

EXHIBIT C

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FORD MOTOR COMPANY - MOTION FOR RELIEF				
Date	Name	Hours	Amount	Description
10/18/2006	JEAN R ROBERTSON	4.00	1,600.00	MULTIPLE PHONE CALLS WITH DEBTORS' COUNSEL REGARDING BACKGROUND AND MISCELLANEOUS MATTERS/UPDATES (.9); MULTIPLE PHONE CALLS WITH J. MALLACK REGARDING NEGOTIATIONS WITH FORD'S COUNSEL AND MISCELLANEOUS MATTERS, INCLUDING BACKGROUND FACTS, SHIPPING ISSUES AND THE MOTION FOR RELIEF FROM STAY (.8); MULTIPLE PHONE CALLS THROUGHOUT DAY WITH COUNSEL FOR FORD REGARDING NEGOTIATIONS TO RESOLVE MOTION (1.0); REVIEW MOTION (.4); PREPARE E-MAIL SETTLEMENT PROPOSAL TO FORD'S COUNSEL (.4); REVIEW HEARING NOTICE AND PREPARE E-MAIL TO CLIENT REGARDING SAME (.2); PHONE CALL TO COUNSEL TO THE LENDER REGARDING FORD'S MOTION AND STATUS (.4); CONFERENCE WITH S. MALLOY REGARDING STRATEGY AND FOLLOW UP (.5).
10/18/2006	SEAN D MALLOY	0.50	182.50	WORK WITH ROBERTSON ON STRATEGY AND FOLLOW UP FOR FORD MOTOR DISPUTE.
10/19/2006	SEAN D MALLOY	3.90	1,423.50	WORK THROUGHOUT DAY ON FORD RELIEF FROM STAY ISSUE, INCLUDING CALLS WITH ROBERTSON RE: VARIOUS ISSUES (.2); FOUR NEGOTIATION CALLS WITH FLEMING AND/OR TUREZAK (1.0); MULTIPLE CALLS WITH J. MALLAK RE: FACTUAL ISSUES AND SETTLEMENT (.3); CALLS WITH T. WEARSCH FOR CEP (.2); REVIEW, EDIT, AND CIRCULATE PROPOSED STIPULATION (.7); CORRESPONDENCE AND CALLS WITH BANK COUNSEL (.3); ATTEND AND PARTICIPATE IN TWO CONFERENCE CALL STATUS HEARINGS (.6); FURTHER NEGOTIATIONS AND FACTUAL CORRESPONDENCE WITH COMMITTEE, FORD, AND WACHOVIA (.6).
10/19/2006	JEAN R ROBERTSON	4.70	1,880.00	MULTIPLE EXTENDED PHONE CALLS TO COUNSEL FOR FORD REGARDING STIPULATED ORDER (1.2); MULTIPLE PHONE CALLS WITH DEBTORS' COUNSEL REGARDING STATUS AND INQUIRIES (.4); PHONE CALL WITH S. MALLOY REGARDING HEARING COVERAGE AND DEVELOPMENTS (.5); REVIEW DRAFT STIPULATION FROM FORD (.3); MULTIPLE PHONE CALLS WITH THE CLIENT REGARDING SAME (.7); REVIEW VARIOUS E-MAILS REGARDING DEVELOPMENTS (.4); PHONE CALL WITH S. MALLOY AND J. DOWNS FOR WACHOVIA (.2); PHONE CALL WITH M. FREEDLANDER FOR THE COMMITTEE (2.); OUTLINE PROPOSED FINDINGS AND CONCLUSIONS OF LAW (.8).
10/20/2006	JEAN R ROBERTSON	9.50	3,800.00	MULTIPLE EXTENDED PHONE CALLS WITH COUNSEL FOR FORD REGARDING STIPULATION AND NEGOTIATED POINTS (1.9); PHONE CALLS (X2) TO M. FREEDLANDER REGARDING SAME (.4); PHONE CALLS (X3) WITH COUNSEL FOR WACHOVIA REGARDING SAME (.5); PHONE CALLS (X2) WITH COURT REGARDING TIMING (.2); EDITS TO PROPOSED STIPULATION (2.0); ATTENTION TO DRAFT FINDINGS AND CONCLUSIONS OF LAW (1.0); REVIEW FORD'S FINDINGS AND CONCLUSIONS OF LAW AND EXHIBIT (GT&C) (.7); PREPARE AND REVIEW MULTIPLE

