

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

IN RE: :
: Jointly Administered
Montgomery Ward Holding Corp., a : Case No. 97-1409 (PJW)
Delaware corporation, et al., :
: Chapter 11
Debtors. :

**FOURTH AND FINAL APPLICATION OF
TROOP STEUBER PASICH REDDICK & TOBEY, LLP FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Name of Applicant: Troop Steuber Pasich Reddick & Tobey, LLP

Authorized to Provide Professional Services to: Debtors

Date of Retention Order: June 16, 1998
(nunc pro tunc as of February 1, 1998)

Period for which final compensation and reimbursement are sought: February 1, 1998 -
July 31, 1999

Total amount of compensation sought as actual, reasonable and necessary: \$ 356,649.75

Total amount of expense reimbursement sought as actual, reasonable and necessary: \$ 34,725.94

This is an Interim X Final Application

The total time expended for the preparation of this application is approximately nine (9) hours, and the corresponding compensation is not requested herein.

INTERIM APPLICATIONS FILED

<u>Date Filed</u>	<u>Period Covered</u>	<u>Requested Fees, Expenses</u>	<u>Approved Fees, Expenses</u>
8/14/98	<u>2/1/98-6/30/98</u>	\$264,518.72	Pending
12/14/98	7/1/98-10/31/98	\$30,248.35	Pending
4/13/99	11/1/98-2/28/99	\$4,842.82	Pending

Handwritten notes:
3/1/99 - 7/31/99
\$ 91,765.80
299,609.89 total
391,375.69

Handwritten number: 5500

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

IN RE:	:	
	:	Jointly Administered
Montgomery Ward Holding Corp., a	:	Case No. 97-1409 (PJW)
Delaware corporation, <u>et al.</u> ,	:	
	:	Chapter 11
Debtors.	:	

**FOURTH AND FINAL APPLICATION OF
TROOP STEUBER PASICH REDDICK & TOBEY, LLP FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

TROOP STEUBER PASICH REDDICK & TOBEY, LLP ("TSPR&T"), special counsel of the above captioned Debtors and Debtors in Possession, hereby makes this Fourth and Final Application for Allowance of Compensation and Reimbursement of Expenses (the "Application").

In this Application, TSPR&T seeks final Court approval of fees of \$356,649.75 and reimbursement of expenses incurred of \$34,725.94, for a total award of \$391,375.69 for the period February 1, 1998 through July 31, 1999 (the "Final Compensation Period"). This final amount consists of:

(a) interim fees of \$240,567.00 and reimbursement of expenses of \$23,951.72 for the period February 1, 1998 through June 30, 1998 (the "First Interim Period"). The First Fee Application of TSPR&T in which these fees and expenses are requested is attached hereto (without exhibits) in group Exhibit G and incorporated herein by reference;

(b) interim fees of \$27,861.00 and reimbursement of expenses of \$2,387.35 for the period July 1, 1998 through October 31, 1998 (the "Second Interim Period"). The Second Fee Application of TSPR&T in which these fees

and expenses are requested is attached hereto (without exhibits) in group Exhibit G and incorporated herein by reference;

(c) interim fees of \$4,126.00 and reimbursement of expenses of \$716.82 for the period November 1, 1998 through February 28, 1999 (the "Third Interim Period"). The Third Fee Application of TSPR&T in which these fees and expenses are requested is attached hereto (without exhibits) in group Exhibit G and incorporated herein by reference;

(d) interim fees of \$84,095.75 and reimbursement of expenses of \$7,670.05 for the period March 1, 1999 through July 31, 1999 (the "Fourth Interim Period"). These fees and expenses are requested in this Application and are described below.

INTRODUCTION

1. On July 7, 1997, Montgomery Ward Holding Corp., et al. (collectively the "Debtors") filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code").
2. On June 16, 1998, the Court entered an order pursuant to Section 327(e) of the Bankruptcy Code authorizing the retention and employment of Troop Meisinger Steuber & Pasich ("TMS&P") as special counsel, *nunc pro tunc* as of February 1, 1998. A copy of the order authorizing the employment of TMS&P is attached hereto as Exhibit A.
3. On August 1, 1998, TMS&P changed its name to TSPR&T. In addition, effective August 17, 1998, the address and telephone numbers of TSPR&T changed as follows:

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
2029 Century Park East, Suite 2400
Los Angeles, California 90067
Main Telephone: (310) 728-3000
Main Facsimile: (310) 728-2200

A copy of the Notice of Change of Firm Name, Address, and Telephone Numbers is attached hereto as Exhibit B.

