

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
INACOM CORP., et al,¹) Case No. 00-2426 (PJW)
Debtors.) Jointly Administered

Hearing: 9/19/03 at
9:30AM
OBJECTIONS: 8/4/03 at
4:00PM

**THIRD QUARTERLY AND FINAL FEE APPLICATION OF
MCDONALD HOPKINS CO., LPA FOR COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS
SPECIAL COUNSEL FOR DEBTORS AND DEBTORS IN POSSESSION
FOR THE PERIOD FROM JULY 1, 2002 THROUGH JUNE 8, 2003**

Name of Applicant: McDonald Hopkins Co., LPA²
Authorized to Provide Professional Services to: InaCom Corp., et al.
Date of Retention: July 1, 2002
Period for which Compensation Sought is Actual, Reasonable and Necessary: July 1, 2002 through June 8, 2003
Amount of Fees Reimbursement Sought as Actual, Reasonable and Necessary: \$537,386.50 *
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary: \$45,124.36*

*Less \$472,189.07 previously paid by the Debtors Pursuant to the Administrative Order. (defined below).

¹ The Debtors are the following entities: InaCom Corp.; InaCom Latin America; InaCom Solutions, Inc., InaCom Communications, Inc.; InaCom Financial Services, Inc.; Perigee Communications, Inc.; Networks, Inc.; Gorham Clark, Inc.; InaCom International, Inc., InaCom Tennessee, Inc.; InaCom Professional Services, Inc.; Kure Associates, Inc.; Office Products of Minnesota, Inc.; Boston Computer Exchange Corporation; PC Technical Services, Inc.; Vanstar Corporation; Computerland International Development; Inc.; Computerport World Trade, Inc.; Vanstar International Corporation; VST West, Inc.; VST Illinois, Inc.; VSTNC, Inc.; Cland Tex, Inc.; InaCom Government Systems, Inc.; Contract Data, Inc.; Computer Professionals, Inc.; Vanstar Professional Technical Services, Inc.

² Formerly known as McDonald, Hopkins, Burke & Haber Co., L.P.A.

This is an: _____ interim x final application.

The total time expended for this Third Quarterly and Final Fee Application preparation is approximately 9.5 hours and the corresponding compensation requested is approximately \$9,500.00.³

PRIOR FEE APPLICATIONS FILED:

Date Filed	Period Covered	Total Fees Requested	Interim Requested Fees (Less 20% Holdback)	Interim Requested Expenses	Interim Payment Made	Court Approved Fees	Court Approved Expenses
09/20/02	07/01/02-07/31/02	\$22,993.50	\$18,394.80	\$1,402.62	Yes	\$22,993.50	\$1,402.62
10/09/02	08/01/02-08/31/02	\$23,487.50	\$18,790.00	\$1,314.41	Yes	\$23,487.50	\$1,314.41
11/01/02	09/01/02-09/30/02	\$53,734.00	\$42,987.20	\$1,409.48	Yes	\$53,734.00	\$1,409.48
12/10/02	10/01/02-10/31/02	\$74,727.00	\$59,781.60	\$8,268.78	Yes	\$74,727.00	\$8,268.78
12/31/02	11/01/02-11/30/02	\$64,316.00	\$51,452.80	\$2,543.60	Yes	\$64,316.00	\$2,543.60
02/19/03	12/01/02-12/31/02	\$60,660.50	\$48,528.40	\$6,605.17	Yes	\$60,660.50	\$6,605.17
02/26/03	01/01/03-01/31/03	\$74,616.00	\$59,692.80	\$5,480.21	Yes	\$74,616.00	\$5,480.21
04/02/03	02/01/03-02/28/03	\$50,438.00	\$40,350.40	\$2,684.18	Yes	\$50,438.00	\$2,684.18
05/15/03	03/01/03-03/31/03	\$27,548.00	\$20,038.40	\$2,873.14	Yes	\$27,548.00	\$2,873.14
06/09/03	04/01/03-04/30/03	\$25,620.00	\$20,496.00	\$3,868.93	No	\$25,620.00	\$3,868.93
06/26/03	05/01/03-05/31/03	\$52,068.00	\$41,654.00	\$6,711.13	No	Pending	Pending

³ The actual number of hours expended preparing this Third Quarterly and Final Fee Application and the corresponding compensation requested will be set forth in MH's subsequent fee applications.