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Date	Name	Hours	Amount	Description
				E-MAILS REGARDING STATUS AND CHANGES TO THE STIPULATION (.8); ATTEND CONTINUED PRELIMINARY HEARING VIA TELECONFERENCE (.9); FOLLOW UP PHONE CALL WITH CLIENT REGARDING OUTCOME AND A/R RECONCILIATION (.8); REVIEW EXCEL SPREADSHEETS WITH RECONCILIATION (.3).
10/20/2006	MICHAEL J KACZKA	0.80	152.00	RESEARCH RE: OHIO MOLDER'S LIENS (.4); REVIEW FORD'S MOTION (.2); MEET WITH J. ROBERTSON RE: SAME (.2).
10/20/2006	SEAN D MALLOY	0.50	182.50	WORK WITH ROBERTSON RE: FORD STRATEGY.
10/21/2006	MICHAEL J KACZKA	0.80	152.00	RESEARCH RE: OHIO MOLDER'S LIENS (.6); PREPARE EMAIL TO J. ROBERTSON RE: SAME (.2).
10/22/2006	JEAN R ROBERTSON	2.80	1,120.00	REVIEW REVISED A/R SUMMARY FROM CLIENT (.3); PREPARE E-MAILS REGARDING SAME AND CIRCULATE (.6); REVIEW RESEARCH REGARDING MOLDER'S LIEN LAW AND MAKE EDITS TO FINDINGS OF FACTS AND CONCLUSIONS OF LAW (1.9).
10/22/2006	MICHAEL J KACZKA	0.60	114.00	RESEARCH RE: MICHIGAN MOLDER'S LIENS (.5); PREPARE EMAIL TO J. ROBERTSON RE: SAME (.1).
10/23/2006	JEAN R ROBERTSON	6.90	2,760.00	REVIEW AND EDIT FINDINGS OF FACT AND CONCLUSIONS OF LAW (3.1); REVIEW COURT'S GENERAL ORDER REGARDING PROCEDURES (.3); REVIEW AND FILE NOTICE OF APPEARANCE (.2); PHONE CALLS WITH COUNSEL FOR FORD REGARDING NEGOTIATED STIPULATION TERMS (.6); MULTIPLE PHONE CALLS WITH CLIENT REGARDING RESOLUTION AND RECONCILIATION OF DISPUTED AMOUNTS (1.0); REVIEW VARIOUS WORKSHEETS REGARDING SAME (.4); PREPARE NOTES FOR COURT APPEARANCE TOMORROW (.6); ATTEND COURT STATUS CONFERENCE VIA TELEPHONE (.7).
10/24/2006	JEAN R ROBERTSON	7.50	3,000.00	ATTEND HEARINGS, INCLUDING NEGOTIATIONS WITH FORD'S COUNSEL, CONFERENCES WITH COUNSEL FOR THE COMMITTEE AND WACHOVIA, AND A COURT PRESENTATION OF THE SETTLEMENT (6.0); PREPARE E-MAILS TO CLIENT AND FORD'S COUNSEL REGARDING STIPULATION (.4); REVIEW AND MAKE EDITS TO STIPULATION (.4); PHONE CALL WITH J. FLEMING REGARDING SAME (.2); CONFERENCE WITH C. BUDDNER REGARDING UPLOADING OF STIPULATION (.2); PHONE CALL TO GRANT THORNTON AND FIFTH THIRD BANK REGARDING ESCROW AGREEMENTS (.3).
10/25/2006	JEAN R ROBERTSON	7.60	3,040.00	PHONE CALL TO GRANT THORNTON AND 5/3 BANK REGARDING ESCROW AGENCY (1.0); PREPARE MULTIPLE DETAILED STATUS E-MAILS (1.0); PHONE CALL TO M. FREEDLANDER AND J. DOWNS REGARDING STATUS AND DEVELOPMENTS (.3); PHONE CALL WITH T. BERGEN REGARDING RELEASE OF TOOLING (.3); PHONE CALLS WITH FORD'S COUNSEL REGARDING DEVELOPMENTS AND STATUS (1.0); CONFERENCE WITH J. WIRTSHAFTER REGARDING DRAFT ESCROW AGREEMENT (.3); FOLLOW UP PHONE CALL WITH L. MARCERO (GRANT THORNTON) REGARDING SAME (.4); REVIEW AND EDIT PROPOSED

