

**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.	)	

**NOTICE OF AMENDED<sup>1</sup> AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON APRIL 19, 2004 AT 10:30 A.M. (EASTERN TIME)**

**CONTINUED/ADJOURNED/RESOLVED MATTERS:**

1. Motion To Assume Settlement Agreement Or In The Alternative To Approve Settlement Agreement Pursuant To Bankruptcy Rule 9019 Filed By Met-Coil Systems Corporation (D.I. 196, Filed 10/20/03).

Related Pleadings:

- a) Met-Coil's Motion For Leave To File Under Seal Exhibit A To Its Motion To Assume Settlement Agreement Or In The Alternative To Approve Settlement Agreement Pursuant To Bankruptcy Rule 9019 (D.I. 195, Filed 10/20/03);
- b) Stipulation To Extend Briefing Schedule By Met-Coil Systems Corporation (D.I. 248, Filed 11/7/03); and
- c) Debtor's Objection And Response To Travelers' Motion To Defer Ruling Re: Docket No. 196 And Travelers' Preliminary Response To Debtors Motion To Assume Settlement, Or In The Alternative, To Approve Settlement (D.I. 313, Filed 12/3/03).

Objection Deadline: November 11, 2003 at 4:00 p.m. (Eastern Time). The Official Committee of Unsecured Creditors was granted until December 5, 2003 at 12:00 p.m. (Eastern Time) to file a response to this pleading.

Responses Received:

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<sup>1</sup> Modifications to the Notice of Amended Agenda of Matters Scheduled For Hearing On April 19, 2004 At 10:30 a.m. (Eastern Time) are indicated in **bold** type.

- a) Motion To Approve Travelers' Motion To Defer Ruling Filed By The Travelers Indemnity Company Of Illinois And Travelers Casualty And Surety Company F/K/A The Aetna Casualty And Surety Company (D.I. 262, Filed 11/14/03);
- b) Travelers' Preliminary Response To Debtor's Motion To Assume Settlement, Or In The Alternative, To Approve Settlement Filed By The Travelers Indemnity Company Of Illinois And Travelers Casualty And Surety Company F/K/A The Aetna Casualty And Surety Company (D.I. 295, Filed 11/25/03);
- c) Limited Objection To Debtor's Motion To Assume Settlement Agreement With Travelers Casualty And Insurance Company Filed By Mestek, Inc. (D.I. 298, Filed 11/26/03);
- d) Objection To Travelers' Motion To Defer Ruling On Debtor's Motion To Assume Settlement Agreement, Filed By Mestek, Inc. (D.I. 307, Filed 12/3/03);
- e) Travelers' Motion For Leave To File A Reply In Support If Its Motion To Defer Ruling [Re: Docket No. 262] (D.I. 334, Filed 12/8/03); and
- f) Travelers' Motion For (I) Leave To File Response To Mestek's Limited Objection To Debtor's Motion To Assume Settlement Agreement With Travelers; And (Ii) Leave To File Response And Exhibits Under Seal [Re Docket No. 298] (D.I. 336, Filed 12/8/03).

Status: This matter is adjourned to May 24, 2004 at 10:30 a.m. (Eastern Time)

- 2. Disclosure Statement Pursuant To Section 1125 Of The Bankruptcy Code For The Chapter 11 Plan Of Reorganization Proposed By Met-Coil Systems Corporation And Mestek, Inc., As Co-Proponents Filed By Met-Coil Systems Corporation (D.I. 244, Filed 11/5/03).

Related Pleading:

- a) Notice Of (A) Filing Of Disclosure Statement And Plan Of Reorganization, (B) Objection Deadline With Regard To Adequacy Of The Disclosure Statement And (C) The Disclosure Statement Hearing (D.I. 246, Filed 11/5/03).

Objection Deadline: December 3, 2003 at 4:00 p.m. (Eastern Time). The Office of the United States Trustee was granted until December 5, 2003 at noon (Eastern Time) to file an objection.