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 Hours Billed	Total Compensation
Robertson, Jean R.	Shareholder, 1990 Business Restructuring	\$290	481.40	\$139,722.00
Searby, Edmund W.	Shareholder, 1990 Litigation	\$265	283.10	\$75,246.50
Salerno, Matthew A.	Associate, 2 years, 1999 Business Restructuring	\$175	767.30	\$128,720.00
Gonyer, Todd E.	Associate, 2 years, 1998 Litigation	\$165	868.10	\$142,080.50
Carothers, Patrick W.	Associate, .5 years, 2000, Business Restructuring	\$160	82.70	\$13,232.00
Dahl, Sherri L.	Associate, 4 months, 2000 Business Restructuring	\$160	54.20	\$8,672.00
Marshall, DeBorah	Legal Assistant, 17 years Business Restructuring	\$150	3.60	\$522.00
Rechner, Matthew R.	Associate, 2.5 years, 2001 Litigation	\$145	19.90	\$2,885.00
Kreeger, Dolores	Legal Assistant, 14 years Litigation	\$125	8.20	\$1,025.00
Butler, Julie A.	Legal Assistant, 4 years Litigation	\$120	13.60	\$1,632.00
Buddner, Christine	Legal Assistant, 2 years Business Restructuring	\$100	133.10	\$13,144.00
Kaczka, Michael J.	Law Clerk, Business Restructuring	\$ 70	33.70	\$2,359.00
Macon, Antoinette	Project Assistant Business Restructuring	\$40	24.20	\$968.00

GRAND TOTAL: \$ 530,208.50
TOTAL HOURS: 2,773.50
BLENDED RATE: \$191.16

COMPENSATION BY PROJECT CATEGORY

<u>PROJECT CATEGORY</u>	<u>TOTAL HOURS</u>	<u>TOTAL FEES</u>
General Administration	104.30	\$ 15,618.00
Litigation	2552.10	\$ 498,466.50
Retention/Fee Application	117.10	\$ 16,124.00
TOTALS:	2,773.50	\$ 530,208.50

EXPENSE SUMMARY

July 1, 2002 through June 8, 2003, Inclusive

<u>EXPENSE CATEGORY</u>	<u>SERVICE PROVIDE</u>	<u>TOTAL EXPENSE</u>
PHOTOCOPIES:		
- Internal		\$ 7,488.20
- External	Uniscribe Professional Services, Inc.	\$ 596.76
	IKON Office Solutions	\$ 1,037.20
COMMUNICATION:		\$ 467.20
DELIVERY:	Federal Express	\$ 628.21
	TGC	\$ 106.50
RESEARCH:	Westlaw	\$ 5,463.93
	Lexis	\$ 125.69
	Pacer	\$ 366.73
TRAVEL:		\$ 24,771.74
MISCELLANEOUS:		
- Court Reporter		\$ 3,542.50
- Reversal from Void Ck. No. 135982		\$ (1,433.01)
TOTAL DISBURSEMENTS		\$ 43,161.45

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) Chapter 11
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) Case No. 00-2426 (PJW)
Debtors.)
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) Jointly Administered
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**THIRD QUARTERLY AND FINAL FEE APPLICATION OF MCDONALD
HOPKINS CO., LPA FOR COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL FOR
DEBTORS FOR PERIOD COVERING JULY 1, 2002 THROUGH JUNE 8, 2003**