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Date	Name	Hours	Amount	Description
				ESCROW AGREEMENT (1.0); PREPARE E-MAILS REGARDING SAME (.3); PHONE CALL WITH A. TURSCAK (.2); MAKE EDITS TO AGREEMENT BASED UPON COMMENTS (.5); MULTIPLE PHONE CALLS WITH CLIENT REGARDING ESCROW AND RELEASE (.6); FINALIZE SAME AND CIRCULATE FOR SIGNATURE (.5); PHONE CALL TO L. MARCERO (GRANT THORNTON) REGARDING FINALIZING AND FUNDING (.2).
10/26/2006	JEAN R ROBERTSON	1.20	480.00	REVIEW AND RESPOND TO MULTIPLE E-MAILS REGARDING ESCROW AGREEMENT AND LOGISTICS FOR FORD TO PICK UP TOOLING (.8); PREPARE LETTER TO CIRCULATE SIGNED ESCROW AGREEMENT (.2); PREPARE E-MAIL TO GRANT THORNTON REGARDING INTEREST ON ESCROW ACCOUNT FUNDS (.2).
10/17/2006	SHAWN M RILEY	1.10	506.00	CALLS WITH J. ROBERTSON AND WITH COUNSEL FOR FORD (.6); CALL WITH WEARSH FROM B&H ON GENERAL RE SOURCING ISSUES (.5).
10/24/2006	CHRISTINE P BUDDNER	0.20	27.00	ATTENTION TO UPLOADING STIPULATION AND AGREED ORDER FOR EMERGENCY MOTION FOR RFS FORD.
10/25/2006	JOHN M WIRTSHAFTER	2.00	760.00	ATTENTION TO, PREPARATION OF AND REVIEW OF ESCROW AGREEMENT (1.50); INTEROFFICE CONFERENCE WITH J. ROBERTSON REGARDING ISSUES FOR ESCROW (.30); TELEPHONE CONFERENCE WITH FIFTH THIRD BANK REGARDING SAME (.20).
11/2/2006	JEAN R ROBERTSON	0.20	80.00	REVIEW AND RESPOND TO E-MAIL FROM J. FLEMING (.1); PREPARE E-MAIL TO CLIENT REGARDING SAME AND FOLLOW UP (.1).
11/6/2006	JEAN R ROBERTSON	0.30	120.00	PHONE CALL TO B. FASSETT AND J. MALLACK REGARDING FORD A/R RECONCILIATION.
11/8/2006	JEAN R ROBERTSON	0.30	120.00	PHONE CALL TO B. FASSETT AND J. MALLAK REGARDING STATUS OF FORD A/R RECONCILIATION.
11/10/2006	JEAN R ROBERTSON	0.20	80.00	PHONE CALL FROM N. LAMB-HALES REGARDING ADMINISTRATIVE CREDITOR MATTER (.1); PHONE CALL TO T. WEARSH REGARDING SAME AND STATUS (.1).
11/21/2006	JEAN R ROBERTSON	0.10	40.00	PREPARE E-MAIL TO CLIENT REGARDING RECONCILIATION STATUS WITH FORD.
11/28/2006	JEAN R ROBERTSON	0.30	120.00	PHONE CALL TO B. FASSETT REGARDING FORD RECONCILIATION; PREPARE FOLLOW UP E-MAILS.
11/29/2006	JEAN R ROBERTSON	0.60	240.00	REVIEW AND RESPOND TO DETAILED E-MAIL FROM B. FASSETT REGARDING FORD INVOICE RECONCILIATION STATUS (.4); REVIEW COURT DOCKET UPDATES (.2).
11/29/2006	JEAN R ROBERTSON	0.30	120.00	PHONE CALL FROM B. FASSETT REGARDING FORD RECONCILIATION AND NEXT STEPS.
12/1/2006	JEAN R ROBERTSON	0.20	80.00	REVIEW AND RESPOND TO E-MAIL FROM J. BARNES TO FORD.
12/4/2006	JEAN R ROBERTSON	1.50	600.00	REVIEW E-MAILS REGARDING FINAL RECONCILIATION (.3); PHONE CALL TO CLIENT (.1); PHONE CALL

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Date	Name	Hours	Amount	Description
				TO FORD'S COUNSEL REGARDING FOLLOW UP WITH ESCROW AGENT (.3); PHONE CALL TO J. HUTCHINSON REGARDING SAME (.2); DRAFT WRITTEN INSTRUCTIONS TO GRANT THORNTON (.3); PREPARE DETAILED E-MAIL TO L. MARSARO AT GRANT THORNTON REGARDING STATUS AND TIMING (.3).
12/6/2006	JEAN R ROBERTSON	0.80	320.00	MAKE EDITS TO DISTRIBUTION INSTRUCTION LETTER (.5); PREPARE E-MAILS TO CLIENT AND FORD'S COUNSEL REGARDING SAME (.3).
12/7/2006	JEAN R ROBERTSON	1.30	520.00	RESPOND TO E-MAIL FROM FORD'S COUNSEL (.2); PREPARE E-MAILS TO CLIENT REGARDING A/P RECONCILIATION (.4); PREPARE E-MAIL TO GRANT THORNTON (ESCROW AGENT) REGARDING DISTRIBUTION (.2); PREPARE DRAFT DISTRIBUTION INSTRUCTIONS (.4); PHONE CALL TO FORD'S COUNSEL (.1).
SUBTOTAL		63.40	24,308.50	

