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.)	Objection Deadline: June 1, 2004 at 4:00 p.m.		
FOR COMPENSATION FO REIMBURSEMENT OF EXPEN LEGAL REPRESENTATIVE	CONAWAY STARGATT & TAYLOR, LLP OR SERVICES RENDERED AND SES AS COUNSEL TO ERIC GREEN, FOR FUTURE CLAIMANTS FOR 1, 2004 THROUGH MARCH 31, 2004		
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:	March 1, 2004 through March 31, 2004		
Amount of Compensation sought as actual, reasonable and necessary:	\$ <u>42,650.00</u>		
Amount of Expense Reimbursement sought as actual, reasonable and necessary:	\$ <u>9,774.69</u>		
This is an: X interimfinal application			
This application includes 2.20 hours of time wit with the preparation of interim fee applications.	h a value of \$354.00 for time incurred in connection		

Prior Applications:

			Requested		Paid	
	Date Filed	Period Covered	Fees	Expenses	Fees	Expenses
1	11/26/2003	9/10/03 - 10/31/03	\$66,097.50	\$4,710.19	\$52,878.00	\$4,710.19
2	12/31/2003	11/1/03 - 11/30/03	\$28,620.50	\$3,167.64	\$22,896.40	\$3,167.64
3	02/11/2004	12/1/03 - 12/31/03	\$62,613.00	\$4,889.90	\$50,090.40	\$4,889.90
4	02/25/2004	01/01/04 - 01/31/04	\$52,824.00	\$2,948.58	\$42,259.20	\$2,948.58
5	03/24/2004	02/01/04 - 02/29/04	\$84,041.00	\$4,922.75	\$67,232.80	\$4,922.75

ATTACHMENT B TO FEE APPLICATION

Name of Professional Person	Position of the Applicant, Number of Years in that Position, Prior Relevant Experience, Year of Obtaining License to Practice, Area of Expertise	Hourly Billing Rate (including changes)	Total Billed Hours	Total Compensation
James L. Patton, Jr.	Partner since 1989. Joined firm as associate in 1983. Member Del. Bar since 1983.	\$550.00	40.20	\$22,110.00
Craig D. Grear	Partner since 2000 Joined firm as an associate in 1996. Member of DE Bar since 1990.	\$425.00	2.50	\$1,062.50
James P. Hughes	Partner since 1999. Joined firm as an associate in 1992. Member of DE Bar since 1992.	\$425.00	1.20	\$510.00
Edwin J. Harron	Partner since 2003. Joined firm as an associate in 1996. Member of DE Bar since 1995.	\$385.00	15.60	\$6,006.00
Anthony G. Flynn	Partner since 1988. Joined the firm as an associate in 1979. Member of DE Bar since 1977	\$375.00	12.30	\$4,612.50
Timothy P. Cairns	Joined the firm as an associate in 2002. Member of DE Bar since 2002	\$215.00	16.80	\$3,612.00
Sean T. Greecher	Joined the firm as an associate in 2003. Member of DE Bar since 2004.	\$200.00	4.90	\$980.00
Kimberly Beck	Paralegal 5 years	\$130.00	28.90	\$3,757.00
Grand Total:			122,40	\$42,650.00
Blended Rate:			\$34	48.45/hour

COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees
Case Administration (1001)	2.60	\$565.50
Court Hearings (1002)	5.30	\$1,836.50
Meetings (1008)	2 10	\$1,138.50
Stay Relief Matters (1009)	3.00	\$815.00
Other Adversary Proceedings (1011)	35.70	\$11,930.50
Plan & Disclosure Statement (1012)	41.70	\$21,225.00
Retention of Professionals / Fee Issues (1017)	27.40	\$3,885.00
Fee Applications Preparation (1018)	2.20	\$354.00
Travel (1019)	2.40	\$900.00
TOTAL	122.40	\$42,650.00

EXPENSE SUMMARY

Expenses Category	Total Expenses
Deposition/Transcript	\$ 291.50
Federal Express	25.72
Hotel/Lodging	1,882.25
Long Distance Telephone	80.28
Parking	14.39
Photocopy Charges (@15¢ per page)	1,145.85
Postage	281.10
Transportation Charge	168.11
Travel	5,410.28
Working Meals	475.21
TOTAL	\$9,774.69

WP3:9971591

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Debtor.)	Objection Deadline: June 1, 2004 at 4:00 p.m.

SIXTH 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 MARCH 1, 2004 THROUGH MARCH 31, 2004

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 \$42,650.00 together with reimbursement for actual and necessary expenses incurred in the amount of \$9,774.69 for the period commencing March 1, 2004 through and including March 31, 2004 (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.
- 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 March 1, 2004 through March 31, 2004, showing the amount of \$42,650.00 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, Craig D. Grear, James P. Hughes, Edwin J. Harron, Anthony G. Flynn, Timothy P. Cairns and Sean T. Greecher. Paraprofessional services were provided by Kimberly Beck.
- 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 \$9,774.69. 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 122.40 hours in connection with this matter during the Fee Period.
- 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 counsel in this case under Chapter 11 is \$42,650.00.
- 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 \$42,650.00 as compensation for necessary professional services rendered to the Future Claimants' Representative for the Fee Period, and the sum of \$9,774.69 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: May 11, 2004

YOUNG CONAWAY STARGATT & TAYLOR, LLP

James L. Patton (No. 2202)

Edwin J. Harron (No. 3396)

Timothy P. Cairns (No. 4185)

The Brandywine Building

1000 West Street, 17th Floor

P.O. Box 391

Wilmington, Delaware 19899-0391

Counsel to Eric Green, Legal Representative for Future Claimants

VERIFICATION

STATE OF DELAWARE)	
)	SS:
NEW CASTLE COUNTY)	

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 Future Claimants' Representative 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 12th day of May, 2004.

Notary Public

My commission expires:_

DEBBIE E. LASKIN Notary Public - State of Delaware

My Comm. Expires Dec. 21, 2004