COMPENSATION AND EXPENSES REQUESTED

4. This Application is made by TSPR&T pursuant to sections 330(a) and 331 of the Bankruptcy Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the Administrative Order, Pursuant to Sections 105 and 331 of the Bankruptcy Code, Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, dated July 8, 1997 (the "Administrative Order"), and the Notice of Effective Date of First Amended Joint Plan of Reorganization of Montgomery Ward Holding Company and its Debtor Subsidiaries, dated August 3, 1999, regarding final fee claims for professional services rendered to the Debtors. By this Application, TSPR&T seeks final approval of the professional legal services that it rendered to the Debtors in the amount of \$ 356,649.75 and for reimbursement of actual and necessary expenses that it incurred in the amount of \$ 34,725.94 during the Final Compensation Period.

5. As part of the Administrative Order, the Court authorized the submission of monthly statements of professionals and a procedure by which 80% of fees and 100% of the expenses requested in such monthly statements could be paid by the Debtors. Pursuant to the Administrative Order, TSPR&T submitted a total of 15 statements to the Debtors during the four periods of the Final Compensation Period:

FIRST INTERIM PERIOD

<u>STATEMENT PERIOD</u>	<u>FEES</u>	<u>EXPENSES</u>
February 1 -May 31, 1998	215,953.50	22,668.29
June 1 - 30, 1998	<u>24,613.50</u>	<u>1,283.43</u>
TOTAL	\$240,567.00	\$23,951.72

SECOND INTERIM PERIOD

<u>STATEMENT PERIOD</u>	<u>FEES</u>	<u>EXPENSES</u>
July 1 - 31, 1998	13,773.00	159.36
August 1 - 31, 1998	4,082.50	190.72
September 1 - 30, 1998	2,553.00	21.30
October 1 - 31, 1998	<u>7,452.50</u>	<u>2,015.97</u>
TOTAL	\$27,861.00	\$2,387.35

THIRD INTERIM PERIOD

<u>STATEMENT PERIOD</u>	<u>FEES</u>	<u>EXPENSES</u>
November 1 - 30, 1998	1,244.00	181.32
December 1 - 31, 1998	1,028.00	452.40
January 1 - 31, 1999	615.00	19.20
February 1 - 28, 1999	<u>1,239.00</u>	<u>63.90</u>
TOTAL	\$4,126.00	\$716.82

FOURTH INTERIM PERIOD

<u>STATEMENT PERIOD</u>	<u>FEES</u>	<u>EXPENSES</u>
March 1 - 31, 1999	6,355.00	582.58
April 1 - 30, 1999	22,514.00	259.96
May 1 - 31, 1999	46,378.25	2,401.74
June 1 - 30, 1999	7,810.00	3,720.27
July 1 - 31, 1999	<u>1,038.50</u>	<u>705.50</u>
TOTAL	\$84,095.75	\$7,670.05

In accordance with the Administrative Order, TSPR&T has requested that the Debtors pay 80% of the fees set forth in TSPR&T's 15 statements, and 100% of the expenses submitted in those statements.¹

SERVICES RENDERED BY TROOP STEUBER PASICH REDDICK & TOBEY, LLP
DURING THE FINAL COMPENSATION PERIOD

6. During the Final Compensation Period, TSPR&T professionals and paraprofessionals devoted a total of 1562.15 hours rendering services to the Debtors with respect to an insurance coverage lawsuit pending in California. This action seeks defense and indemnity under general liability policies for certain environmental liabilities of the Debtors of potentially significant economic impact to their estates (the "Litigation"). Summary schedules of the names of each TSPR&T professional and paraprofessional that rendered services to the Debtors in the Litigation during each of the four interim periods, the hourly rates, and the total hours charged by each such professional and paraprofessional are attached hereto as Exhibit C. Biographical data for the TSPR&T attorneys that provided services to the Debtors during the Final Compensation Period is attached hereto as Exhibit F.

