

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.)

**CERTIFICATION OF COUNSEL RE: SECOND REQUEST
FOR APPROVAL OF INTERIM FEE APPLICATIONS
FOR THE PERIOD JANUARY 1, 2004 THROUGH MARCH 31, 2004**

On June 4, 2004, Young Conaway Stargatt & Taylor, LLP (“Young Conaway”) filed their Second Interim Application for Allowance of Compensation and Reimbursement of Expenses (the “Second Interim Application”) seeking approval of compensation in the amount of \$179,515.00 and reimbursement of expenses in the amount of \$17,646.02 incurred as counsel to Eric Green, Legal Representative of Future Claimants (the “Future Claimants’ Representative”) in this case.

On June 22, 2004, a hearing was held to consider the Application and any objections thereto. At the hearing, this Court inquired into a certain travel charge that appears on the Sixth Application of Young Conaway for Compensation for Services Rendered and Reimbursement of Expenses for the Period from March 1, 2004 through March 31, 2004 (the “Sixth Monthly Application”).

In the Sixth Monthly Application, Young Conaway submitted an expense request for \$2,726.68 for two round trip tickets from Philadelphia, PA, to Chicago, IL, for a February 3, 2004 meeting with the Debtor’s counsel to review the terms of the proposed plan of reorganization and accompanying trust documents.¹ Young Conaway submits that, while such an expense appears

¹ At the June 22, 2004 hearing, this Court questioned Young Conaway’s request for an expense charge of approximately \$3,700.00 for the two airfares. As indicated on page 16 of the expense detail submitted with the Sixth Monthly Application, the originally recorded expense request of \$3,768.68 for the airfares was reduced to a billing value of \$2,726.68. The return flights were first class fares. However, before submitting

exorbitant, the amount requested for the airfares is reasonable in light of the Debtor's request for a meeting that required an accelerated time frame and circumstances surrounding air travel during inclement weather.

The Debtor requested counsel to the Future Claimants' Representative travel to Chicago to attend a meeting to discuss outstanding issues concerning proposed amendments to the previously filed plan of reorganization and the accompanying trust documents. Due to the limited timeframe within which the Debtor sought solicit comments and amend its plan, Young Conaway was compelled to purchase the fares on a shortened timeframe and an elevated rate.

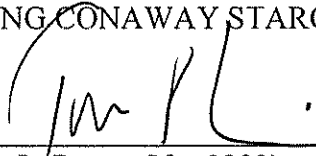
Further, on the evening of February 3, 2004, the scheduled flight for Young Conaway personnel from Chicago to Philadelphia was delayed due to weather for an extended period. Ultimately, Young Conaway purchased alternate airfares from a different air carrier. These last-minute purchases were also at elevated rates due to the demand for alternate travel from other cancelled flights and, although substantial, likely prevented additional expenses and fees which would have resulted from an additional night's stay in Chicago.

the expense request, Young Conaway voluntarily reduced the fares from first class to the coach class fare for the same flight.

As such, Young Conaway respectfully seeks compensation in the amount of \$179,515.00 and reimbursement of expenses in the amount of \$17,646.02 and the approval of payment of the holdback amounts set forth on the Second Interim Application.

Dated: June 22, 2004

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