
| Managing Scientist  |             |             |                        |   |            |             |                |
| 10/21/03            | 86622       | B0000       | ABBY LI                | Intro meeting with Doug + Jeff discussion     | 2.0        | 240.00      | 720.00         |
| 10/22/03            | 86622       | B0000       | LI, ABBY               |   | 1.0        | 240.00      | 240.00         |
| 10/23/03            | 86622       | B0000       | LI, ABBY               | phone call (2) and review background (2)      | 4.0        | 240.00      | 960.00         |
| 10/24/03            | 86622       | B0000       | LI, ABBY               | phone call and review literature              | 5.0        | 240.00      | 1,200.00       |
| 10/26/03            | 86622       | B0000       | LI, ABBY               | review of ATSDR, EPA -powerpoint, calculation | 6.0        | 240.00      | 1,440.00       |
| 10/27/03            | 86622       | B0000       | LI, ABBY               | conference call                               | 2.0        | 240.00      | 480.00         |
| 10/28/03            | 86622       | B0000       | LI, ABBY               | review e-mails and documents                  | 1.2        | 240.00      | 288.00         |
| 10/28/03            | 86622       | B0000       | LI, ABBY               | 2 hr call, 2 hr data evaluation               | 4.0        | 240.00      | 960.00         |
| 10/30/03            | 86622       | B0000       | LI, ABBY               | review e-mails                                | .2         | 240.00      | 48.00          |
| 10/31/03            | 86622       | B0000       | LI, ABBY               | review emails                                 | .3         | 240.00      | 72.00          |
| Sr Scientist        |             |             |                        |   |            |             |                |
| 10/29/03            | 86528       | B0000       | JOHN M. WARMERDAM,PHD  | cc w/AL, initial model formulation            | 1.2        | 138.00      | 165.60         |
| 10/30/03            | 86528       | B0000       | WARMERDAM,PHD, JOHN    | e-mails, calls, McKone model                  | .8         | 138.00      | 110.40         |
| Research Specialist |             |             |                        |   |            |             |                |
| 10/28/03            | 01498       | B0000       | KATHLEEN S. LOHMANN    | Mandel. Drinking Water doc                    | .6         | 115.00      | 69.00          |
| Totals              |             |             |                        |   | 49.0       |             | 13,648.00      |
| Units               |             |             |                        |   |            | Total labor | 13,648.00      |
| 10/28/03            | 022         |             | LIB Document Retrieval | Mandel. drinking water doc                    | 20.00      | 1.000       | 20.00          |
| Totals this Project |             |             |                        |   |            |             | 13,668.00      |