Pursuant to §§ 330 and 331 of Title 11 of the United States Bankruptcy Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the Court’s Administrative Order Pursuant to §§ 105(a) and 331 of the Bankruptcy Code Establishing Procedures for Allowance and Payment of Monthly Interim Compensation and Reimbursement of Expenses of Professionals, as modified on December 12, 2000 (the “Administrative Order”) McDonald Hopkins Co., LPA² (“MH”) hereby files this third quarterly and final fee application (the “Application”), requesting this Court enter an Order awarding it reasonable compensation with respect to the bankruptcy cases of the above-captioned Debtors (collectively the “Debtors”) for professional legal services rendered to the Debtors in the amount

¹ The Debtors are the following entities: InaCom Corp.; InaCom Latin America; InaCom Solutions, Inc., InaCom Communications, Inc.; InaCom Financial Services, Inc.; Perigee Communications, Inc.; Networks, Inc.; Gorham Clark, Inc.; InaCom International, Inc., InaCom Tennessee, Inc.; InaCom Professional Services, Inc.; Kure Associates, Inc.; Office Products of Minnesota, Inc.; Boston Computer Exchange Corporation; PC Technical Services, Inc.; Vanstar Corporation; Computerland International Development; Inc.; Computerport World Trade, Inc.; Vanstar International Corporation; VST West, Inc.; VST Illinois, Inc.; VSTNC, Inc.; Cland Tex, Inc.; InaCom Government Systems, Inc.; Contract Data, Inc.; Computer Professionals, Inc.; Vanstar Professional Technical Services, Inc.

² Formerly known as McDonald, Hopkins, Burke & Haber Co., L.P.A.

of \$537,386.50³, together with reimbursement for actual and necessary expenses incurred in the amount of \$45,124.36⁴ for the period of July 1, 2002 through June 8, 2003, inclusive (the “Final Fee Period”), less any amounts previously paid by the Debtors pursuant to the Administrative Order. In support of its Application, MH respectfully represents as follows:

BACKGROUND

1. By Application dated May 9, 2002 [Docket No. 3059], the Debtors requested authority to employ and retain Hahn Loeser & Parks LLP (“HLP”) as special counsel for the Debtors, pursuant to § 327(e) of the Bankruptcy Code, to provide legal services necessary to investigate and, if necessary, prosecute avoidance actions against certain pre-petition professionals of the Debtors. On June 14, 2002 the Court entered its Order Authorizing Employment and Retention *Nunc Pro Tunc* to April 23, 2002 of Hahn Loeser & Parks LLP as Special Counsel for Debtors and Debtors in Possession in Connection with Investigating and, if Necessary, Prosecuting on Behalf of Debtors Avoidance Actions Against Professionals [Docket No. 3326].

2. Effective July 1, 2002, Jean R. Robertson, the HLP partner principally responsible for the Debtors’ engagement, withdrew from HLP and joined another law firm. As a result, other than in connection with its fee application, HLP ceased rendering services to the Debtors on June 30, 2002. On July 22, 2002, MH filed an Application for Order Under § 327(e) of the Bankruptcy Code Authorizing the Employment and Retention *Nunc Pro Tunc* of McDonald, Hopkins, Burke & Haber Co., LPA as Substitute Special Counsel in Connection with

³ Representing \$100,215.00 for the first application period of July 1, 2002 through September 30, 2002; \$274,319.50 for the second application period of October 1, 2002 through January 31, 2003, and \$162,852.00 for the Final Fee Period of February 1, 2003 through June 8, 2003.

⁴ Representing \$4,126.51 for the first application period of July 1, 2002 through September 30, 2002, \$22,897.76 for the second application period of October 1, 2002 through January 31, 2003, and \$18,100.09 for the Final Fee Period February 1, 2003 through June 8, 2003.

Investigating and, if Necessary, Prosecuting on Behalf of Debtors Avoidance Actions Against Professionals Under Chapter 5 of the Bankruptcy Code. On August 13, 2002 [Docket No. 3609] this Court entered an Order approving MH's retention as substitute special counsel to the Debtors *nunc pro tunc* to July 1, 2002 (the "MH Retention Order").