Responses Received:

- a) Objection Of Devane And Personal Injury Claimants To (1) The Adequacy Of The Disclosure Statement To The Debtor's And Mestek, Inc.'s Joint Plan Of Reorganization (Docket #244) And (II) The Debtor's Motion For Entry Of An Order (A) Approving Procedures For The Consideration Of Alternative Plan Proposals And The Selection Of A Winning Plan Sponsor And (B) Approving Form And Notice Of Alternative Plan Procedures (Docket #293) (D.I. 304, Filed 12/3/03);
- b) Objection Of Pacific Employers Insurance Company, Et Al., To Disclosure Statement Pursuant To Section 1125 Of The Bankruptcy Code For The Chapter 11 Plan Of Reorganization Proposed By Met-Coil Systems Corporation And Mestek, Inc., As Co-Proponents (D.I. 305, Filed 12/3/03);
- c) Objection To Proposed Disclosure Statement Pursuant To Section 1125 Of The Bankruptcy Code For The Plan Of Reorganization By Met-Coil Systems Corporation And Mestek, Inc., As Co-Proponents Filed By Honeywell International, Inc. (D.I. 306, Filed 12/3/03);
- d) Objection To The Debtor's Proposed Disclosure Statement, Filed By Pension Benefit Guaranty Corporation (D.I. 308, Filed 12/3/03);
- e) Objection To Disclosure Statement Pursuant To Section 1125 Of The Bankruptcy Code For The Chapter 11 Plan Of Reorganization Proposed By Met-Coil Systems Corporation And Mestek, Inc., As Co-Proponents Filed By Theresa Mejdrech, Daniel Mejdrech, Mary Beno, Mark Beno, Individually And On Behalf Of All Persons Similarly Situated (D.I. 309, Filed 12/3/03);
- f) Objection To Debtor's Disclosure Statement Regarding Proposed Plan Of Reorganization For Met-Coil Systems Corporation Filed By The Travelers Indemnity Company Of Illinois And Travelers Casualty And Surety Company F/K/A The Aetna Casualty And Surety Company (D.I. 310, Filed 12/3/03);
- g) Objection To Debtor's Disclosure Statement)[Related To D.I. Nos. 244, 246] Filed By Arrow Gear Company, Ames Supply Co., Bison Gear And Engineering Corp., Flexible Steel Lacing Company, Lindy Manufacturing Company, Magnetrol International, Inc., Morey Corporation, Rexnord Corporation (D.I. 312, Filed 12/3/03);
- h) Objection To Disclosure Statement For The Chapter 11 Plan Of Reorganization Proposed By Met-Coil Systems Corporation And Mestek,

Inc., As Co-Proponents, Filed By Official Committee Of Unsecured Creditors (D.I. 315, Filed 12/3/03);

- i) Objection To Chapter 11 Plan Of Reorganization Filed By Victoria Shark (D.I. 316, Filed 12/2/03); and
- j) Objection Of The United States Trustee To The Approval Of The Disclosure Statement Pursuant To Section 1125 Of The Bankruptcy Code For The Chapter 11 Plan Of Reorganization Proposed By Met-Coil Systems Corporation And Mestek, Inc., As Co-Proponents (Re: Docket No. 244) And To Motion For Entry Of Order (A) Approving Procedures For The Consideration Of Alternative Plan Proposals And The Selection Of A Winning Plan Sponsor And (B) Approving Form And Manner Of Notice Of Alternative Plan Procedures (Re: Docket No. 293) (D.I. 326, Filed 12/5/03).

Status: This matter is adjourned to May 24, 2004 at 10:30 a.m. (Eastern Time).

- 3. Motion For An Order Approving (A) The Form Of Solicitation Materials And Ballots, (B) Procedures For Solicitation And Tabulation Of Votes To Accept Or Reject Proposed Plan Of Reorganization, (C) Voting Deadline And Record Date And (D) The Date And Time For The Filing Of Objections To, And The Hearing On, Confirmation Of The Plan (D.I. 284, Filed 11/21/03).

Related Pleading:

- a) Notice Of Motion (D.I. 284, Filed 11/21/03).

Objection Deadline: December 3, 2003 at 4:00 p.m. (Eastern Time).

Response Received:

- a) Limited Objection To Motion For An Order Approving (A) The Form Of Solicitation Materials And Ballots, (B) Procedures For Solicitation And Tabulation Of Votes To Accept Or Reject Proposed Plan Of Reorganization, (C) Voting Deadline And Record Date And (D) The Date And Time For The Filing Of Objections To, And Hearing On, Confirmation Of The Plan, Filed By Theresa Mejdrech, Daniel Mejdrech, Mary Beno, Mark Beno, Individually And On Behalf Of All Persons Similarly Situated (D.I. 311, Filed 12/3/03).