7. The services rendered and expenses incurred by TSPR&T for the First through the Third Interim Periods are described in detail in the First, Second, and Third Fee Applications of TSPR&T, copies of which are attached hereto (without their exhibits) as Exhibit G and incorporated herein by reference. The services rendered and expenses incurred by TSPR&T for the Fourth Interim Period are described below.

¹ As of October 1, 1999, the Debtors had paid to TSPR&T \$286,795.25 and \$ 34,695.44 for services rendered and expenses incurred, respectively, for the Final Compensation Period.

SERVICES RENDERED BY TROOP STEUBER PASICH REDDICK & TOBEY, LLP
DURING THE FOURTH INTERIM PERIOD

8. During the Fourth Interim Period, TSPR&T professionals and paraprofessionals devoted a total of 342.95 hours rendering services to the Debtors with respect to the Litigation. These services included addressing various issues related to the appeal proceedings. TSPR&T provided services that involved (a) preparation and filing of the record on appeal; (b) researching caselaw relevant to the numerous appeal issues; (c) drafting a joint motion in coordination with opposing counsel to correct the transcript of a hearing in the trial court; (d) challenging the timeliness of a cross-appeal filed by one defendant/respondent; (e) drafting and filing of the opening brief on appeal; (f) ensuring that the opening brief and portions of the record were properly filed and remained under seal; and (g) successfully opposing an insurance trade association's application for leave to file an amicus curiae brief in the appeal.

9. For its services rendered and expenses paid during the 153-day period of the Fourth Interim Period, TSPR&T has submitted to the Debtors five statements that contain detailed information for the services provided on each litigation task, including time entries designating the particular professional rendering a service on each task, and a description of the service rendered on each task. TSPR&T has attached as Exhibit E, a copy of billing statements for the period March 1, 1999 to July 31, 1999. A general summary of the activities performed to which time was billed during the compensation period is provided below:

10. Other Case Assessment, Development and Administration During the Compensation Period, TSPR&T has spent time related to the Litigation that is not attributable to any other overall task. Time in this entry includes time attributable to the bankruptcy proceedings.

11. Appellate Motions and Submissions During the Compensation Period, TSPR&T has addressed issues relating to the timeliness of a cross-appeal filed in this action by one of the insurance carriers, engaged in legal research regarding issues raised on appeal, drafted and filed the opening brief on appeal, compiled and filed the record on appeal, coordinated with opposing counsel to prepare a joint motion to correct the transcript of a hearing in the trial court below, and successfully opposed an insurance trade association's application for leave to file an amicus curiae brief in the appeal.

12. Due to the complex nature of the Litigation, both TSPR&T and the Debtors believed that it was most efficient to have attorneys of different skill and billing levels provide support regarding different aspects of the Litigation. Furthermore, on certain occasions, TSPR&T called on professionals and para-professionals with particular areas of expertise to contribute to the Litigation. One of these individuals, Ms. Catherine Rivard, billed less than ten hours as a result of her limited participation in the Litigation. However, her services were reasonably and necessarily incurred. Specifically, Ms. Rivard is a principle in the TSPR&T insurance coverage department who is an appellate specialist with expertise in appellate procedure and briefing. Her services were utilized in order to minimize the time spent analyzing and preparing the various appellate briefs and filings referenced above.

**EXPENSES INCURRED BY TROOP STEUBER PASICH REDDICK & TOBEY, LLP
DURING THE FINAL COMPENSATION PERIOD**

13. Section 330 of the Bankruptcy Code authorizes "reimbursement for actual, necessary expenses" incurred by professionals employed in a Chapter 11 case. Accordingly, TSPR&T seeks reimbursement for expenses incurred rendering services during the Final Compensation Period in the amount of \$34,725.94. Details as to these expenses for the First through the Third Interim Periods are described in detail in the First, Second, and Third Fee

Applications of TSPR&T, copies of which are attached hereto (without their exhibits) as Exhibit G and incorporated herein by reference. Details as to these expenses for the Fourth Interim Period are in the billing statements attached hereto as Exhibit E.

14. TSPR&T's billing rates do not include charges for photocopying, word processing and other office services because the needs of each client for such services differ. TSPR&T believes that it is fairest to charge each client for the services actually used in these areas, which is TSPR&T's practice in all matters that it handles.