3. MH has received payments in the amount of \$472,189.07⁵ for services rendered and reimbursement of expenses incurred in these cases. No agreement or understanding exists between MH and any other entity for the sharing of compensation to be received for services rendered in or in connection with these cases.

4. MH's First Monthly Fee Application for fees incurred and services rendered in the amount of \$24,396.12 for the period July 1, 2002, through July 31, 2002, was filed on September 20, 2002, a copy of which will be furnished upon request. A Certificate of No Objection was filed on October 14, 2002 [Docket No. 3830].

5. MH's Second Monthly Fee Application for fees incurred and services rendered in the amount of \$24,801.91 for the period August 1, 2002, through August 31, 2002, was filed on October 10, 2002, a copy of which will be furnished upon request. A Certificate of No Objection was filed on November 22, 2002 [Docket No. 4018].

6. MH's Third Monthly Fee Application for fees incurred and services rendered in the amount of \$55,143.48 for the period September 1, 2002, through September 30, 2002, was filed on November 1, 2002, a copy of which will be furnished upon request. A Certificate of No Objection was filed on November 20, 2003 [Docket No. 3984].

7. MH's Fourth Monthly Fee Application for fees incurred and services rendered in the amount of \$82,995.78 for the period October 1, 2002, through October 31, 2002, was filed on

⁵ Representing \$104,341.51 for the period July 1, 2002 through September 30, 2002, \$297,217.26 for the period October 1, 2002 through January 31, 2003 and \$70,630.30 for the period February 1, 2003 through June 8, 2003.

December 10, 2002, a copy of which will be furnished upon request. A Certificate of No Objection was filed on January 2, 2003 [Docket No. 4209].

8. MH's Fifth Monthly Fee Application for fees incurred and services rendered in the amount of \$66,859.60 for the period November 1, 2002, through November 30, 2002, was filed on December 31, 2002, a copy of which will be furnished upon request. A Certificate of No Objection was filed on January 21, 2003 [Docket No. 4302].

9. MH's Sixth Monthly Fee Application for fees incurred and services rendered in the amount of \$67,265.67 for the period December 1, 2002, through December 31, 2002, was filed on February 20, 2003, a copy of which will be furnished upon request. A Certificate of No Objection was filed on March 13, 2003 [Docket No. 4605].

10. MH's Seventh Monthly Fee Application for fees incurred and services rendered in the amount of \$80,096.21 for the period January 1, 2003, through January 31, 2003, was filed concurrently with the Application on February 25, 2003, a copy of which will be furnished upon request. A Certificate of No Objection was filed on March 18, 2003. [Docket No. 4625].

11. MH's Eighth Monthly Fee Application for fees incurred and services rendered in the amount of \$53,122.18 for the period February 1, 2003, through February 28, 2003, was filed on April 2, 2003, a copy of which will be furnished upon request. A Certificate of No Objection was filed on April 23, 2003 [Docket No. 5016].

12. MH's Ninth Monthly Fee Application for fees incurred and services rendered in the amount of \$30,421.14 for the period March 1, 2003, through March 31, 2003, was filed on May 15, 2003, a copy of which will be furnished upon request. A Certificate of No Objection was filed on June 5, 2003 [Docket No. 5214].

13. MH's Tenth Monthly Fee Application for fees incurred and services rendered in the amount of \$29,488.93 for the period April 1, 2003, through April 30, 2003, was filed on June

9, 2003, a copy of which will be furnished upon request. A Certificate of No Objection was filed on July 1, 2003 [Docket No. 5265].

14. MH's Eleventh Monthly Fee Application for fees incurred and services rendered in the amount of \$58,779.13 for the period May 1, 2003, through May 31, 2003, was filed on June 26, 2003, a copy of which will be furnished upon request.

15. MH further applies for compensation for fees incurred and services rendered in the amount of \$9,140.71, for the period June 1, 2003 through June 8, 2003. MH did not file a Monthly Fee application for this amount and respectfully request this amount be incorporated into this Application.