Status: This matter is adjourned to May 24, 2004 at 10:30 a.m. (Eastern Time).

4. Debtor's Motion For Entry Of Order (A) Approving Procedures For The Consideration Of Alternative Plan Proposals And The Solicitation Of A Winning Plan Sponsor And (B) Approving Form And Manner Of Notice Of Alternative Plan Procedures (D.I. 293, Filed 11/24/03).

Related Pleading:

- a) Notice Of Motion (D.I. 293, Filed 11/24/03).

Objection Deadline: December 5, 2003 at 4:00 p.m. (Eastern Time).

Responses Received:

- a) Objection Of Devane And Personal Injury Claimants To (1) The Adequacy Of The Disclosure Statement To The Debtor's And Mestek, Inc.'s Joint Plan Of Reorganization (Docket #244) And (II) The Debtor's Motion For Entry Of An Order (A) Approving Procedures For The Consideration Of Alternative Plan Proposals And The Selection Of A Winning Plan Sponsor And (B) Approving Form And Notice Of Alternative Plan Procedures (Docket #293) (D.I. 304, Filed 12/3/03);
- b) Objection Of Honeywell International Inc. To Debtor's Motion For Entry Of Order (A) Approving Procedures For The Consideration Of Alternative Plan Proposals And The Selection Of A Winning Plan Sponsor And (B) Approving Form And Manner Of Notice Of Alternative Plan Procedures (D.I. 325, Filed 12/5/03); and
- c) Objection Of The United States Trustee To The Approval Of The Disclosure Statement Pursuant To Section 1125 Of The Bankruptcy Code For The Chapter 11 Plan Of Reorganization Proposed By Met-Coil Systems Corporation And Mestek, Inc., As Co-Proponents (Re: Docket No. 244) And To Motion For Entry Of Order (A) Approving Procedures For The Consideration Of Alternative Plan Proposals And The Selection Of A Winning Plan Sponsor And (B) Approving Form And Manner Of Notice Of Alternative Plan Procedures (Re: Docket No. 293) (D.I. 326, Filed 12/5/03).

Status: This matter is adjourned to May 24, 2004 at 10:30 a.m. (Eastern Time).

5. Second Omnibus Objection (Substantive) To Certain Claims Pursuant To Section 502 Of The Bankruptcy Code, Rule 3007 Of The Federal Rules Of Bankruptcy Procedure And Rule 3007-1 Of The Local Rules Of Bankruptcy Procedure (D.I. 327, Filed 12/5/03).

Related Pleadings:

- a) Notice Of Omnibus Objection (D.I. 327, Filed 12/5/03);
- b) Notice Of Withdrawal Of Objection To Claim Nos. 174 And 175 Without Prejudice To Re-File Objection [Re: D.I. 327] (D.I. 389; Filed 12/18/03);
- c) Notice Of Submission Of Proof Of Claim (D.I. 420, Filed 12/22/03);
- d) Status Report Regarding Debtor's Second Omnibus Objection (Substantive) (D.I. 327) (D.I. 499, Filed 1/20/04);
- e) Certification of Counsel (D.I. 688, Filed 3/23/04); and
- f) Order (A) Disallowing and Expunging, (B) Reclassifying or (C) Continuing Objection Regarding Certain Claims (RE: Second Omnibus Objection (Substantive) (D.I. 707, Filed 3/26/04).

Objection Deadline: January 13, 2004 at 4:00 p.m. (Eastern Time).

Responses Received:

- a) Response Of The Ace Claimants To Debtors Second Omnibus Objection (Substantive) To Certain Claims Pursuant To Section 502 Of The Bankruptcy Code, Rule 3007 Of The Federal Rules Of Bankruptcy Procedure And Rule 3007-1 Of The Local Rules Of Bankruptcy Procedure [D.I. 327] (D.I. 471, Filed 1/12/04);
- b) Response Of MB Financial Bank, N.A. To Debtor's Second Omnibus Objection (Substantive) To Certain Claims Pursuant To Section 502 Of The Bankruptcy Code, Rule 3007 Of The Federal Rules Of Bankruptcy Procedure And Rule 3007-1 Of The Local Rules Of Bankruptcy Procedure" (D.I. 478, Filed 1/12/04); and
- c) Response of New England H.V.A.C. Services, Corporation to Debtor's Second and Third Omnibus Objections to Claims on Substantive and Non-Substantive Grounds, Respectively (D.I. 548, Filed 2/10/04).