15. TSPR&T's photocopy charges reflect internal costs for the equipment, personnel, and supplies required to perform the work. The rate per page is uniform for all of TSPR&T's clients, and, at \$0.15 per page, is fair, reasonable and certainly no more than is customary.

16. In accordance with TSPR&T's normal practice, any travel and lodging expenses of lawyers based in TSPR&T's Los Angeles office (the only TSPR&T office) who are required to travel for work in the Litigation are reflected in this Application. TSPR&T does not seek reimbursement for first class air fare, luxury accommodations, or deluxe meals, or for personal, incidental charges, such as personal telephone calls and laundry. There are no such expenses for the Fourth Interim Period.

17. Other disbursements and expenses have been incurred in accordance with TSPR&T's normal practice of charging clients for expenses clearly related to and required by particular matters. TSPR&T has endeavored to minimize these expenses to the extent possible. In addition, TSPR&T states that it: (a) charges for computer assisted research at the provider's cost, (b) does not charge for domestic outgoing facsimile transmissions, (c) charges for actual long distance carrier charges for outgoing facsimile transmissions, and (d) does not charge for word processing.

STANDARDS

18. To grant a request for compensation pursuant to sections 330 and 331 of the Bankruptcy Code, a court must find that the request is reasonable as determined by the "lodestar" method:

It is now settled that the "lodestar" method of fee calculation developed by the Third Circuit, see Lindy Bros. Builders, Inc. v. American Radiator & Standard Sanitary Corp., 487 F.2d 161, 167 (3d Cir. 1973), is the method to be used to determine a "reasonable" attorney fee in all the federal courts. See Pennsylvania v. Delaware Valley Citizens' Council for Clean Air 483 U.S. 711 (1987).

In re Cena's Fine Furniture, Inc., 109 B.R. 575, 581 (Bankr. E.D.N.Y. 1990).

The lodestar amount is calculated by multiplying the number of hours reasonably expended by the hourly rate of the professional. Importantly, there is a "strong presumption" that the lodestar amount is reasonable under Section 330 of the Bankruptcy Code. See In re Drexel Burnham Lambert Group, Inc., 133 B.R. 13, 22 (Bankr. S.D.N.Y. 1991). TSPR&T's lodestar calculation is based on hourly rates that are within the range of hourly rates of comparable firms handling comparable complex insurance coverage litigation. Moreover, all of the time spent was reasonable and indeed necessary to protect the Debtors' interests and attempt to ultimately maximize their anticipated recovery in this action. Accordingly, TSPR&T's lodestar calculation is reasonable under sections 330 and 331 of the Bankruptcy Code.

CONCLUSION

19. The fees and expenses requested herein by TSPR&T are based on its usual and customary hourly rates and expenses charged during the Compensation Period for work performed for other clients on both insurance and non-insurance litigation matters. Neither TSPR&T, nor any principal, partner or employee thereof, has received or has been promised any compensation for services rendered or to be rendered in any other capacity in connection with these cases.

20. No agreement or understanding exists between TSPR&T or any third person for the sharing of compensation, except as allowed by section 504(b) of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 2016 with respect to sharing of compensation between and among partners of TSPR&T.

21. All services for which compensation is requested hereunder were rendered at the request of and solely on behalf of the Debtors, and not on behalf of any other entity.

22. TSPR&T respectfully requests that the Court enter an order:

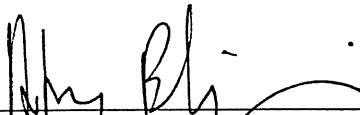
- (a) Approving on a final basis:
 - (i) interim fees of \$240,567.00 and reimbursement of expenses of \$23,951.72 for the First Interim Period;
 - (ii) interim fees of \$27,861.00 and reimbursement of expenses of \$2,387.35 for the Second Interim Period;
 - (iii) interim fees of \$4,126.00 and reimbursement of expenses of \$716.82 for the Third Interim Period; and
 - (iv) interim fees of \$86,095.75 and reimbursement of expenses of \$7,670.05 for the Fourth Interim Period.
- (b) Authorizing and instructing the Debtors to pay TSPR&T the unpaid balance of such allowed fees and expenses; and

(c) Granting such other and further relief as the Court deems just and proper.