SUMMARY OF SERVICES RENDERED

16. The attorneys of MH who have rendered professional services in these cases during the Final Fee Period are: Jean R. Robertson, Edmund W. Searby, Matthew A. Salerno, Todd E Gonyer, Patrick W. Carothers, Sherri L. Dahl, and Matthew R. Rechner. Summer associate, Michael J. Kaczka, provided law clerk services. Christine P. Buddner, Julie A. Butler, Dolores Kreeger, DeBorah Marshall and Antoinette Macon provided paraprofessional services.

17. MH's requested allowance of final compensation for services rendered and reimbursement for expenses incurred reflects the requisite time, skill, and effort expended towards the goals of assisting the Debtors in investigating and prosecuting avoidance actions against certain of the Debtors' prepetition professionals and other service providers (the "Service Providers").

SUMMARY OF SERVICES BY CATEGORY

18. The services rendered by MH during the Final Fee Period are set forth below by category. The attorneys, paraprofessionals and law clerks that rendered services relating to each category are identified below, along with the number of hours for each individual and the total

compensation sought for each category. Aggregate and Attorney Time Summaries by Matter are described in Exhibit "A" attached hereto.

A. General Administration:

(Fees - \$15,618.00; Total Hours – 104.30)

MH attended to routine case management matters, including preparing updates on critical dates in accordance with the Court's docket calendar (e.g., hearing dates and response deadlines); docketing pleadings and other documents in the Debtors' cases; preparing service lists for the submission of pleadings to the Court; drafting certificates of service for pleadings filed; and filing and serving documents.

B. Litigation

(Fees - \$498,466.50; Total Hours – 2,552.10)

On June 11, 2002, the Debtors filed 15 adversary proceedings (the "Adversary Proceedings") seeking the avoidance of prepetition payments against fifteen separate Service Providers. Since the Adversary Proceeding filings, MH's services involved the review and analysis of information provided by the Debtors as to the timing and nature of payments made to numerous Service Providers prior to the Petition Date. MH also reviewed information available from filings in these cases as to those Service Providers who were retained in these cases. Further, MH engaged in discussions with counsel for such Service Providers tolling such proceedings while the parties engaged in informal discovery, and in some cases, settlement discussions. MH reviewed and analyzed information provided by certain Service Providers in response to informal discovery requests. Since filing the Adversary Proceedings on June 11, 2002 eleven Adversary Proceedings have either been dismissed or settled.

During the Final Fee Period, MH continued to provide services related to the formal discovery phase of the pending Adversary Proceedings. These tasks include reviewing

documents from the various Service Providers, telephone conferences with counsel for the Service Providers related to same, and in some instances, settlement discussions. MH continued to spend time and resources conducting research regarding the allegations raised in the Adversary Proceedings, certain defenses, and analyzing the application of such research to the facts of each case.

Finally, the services rendered by MH during the Final Fee Period included participating and/or concluding settlement negotiations pertaining to virtually all of the Adversary Proceedings. These services included the review and analysis of discovery documents, involvement in the negotiations of settlement proposals, and continuous communication and exchange of documentation with counsel for the Service Providers. MH also prepared for the depositions of Ernst & Young and Willkie Farr & Gallagher, which included reviewing and responding to discovery responses and requests and preparing interrogatories.

Notably, of the fifteen total Adversary Proceedings that were filed on June 11, 2002, nine have been settled, two were dismissed, and four are still pending. With respect to the nine Adversary Proceedings that were settled, the total value of the Debtors' claims were \$4,986,582. For these same nine Adversary Proceedings, the Debtors have recovered the total amount of \$3,023,611 (in both the form of cash and claim waivers), which translates into a 61% recovery to the estates. With respect to the remaining four Adversary Proceedings that are pending, they are: Willkie Farr & Gallagher [\$2,900,000]; Schulte, Roth & Zabel [\$480,550.88]; Ernst & Young [\$435,278.43]; and Goldman Sachs [\$1,500,000]⁶, MH will work with the liquidation trustee, in continuing its prosecution of these remaining Adversary Proceedings.