Status: There are no claims under the Second Omnibus Objection set for hearing on April 19, 2004. All remaining claims under the Second Omnibus Objection are set for hearing on May 24, 2004 at 10:30 a.m. (Eastern Time).

6. Third Omnibus Objection (Non-Substantive) To Certain Claims Pursuant To Section 502 Of The Bankruptcy Code, Rule 3007 Of The Federal Rules Of Bankruptcy Procedure And Rule 3007-1 Of The Local Rules Of Bankruptcy Procedure (D.I. 328, Filed 12/5/03).

Related Pleadings:

- a) Notice Of Omnibus Objection (D.I. 328, Filed 12/5/03);
- b) Notice Of Submission Of Proof Of Claim (D.I. 419, Filed 12/22/03);
- c) Status Report Regarding Debtor's Third Omnibus Objection (Substantive) (D.I. 328) (D.I. 520, Filed 1/20/04); and
- d) Order Disallowing And Expunging Certain Claims (Re: Third Omnibus Objection (Non-Substantive) (D.I. 541, Filed 2/6/04).

Objection Deadline: January 13, 2004 at 4:00 p.m. (Eastern Time).

Responses Received:

- a) Response To Debtor's Third Omnibus Objection (Non-Substantive) To Certain Claims Filed By Roger Williams (D.I. 423, Filed 12/19/03); and
- b) Response Of New England H.V.A./C. Services, Corporation To Debtor's Second And Third Omnibus Objections To Claims On Substantive And Non-Substantive Grounds, Respectively (D.I. 548, Filed 2/10/04).

Status: There are no claims under the Third Omnibus Objection set for hearing on April 19, 2004. All remaining claims under the Third Omnibus Objection are set for hearing on May 24, 2004 at 10:30 a.m. (Eastern Time).

7. Debtor's Motion To Approve 2004 Settlement Agreement Pursuant To Bankruptcy Code Section 105 And Bankruptcy Rule 9019 (D.I. 526, Filed 1/28/04).

Related Pleading:

- a) Notice Of Motion (D.I. 526, Filed 1/28/04).

Objection Deadline: February 10, 2004 at 4:00 p.m. (Eastern Time). The objection deadline has been extended to February 12, 2004 at 4:00 p.m. for the Committee and to March 15, 2004 at 12:00 p.m. for Honeywell International, Inc.

Response Received:

- a) Response of the ACE USA Claimants to Debtors Motion to Approve 2004 Settlement Agreement Pursuant to Bankruptcy Code Section 105 and Bankruptcy Rule 9019 (D.I. 546, Filed 2/10/04).

Status: This matter is adjourned to May 24, 2004 at 10:30 a.m. (Eastern Time).

8. Debtor's Motion To Limit Notice With Respect To Debtor's Motions (1) To Approve 2004 Settlement Agreement With Travelers Pursuant To Bankruptcy Code Section 105 And Bankruptcy Rule 9019 And (2) For Leave To File Under Seal Exhibit A To Its Motion To Approve 2004 Settlement Agreement With Travelers Pursuant To Bankruptcy Rule 9019 (D.I. 528, Filed 1/28/04).

Related Pleadings:

- a) Debtor's Motion For Leave To File Under Seal Exhibit A To Its Motion To Approve 2004 Settlement Agreement With Travelers Pursuant To Bankruptcy Code Section 105 And Bankruptcy Rule 9019 (D.I. 527, Filed 1/28/04); and
- b) Notice Of Motion (D.I. 528, Filed 1/28/04);

Objection Deadline: February 10, 2004 at 4:00 p.m. (Eastern Time). The objection deadline has been extended to February 12, 2004 at 4:00 p.m. for the Committee.

Response Received: None.

Status: This matter is adjourned to May 24, 2004 at 10:30 a.m. (Eastern Time).

9. Debtor's Motion To Approve Settlement Agreement Pursuant To Bankruptcy Code Section 105 And Bankruptcy Rule 9019 (D.I. 529, Filed 1/28/04).