GENERAL CASE ADMINISTRATION				
Date	Name	Hours	Amount	Description
10/23/2006	DEBORAH G MARSHALL	0.90	153.00	DISCUSSION WITH A. TODDY RE SERVICE OF PROPOSED FINDINGS OF FACT (.10); DRAFT NOTICE OF APPEARANCE FOR RILEY, ROBERTSON AND WAMBSGANS AND REVIEW AND REVISE SAME (.8).
11/2/2006	JEAN R ROBERTSON	0.20	80.00	REVIEW COURT DOCKET.
11/10/2006	JEAN R ROBERTSON	0.10	40.00	REVIEW COURT DOCKET UPDATE.
11/14/2006	JEAN R ROBERTSON	0.10	40.00	REVIEW COURT DOCKET UPDATE.
12/7/2006	JEAN R ROBERTSON	0.10	40.00	REVIEW COURT DOCKET UPDATE.
12/11/2006	JEAN R ROBERTSON	0.20	80.00	REVIEW COURT DOCKET UPDATES.
12/19/2006	JEAN R ROBERTSON	0.20	80.00	REVIEW COURT DOCKET UPDATES.
12/20/2006	JEAN R ROBERTSON	0.10	40.00	REVIEW COURT DOCKET UPDATE.
12/27/2006	JEAN R ROBERTSON	0.20	80.00	REVIEW COURT DOCKET UPDATES.
1/15/2007	JEAN R ROBERTSON	0.10	41.00	REVIEW COURT DOCKET UPDATES.
1/17/2007	JEAN R ROBERTSON	0.10	41.00	REVIEW COURT DOCKET UPDATE.
1/18/2007	JEAN R ROBERTSON	0.20	82.00	REVIEW COURT DOCKET UPDATES.
1/19/2007	JEAN R ROBERTSON	0.20	82.00	REVIEW COURT DOCKET UPDATES.
1/22/2007	JEAN R ROBERTSON	0.20	82.00	REVIEW COURT DOCKET UPDATES.
1/24/2007	JEAN R ROBERTSON	0.10	41.00	REVIEW COURT DOCKET UPDATES.
1/31/2007	JEAN R ROBERTSON	0.20	82.00	REVIEW COURT DOCKET UPDATES.
2/5/2007	JEAN R ROBERTSON	0.30	123.00	REVIEW COURT DOCKET UPDATES AND MISCELLANEOUS
SUBTOTAL		3.50	1,207.00	