⁶ The Debtors and Goldman Sachs have reached an agreement to settle this Adversary Proceeding; which is being documented presently. The settlement will provide the estates 48% to 99% of the \$1,500,000.

C. **Retention and Fee Application**

(Fees - \$16,124.00; Total Hours – 117.10)

MH prepared and filed its Eight, Ninth, Tenth and Eleventh Monthly Fee Applications (the “Fee Applications”) for compensation for services provided as Special Counsel to the Debtors.

DISBURSEMENTS

19. MH has incurred out-of-pocket expenses during the Final Fee Period in the amount of \$45,124.36 in the rendering of professional services. Such expenses were necessary and reasonable in scope and amount and do not include a charge for profit. The expenses are broken down into categories of charges, including, among other things, duplication, computer research charges, telecopies, delivery services, filing fees, publication fees, etc. Moreover, the expenses incurred comply with the provisions of Local Bankruptcy Rule 32. A complete review by category of the expenses incurred for the Interim Fee Period may be found in the Fee Applications previously filed with the court (a copy of which will be furnished upon request).

20. MH represents that its rate for duplication is \$0.20 per page; its effective rate for outgoing telecopies transmissions is at actual long distance telephone cost, there is no charge for incoming telecopier transmissions; computer research charges are billed to clients at actual cost, which does not include amortization for maintenance or equipment; postal, overnight delivery and courier services are billed at actual cost; and miscellaneous expenses, *i.e.*, filing fees, publication fees, travel and meeting expenses, etc. are billed to clients at actual cost.

VALUATION OF SERVICES

21. Attorneys and paraprofessionals of MH have expensed a total of 2,773.50 hours in connection with this matter during the Interim Fee Period as follows:

<u>SHAREHOLDERS</u>	<u>TOTAL HOURS</u>
Robertson, Jean R.	481.40
Searby, Edmund W.	283.10

<u>ASSOCIATES</u>	<u>TOTAL HOURS</u>
Salerno, Matthew A.	767.30
Gonyer, Todd E.	868.10
Carothers, Patrick W.	82.70
Dahl, Sherri L.	54.20
Rechner, Matthew R.	19.90

<u>LAW CLERKS</u>	<u>TOTAL HOURS</u>
Kaczka, Michael J.	33.70

<u>PARAPROFESSIONALS</u>	<u>TOTAL HOURS</u>
Marshall, DeBorah	3.60
Kreeger, Dolores	8.20
Butler, Julie A.	13.60
Buddner, Christine P.	133.10
Macon, Antoinete	24.20

The hourly rates for these services are as follows:

<u>SHAREHOLDERS</u>	<u>RATE</u>
Robertson, Jean R.	\$ 290.00
Searby, Edmund W.	\$ 265.00

<u>ASSOCIATES</u>	<u>RATE</u>
Salerno, Matthew A.	\$175.00
Gonyer, Todd E.	\$165.00
Carothers, Patrick W.	\$160.00
Dahl, Sherri L.	\$160.00
Rechner, Matthew R.	\$145.00

23. MH believes that the time entries included in the Fee Applications previously filed with the Court are in compliance with the requirements of Local Bankruptcy Rule 32.

24. In accordance with the factor enumerated in 11 U.S.C. § 330, the amount requested is fair and reasonable given; (a) the complexity of these cases; (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, McDonald Hopkins Co., LPA requests an Order approving the fees and expenses incurred during the Final Fee Period for the benefit of the Debtors and that allowance be made in it in the sum of \$537,386.50 as compensation for necessary professional services rendered to the Debtors during the Final Fee Period, and the sum of \$45,124.36 for reimbursement of necessary costs and expenses, for a total of \$537,386.50, and further request such other and further relieve as this Court may deem just and proper.