Related Pleadings:

- a) Notice Of Motion (D.I. 529, Filed 1/28/04);
- b) Debtor's Motion For Leave Pursuant To Bankruptcy Code Section 107(b)(1) And Bankruptcy Rule 9018 To File Exhibit A To Its Motion To Approve Settlement Agreement With AIG Related Insurers Pursuant To Bankruptcy Code Section 105 And Bankruptcy Rule 9019 Under Seal (D.I. 530, Filed 1/28/04); and



- c) Debtor's Motion To Limit Notice With Respect To Debtor's Motions (1) To Approve Settlement Agreement With AIG Related Insurers Pursuant To Bankruptcy Code Section 105 And Bankruptcy Rule 9019 And (2) For Leave Pursuant To Bankruptcy Code Section 107(b)(1) And Bankruptcy Rule 9018 To File Exhibit A To Its Motion To Approve Settlement Agreement With AIG Related Insurers Pursuant To Bankruptcy Code Section 105 And Bankruptcy Rule 9019 Under Seal (D.I. 531, Filed 1/28/04).

Objection Deadline: February 10, 2004 at 4:00 p.m. (Eastern Time). The objection deadline has been extended to February 12, 2004 at 4:00 p.m. for the Committee and to March 15, 2004 at 12:00 p.m. (Eastern Time) for Honeywell International, Inc.

Response Received:

- a) Response of the ACE USA Claimants to Debtors Motion to Approve Settlement Agreement Pursuant to Bankruptcy Code Section 105 and Bankruptcy Rule 9019 (D.I. 545, Filed 2/10/04).

Status: This matter is adjourned to May 24, 2004 at 10:30 a.m. (Eastern Time).

### **UNCONTESTED MATTERS GOING FORWARD**

10. Debtor's Fourth Omnibus Objection (Non-Substantive) To Certain Claims Pursuant To Section 502 Of The Bankruptcy Code, Rule 3007 Of The Federal Rules Of Bankruptcy Procedure And Rule 3007-1 Of The Local Rules Of Bankruptcy Procedure (D.I. 625, Filed 3/4/04).

Related Pleadings:

- a) Notice Of Omnibus Objection (D.I. 625, Filed 3/4/04); and  
b) Notice of Submission of Proof of Claims (D.I. 728, Filed 4/5/04).

Objection Deadline: April 12, 2004 at 4:00 p.m. (Eastern Time).

Responses Received: None at this time.

Status: This matter is going forward.

11. Motion to Authorize to Commence and Prosecute Certain Actions on Behalf of the Estate and for Related Relief, Pursuant to Sections 105, 1103(c)(5) and 109(b)

of the Bankruptcy Code Filed by Official Committee of Unsecured Creditors (D.I. 741, Filed 4/12/04).

Related Pleading:

- a) Motion to Shorten (D.I. 740, Filed 4/12/04);and
- b) Order Regarding Motion to Shorten (D.I. 746, Filed 4/14/04).

Objection Deadline: April 16, 2004 at 4:00 p.m. (Eastern Time).

Response Received:

- a) **Response To Motion Of The Official Committee Of Unsecured Creditors For Authority To Commence And Prosecute Certain Actions On Behalf Of The Estate And For Related Relief And Motion For Shortened Notice Thereon (D.I. 750, Filed 4/15/04);**
- b) **Response Of Met-Coil Systems Corporation To Motion Of The Official Committee Of Unsecured Creditors Pursuant To Sections 105, 1103(c)(5) And 109(b) Of The Bankruptcy Code For Authority To Commence And Prosecute Certain Actions On Behalf Of The Estate And For Related Relief [Re: D.I. 741] (D.I. 755, Filed 4/16/04).**

Status: This matter is going forward.

- 12. Motion for Leave to File Objection to the Request of the Mejdrech Class to Participate in Rule 2004 Discovery by the Official Committee of Unsecured Creditors Filed by Mestek, Inc. (D.I. 747, Filed 4/14/04).

Related Pleading:

- a) Motion to Shorten (D.I. 748, Filed 4/14/04).

Response Deadline : April 19, 2004 at 10:30 a.m. (Eastern Time).

Responses Received: None to date.

Status: This matter is going forward.

**CONTESTED MATTERS**

- 13. Debtor's Fifth Omnibus Objection (Substantive) To Certain Claims Pursuant To Section 502 Of The Bankruptcy Code, Rule 3007 Of The Federal Rules Of

Bankruptcy Procedure And Rule 3007-1 Of The Local Rules Of Bankruptcy Procedure ( D.I. 626, Filed 3/4/04).

Related Pleadings:

- a) Notice Of Omnibus Objection (D.I. 626, Filed 3/4/04); and
- b) Notice of Submission of Proof of Claims (D.I. 728, Filed 4/5/04).