PREPARATION OF RETENTION AND FEE APPLICATIONS				
Date	Name / Invoice Number	Hours	Amount	Description
10/17/2006	JEAN R ROBERTSON	0.60	240.00	PHONE CALL WITH D. MARSHALL REGARDING PREPARATION OF RETENTION APPLICATION (.2); REVIEW FIRST DRAFT OF SAME (.4).
10/18/2006	DEBORAH G MARSHALL	0.30	51.00	DISCUSSION WITH J. ROBERTSON RE RETENTION APPLICATION (.2); DISCUSSIONS WITH C. RHODES RE CONFLICT CHECK (.1).
10/19/2006	DEBORAH G MARSHALL	0.60	102.00	ATTENTION TO CONFLICT CHECK OF PARTIES IN INTEREST RE RETENTION APPLICATION AS SPECIAL COUNSEL.
10/23/2006	DEBORAH G MARSHALL	0.60	102.00	ATTENTION TO RETENTION APPLICATION AND SERVICE LIST.
10/24/2006	DEBORAH G MARSHALL	1.50	255.00	DISCUSSION WITH J. ROBERTSON RE CONFLICT SCHEDULE (.1); DRAFT SUMMARY RE SAME FOR INCLUSION IN RETENTION APPLICATION (.9); REVISE APPLICATION RE SAME (.5).
10/24/2006	JEAN R ROBERTSON	0.40	160.00	CONFERENCE WITH D. MARSHALL REGARDING STATUS OF EXHIBITS FOR RETENTION APPLICATION (.3); PHONE CALL TO T. ZAINO (.1).
10/25/2006	DEBORAH G MARSHALL	1.20	204.00	DISCUSSION WITH J. ROBERTSON RE RETENTION APPLICATION AND ATTENTION TO SAME.
10/26/2006	JEAN R ROBERTSON	2.20	880.00	DRAFT, EDIT AND FINALIZE RETENTION APPLICATION, AFFIDAVIT, CONFLICTS AND PROPOSED ORDER (1.9); CIRCULATE TO BAKER & HOSTETLER AND CLIENT FOR REVIEW (.3).
10/27/2006	JEAN R ROBERTSON	1.10	440.00	REVIEW DECLARATION FOR RETENTION APPLICATION AND ATTENTION TO CONFLICT REVIEW.
10/30/2006	JEAN R ROBERTSON	2.30	920.00	EDIT AND FINALIZE RETENTION APPLICATION, INCLUDING CALL WITH CLIENT REGARDING SAME (2.0); REVIEW WITH D. MARSHALL FOR FILING AND SERVICE (.2).
10/30/2006	DEBORAH G MARSHALL	1.20	204.00	DISCUSSION WITH J. ROBERTSON RE FILING APPLICATION (.2); DRAFT NOTICE OF FILING RETENTION APPLICATION (.4); DRAFT CERTIFICATE OF SERVICE RE SAME (.2); FINALIZE APPLICATION AND NOTICE AND FILE AND SERVICE OF DOCUMENTS (.5).
11/14/2006	CHRISTINE P BUDDNER	0.30	40.50	REVIEWED DOCKET FOR CERTIFICATE OF NO OBJECTIONS (.10); PHONE CALL TO AND FROM CASE ADMINISTRATOR RE: ORDER PROCEDURE (.20).
11/21/2006	DEBORAH G MARSHALL	0.80	136.00	DRAFT ORDER RE RETENTION OF MCDONALD HOPKINS (.5); REVIEW AND REVISE SAME AND SUBMIT SAME TO COURT (.3).
11/28/2006	DEBORAH G MARSHALL	0.20	34.00	E-MAIL TO J. ROBERTSON RE MCDONALD HOPKINS RETENTION ORDER AND MONTHLY COMPENSATION OF PROFESSIONALS.
12/18/2006	DEBORAH G MARSHALL	0.80	136.00	DRAFT LETTER TO PARTIES IN INTEREST RE

PREPARATION OF RETENTION AND FEE APPLICATIONS				
Date	Name / Invoice Number	Hours	Amount	Description
				MONTHLY STATEMENT FOR FEES AND EXPENSES PURSUANT TO INTERIM COMPENSATION ORDER (.7); DISCUSSION WITH J. ROBERTSON RE SAME (.1).
12/18/2006	JEAN R ROBERTSON	0.20	80.00	FOLLOW UP REGARDING RETENTION ORDER STATUS.
12/4/2006	DEBORAH G MARSHALL	0.60	102.00	DRAFT CERTIFICATE OF SERVICE OF ORDER RE RETENTION OF MCDONALD HOPKINS AND SERVE ORDER.
12/14/2006	DEBORAH G MARSHALL	0.30	51.00	PREPARE E-MAIL TO J. ROBERTSON AND A. TODDY RE MONTHLY FEE REQUESTS AND STATUS.
12/19/2006	DEBORAH G MARSHALL	0.80	136.00	DRAFT LETTER TO PARTIES IN INTEREST PER INTERIM COMPENSATION ORDER RE MONTHLY STATEMENT FOR NOVEMBER TIME AND SERVE SAME.
1/19/2007	DEBORAH G MARSHALL	0.30	51.00	ATTENTION TO SERVICE OF MONTHLY STATEMENT PER INTERIM COMPENSATION ORDER, INCLUDING DRAFTING LETTER TO PARTIES IN INTEREST.
2/23/2007	DEBORAH G MARSHALL	5.00	850.00	DRAFT FINAL FEE REQUEST AND EXHIBITS THERETO.
2/26/2007	JEAN R ROBERTSON	0.80	320.00	REVIEW AND REVISE FINAL FEE REQUEST.
2/28/2007	DEBORAH G MARSHALL	2.00	340.00	FINALIZE AND FILE AND SERVE FINAL FEE REQUEST.
SUBTOTAL		24.10	5,834.50	

TRAVEL				
Date	Name / Invoice Number	Hours	Amount	Description
10/24/2006	JEAN R ROBERTSON	1.70	680.00	TRAVEL TO AND FROM AKRON BANKRUPTCY COURT.
SUBTOTAL		1.70	680.00	
TOTAL FEES INCURRED		92.70	32,030.00	
LESS 50% FOR HOLDBACK		0.85	340.00	
TOTAL FEE REQUEST		91.85	31,690.00	