July 14, 2003

Respectfully submitted,



Jean R. Robertson (0069252)
McDONALD HOPKINS CO., LPA
2100 Bank One Center
600 Superior Avenue, E.
Cleveland, Ohio 44114-2653
Telephone: (216) 348-5400
Facsimile: (216) 348-5474
E-Mail: jrobertson@MH.com

SPECIAL COUNSEL FOR INACOM
CORP. AND ITS AFFILIATED
DEBTORS, ON BEHALF OF THE
ESTATE OF DEBTORS INACOM CORP.,
ET AL.

VERIFICATION

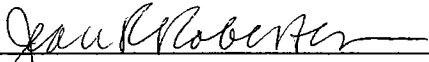
STATE OF OHIO)
) ss:
COUNTY OF CUYAHOGA)

JEAN R. ROBERTSON, being duly sworn, deposes and says:

1. I am a member of the firm of McDonald Hopkins Co., LPA ("MH"), which maintains offices for the practice of law at 2100 Bank One Center, 600 Superior Avenue, E., Cleveland, Ohio 44114.

2. I have personally performed many of the legal services rendered by MH as special counsel to the Debtors and am thoroughly familiar with the other work performed on behalf of the Debtors by the lawyers and paraprofessionals of MH.

3. I have reviewed the foregoing Application and the facts set forth are true and correct to the best of my knowledge, information and belief. Moreover, I have reviewed Local Bankruptcy Rules (Amended Effective February 1, 2001) and submit that to my knowledge the Application complies with such Local Rules.



Jean R. Robertson

SUBSCRIBED AND SWORN to before me this 14th day of July, 2003.



Notary Public

MARY ANN LUNDBLAD
Notary Public, State of Ohio
My Commission Expires April 3, 2005

EXHIBIT "A"

ATTORNEY TIME SUMMARY BY MATTER

<u>GENERAL ADMINISTRATION</u>	<u>TOTAL HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL AMOUNT</u>
Robertson, Jean R.	28.70	\$290.00	\$8,323.00
Searby, Edwin W.	4.80	265.00	\$1,272.00
Salerno, Matthew A.	3.70	150.00	\$555.00
Buddner, Christine P.	25.20	95.00	\$2,394.00
Buddner, Christine P.	14.70	100.00	\$1,470.00
Macon, Antoinette	22.90	40.00	\$916.00
Dahl, Sherri L.	4.30	160.00	\$688.00
TOTALS:	104.30		\$15,618.00

<u>LITIGATION</u>	<u>TOTAL HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL AMOUNT</u>
Robertson, Jean R.	430.10	\$290.00	\$125,019.00
Searby, Edmund W.	36.00	260.00	\$9,360.00
Searby, Edmund W.	242.30	265.00	\$64,209.50
Salerno, Matthew A.	218.60	150.00	\$32,790.00
Salerno, Matthew A.	545.00	175.00	\$95,375.00
Gonyer, Todd E.	57.80	145.00	\$8,381.00
Gonyer, Todd E.	810.30	165.00	\$133,980.00
Carothers, Patrick W.	82.70	160.00	\$13,232.00
Dahl, Sherri W.	49.90	160.00	\$7,984.00
Rechner, Matthew R.	19.90	145.00	\$2,885.00
Kreeger, Delores	8.20	125.00	\$1,025.00
Butler, Julie A.	13.60	120.00	\$1,632.00
Buddner, Christine P.	4.00	100.00	\$400.00
Kaczka, Michael J.	33.70	70.00	\$2,359.00
TOTALS:	2,552.10		\$498,466.50

<u>RETENTION AND FEE APPLICATION</u>	<u>TOTAL HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL AMOUNT</u>
Robertson, Jean R.	23.00	\$290.00	\$6,670.00
Marshall, DeBorah G.	3.60	145.00	\$522.00
Buddner, Christine P.	8.00	95.00	\$760.00
Buddner, Christine P.	81.20	100.00	\$8,120.00
Macon, Anotinette	1.30	40.00	\$52.00
TOTALS:	117.10		\$16,124.00