Objection Deadline: April 12, 2004 at 4:00 p.m. (Eastern Time).

Responses Received:

- a) Objection Of Damon Hunt To Debtor's Fifth Omnibus Objection (Substantive) To Certain Claims Pursuant To Section 502 Of The Bankruptcy Code, Rule 3007 Of The Federal Rules Of Bankruptcy Procedure And Rule 3007-1 Of The Local Rules Of Bankruptcy Procedure (D.I. 745, Filed 4/13/04).

Status: This matter is adjourned to May 24, 2004 at 10:30 a.m. (Eastern Time) with regard to Damon Hunt (Claim No. 297) and Pension Benefit Guaranty Corporation (Claims Nos. 232, 233 and 234). The hearing on the remaining claims are going forward.

- 14. Motion To Authorize Motion Of The Official Committee Of Unsecured Creditors For An Order Authorizing And Directing The Production Of Documents From And Oral Examinations By Deposition Of Met-Coil Systems Corporation And Mestek, Inc. Pursuant to Fed. R. Bankr. P. 2004 (D.I. 713, Filed 3/31/04).

Related Pleading:

- a) Notice Of Motion D.I. 713, Filed 3/31/04).

Objection Deadline: April 12, 2004 at 4:00 p.m. (Eastern Time).

Responses Received:

- a) Response To Motion Of The Official Committee Of Unsecured Creditors For An Order Authorizing And Directing The Production Of Documents From And Oral Examinations By Deposition Of Met-Coil Systems Corporation And Mestek, Inc. Pursuant To Fed. R. Bankr. P. 2004 And Request To Participate In Discovery Filed By Theresa Mejdrech, Daniel Mejdrech, Mary Beno, Mark Beno, Individually And On Behalf Of All Persons Similarly Situated (D.I. 736, Filed 4/12/04);

- b) Response To Motion Of The Official Committee Of Unsecured Creditors For An Order Authorizing And Directing The Production Of Documents From And Oral Examinations By Deposition Of Met-Coil Systems Corporation And Mestek, Inc. Pursuant To Fed. R. Bankr. P. 2004 Filed By Mestek, Inc. (D.I. 737, Filed 4/12/04); and
- c) Response Of Met-Coil Systems Corporation To Motion Of The Official Committee Of Unsecured Creditors For An Order Authorizing And Directing The Production Of Documents From And Oral Examinations By Deposition Of Met-Coil Systems Corporation And Mestek, Inc. Pursuant To Fed. R. Bankr. P. 2004 (D.I. 739, Filed 4/12/04).

Status: This matter is going forward.

### **PROFESSIONAL FEE APPLICATIONS**

- 15. First Quarterly Fee Application Of Klehr, Harrison, Harvey, Branzburg & Ellers, LLP, Requesting Approval And Allowance Of Fees For Services Rendered And Reimbursement Of Expenses Incurred As Counsel To The Committee of Unsecured Creditors For The Period From September 15, 2003 Through December 31, 2003 (D.I. 669, Filed 3/17/04).

Related Pleadings:

- a) Interim Application For Compensation And For Reimbursement Of Expenses For The Representation Of The Official Committee Of Unsecured Creditors For The Period From September 15, 2003 Through September 30, 2003 (FIRST) Filed (D.I. 415, Filed 12/19/03);
- b) Interim Application For Compensation And For Reimbursement Of Expenses For The Representation Of The Official Committee Of Unsecured Creditors For The Period From October 1, 2003 Through October 31, 2003 (SECOND) (D.I. 416, Filed 12/19/03);
- c) Interim Application For Compensation And For Reimbursement Of Expenses For The Representation Of The Official Committee Of Unsecured Creditors For The Period From November 1, 2003 Through November 30, 2003 (THIRD) (D.I. 426, Filed 12/26/03);
- d) Certificate Of No Objection Regarding Third Interim Application Of Klehr, Harrison, Harvey, Branzburg And Ellers LLP For Compensation And For Reimbursement Of Expenses For The Period From November 1, 2003 Through November 30, 2003 (D.I. 506, Filed 1/21/04);

