

Debtors, filed its application (the "Application") for allowance of compensation for professional services performed by GDC for the period from April 12, 2002, through October 9, 2002, and for reimbursement of its actual and necessary expenses incurred during that period.

On November 15, 2002, the United States Trustee filed its Objection Regarding Applications for Final Allowance of Compensation and for Reimbursement of Out of Pocket Expenses (the "Objection"), which related to the final fee applications of numerous professionals retained in these chapter 11 cases. With respect to GDC's Application, the United States Trustee articulated three points of objection: (i) that the Application sought compensation for travel time at GDC's full hourly rates, whereas the United States Trustee would approve compensation for such time at one-half GDC's hourly rates; (ii) that the Application sought reimbursement of the expense of hiring an outside proofreader in the amount of \$407.63, and (iii) that certain portions of the detailed report of services rendered that was annexed to the Application as Exhibit D had been redacted.

In response to the Objection, GDC has agreed to reduce the amount of compensation sought for travel time by one-half, and has agreed not to seek reimbursement for the expense outside proofreading services. As a result, GDC now seeks compensation for services rendered in the amount of \$5,318,522.75 and reimbursement of expenses incurred in the amount of \$321,571.02.

Furthermore, GDC has concluded upon review that certain previously redacted portions of its billing record may at this time become public. Accordingly, a revised detailed report of services rendered is annexed hereto as Exhibit A.

Dated: New York, New York
December 3, 2002

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Conor D. Reilly
Conor D. Reilly (CR-6559)
M. Natasha Labovitz (MNL-5153)
200 Park Avenue
New York, New York 10166-0193
(212) 351-4000

Attorneys for the Reorganized Debtors

EXHIBIT A