- e) Certificate Of No Objection For Interim Application For Compensation And For Reimbursement Of Expenses For The Representation Of The Official Committee Of Unsecured Creditors For The Period From September 15, 2003 Through September 30, 2003 (FIRST) (D.I. 516, Filed 1/26/04);
- f) Certificate Of No Objection Regarding The Second Interim Application Of Klehr, Harrison, Harvey, Branzburg And Ellers LLP For Compensation And For Reimbursement Of Expenses For The Period From October 1, 2003 Through October 31, 2003[D.I. 416] (D.I. 520, Filed 1/27/04);
- g) Fourth Interim Application Of Klehr, Harrison, Harvey, Branzburg And Ellers, LLP For Compensation And For Reimbursement Of Expenses For The Representation Of The Official Committee Of Unsecured Creditors For The Period From December 1, 2003 Through December 31, 2003 (D.I. 534, Filed 1/30/04);
- h) Certificate Of No Objection Regarding Fourth Interim Application Of Klehr, Harrison, Harvey, Branzburg And Ellers LLP For Compensation And For Reimbursement Of Expenses For The Period From December 1, 2003 Through December 31, 2003 [D.I. 534] (D.I. 622, Filed 3/4/04); and
- i) Certificate Of No Objection To The First Quarterly Fee Application Of Klehr, Harrison, Harvey, Branzburg & Ellers LLP Requesting Approval And Allowance Of Fees For Services Rendered And Reimbursement Of Expenses Incurred As Counsel To The Unsecured Creditors For The Period From September 15, 2003 Through December 31, 2003 (D.I. 733, Filed 4/8/04).

Status: This matter is going forward.

16. First Interim Fee Application Request Of Parente Randolph, LLC For Interim Compensation For Services Rendered And Reimbursement Of Expenses As Accountants And Financial Advisors To The Official Committee Of Unsecured Creditors For The Period From September 15, 2003 Through December 31, 2003 (D.I. 677, Filed 3/19/04).

Related Pleadings:

- a) First Application For Interim Professional Compensation For Services Rendered And Reimbursement Of Expenses As Accountants And Financial Advisors To The Official Committee Of Unsecured Creditors - For Parente Randolph, LLC, Accountant, Period: 9/15/2003 To 10/31/2003 (D.I. 366, Filed 12/11/03);

- b) Certificate Of No Objection Regarding The First Monthly Fee Application Of Parente Randolph, LLC For Compensation For Services Rendered And Reimbursement Of Expenses As Accountants And Financial Advisors To The Official Committee Of Unsecured Creditors For The Period From September 15, 2003 Through October 31, 2003 (D.I. 448, Filed 1/5/04);
- c) Monthly Application For Interim Professional Compensation (Second Monthly Fee Application) For Parente Randolph, LLC, Accountant, Period: 11/1/2003 To 11/30/2003 (D.I. 518, Filed 1/27/04);
- d) Certificate Of No Objection Regarding The Second Monthly Fee Application Of Parente Randolph, LLC For Compensation For Services Rendered And Reimbursement Of Expenses As Accountants And Financial Advisors To The Official Committee Of Unsecured Creditors For The Period From November 1, 2003 Through November 30, 2003 (D.I. 579, Filed 2/17/04);
- e) Monthly Application For Interim Professional Compensation (Third Monthly Fee Application) For Parente Randolph, LLC, Accountant, Period: 12/1/2003 To 12/31/2003 (D.I. 594, Filed 2/27/04); and
- f) Certificate Of No Objection (Regarding The Third Monthly Fee Application Of Parente Randolph, LLC For Compensation For Services Rendered And Reimbursement Of Expenses As Accountants And Financial Advisors To The Official Committee Of Unsecured Creditors For The Period From December 1, 2003 Through December 31, 2003) (Related To Docket. No. 594) (D.I. 676, Filed 3/19/04).

Status: This matter is going forward.

Dated: Wilmington, Delaware  
April 19, 2004

MORRIS, NICHOLS, ARSHT & TUNNELL

/s/ Daniel B. Butz

Eric D. Schwartz (No. 3134)  
Daniel B. Butz (No. 4227)  
Alicia B. Kelly (4485)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, Delaware 19899-1347  
(302) 658-9200

- and -

GOLDBERG, KOHN, BELL, BLACK,  
ROSENBLOOM & MORITZ, LTD.  
Ronald Barliant (Illinois ARDC# 0112984)  
Kathryn A. Pamerter (Illinois ARDC #6231191)  
55 East Monroe Street, Suite 3700  
Chicago, Illinois 60603  
Telephone: (312) 201-4000  
Facsimile: (312) 332-2196

Attorneys for the Debtor and  
Debtor-in-Possession