Respectfully submitted:

Dated: October 15, 1999

TROOP STEUBER PASICH REDDICK & TOBEY, LLP



Antony E. Buchignani
Special Counsel for the Debtors

DUPLICATE
ORIGINAL

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

IN RE:	:	Chapter 11
	:	
Montgomery Ward Holding Corp.,	:	Case No. 97-1409 (PJW)
Delaware corporation, <u>et al.</u> ,	:	
	:	Jointly Administered
Debtors.	:	

**ORDER AUTHORIZING DEBTORS AND DEBTORS
IN POSSESSION TO EMPLOY AND RETAIN TROOP
MEISINGER STEUBER & PASICH, LLP AS SPECIAL COUNSEL**

This matter coming before the Court on the Application for an Order Pursuant to Section 327(e) of the Bankruptcy Code Authorizing the Retention and Employment of Troop Meisinger Steuber & Pasich, LLP as Special Counsel ("Application") filed by the above-captioned debtors and debtors in possession (collectively, the "Debtors"); the Court having reviewed the Application and the affidavit of Mary K. Barnes, a partner in the law firm of Troop Meisinger Steuber & Pasich, LLP ("TMS&P"), attached to the Application as Exhibit A (the "Affidavit"); the Court finding that the legal and factual bases set forth in the Application and the Affidavit established just cause for the relief granted herein;

THE COURT HEREBY FINDS THAT:

- A. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).
- B. The Application and the Affidavit are in compliance with all applicable provisions of the Bankruptcy Code, 11 U.S.C. §§ 101-1330 (the "Bankruptcy Code"), the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and the Local Rules of this Court. TMS&P

RLSJ-1015259-1

does not hold or represent any interest adverse to the Debtors' estates with respect to the matters for which TMS&P is to be employed.

C. The Debtors' employment of TMS&P in accordance with the Application and this Order is in the best interest of the Debtors and their respective estates.

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED.
2. The Debtors are authorized to retain and employ TMS&P as special counsel pursuant to section 327(e) of the Bankruptcy Code, *nunc pro tunc* as of February 1, 1998.
3. TMS&P is authorized to perform any and all legal services for the Debtors that are necessary or appropriate in connection with legal services described in this Application.
4. TMS&P shall be compensated for such services and reimbursed for any related expenses in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules of this Court and any future orders of this Court.

Dated: June 16, 1998



 UNITED STATES BANKRUPTCY JUDGE

LAWYERS
2029 CENTURY PARK EAST, 24TH FLOOR
LOS ANGELES, CALIFORNIA 90067
MAIN TELEPHONE (310) 728-3200
MAIN FACSIMILE (310) 728-2200

1 TROOP STEUBER PASICH REDDICK & TOBEY, LLP
MARY K. BARNES, ESQ. - State Bar No. 110196
2 JEFFREY M. JACOBBERGER, ESQ. - State Bar No. 141927
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5

6 HEDLUND HANLEY & JOHN
PETER C. JOHN, ESQ.
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Sears Tower, Suite 5700
8 Chicago, Illinois 60606
(312) 441-8600
9

10 Attorneys for Plaintiffs
MONTGOMERY WARD & CO., INCORPORATED
and MONTGOMERY WARD REALTY CORPORATION
11

12
13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 FOR THE COUNTY OF LOS ANGELES
15

16 MONTGOMERY WARD & CO.,
17 INCORPORATED, et al.,

18 Plaintiffs,

19 vs.

20 TRAVELERS INDEMNITY COMPANY, et
al.,

21 Defendants.
22

23 AND RELATED CROSS-ACTIONS
24
25
26
27
28

Case No. BC 158133

NOTICE OF CHANGE OF FIRM
NAME AND ADDRESS

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PLEASE TAKE NOTICE that effective immediately the firm of Troop Meisinger Steuber & Pasich, LLP has changed its name and address. The new name, address, telephone and facsimile numbers are as follows:

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
2029 Century Park East, Suite 2400
Los Angeles, CA 90067-3086
Telephone: (310) 728-3200
Facsimile: (310) 728-2200

DATED: August 12, 1998 TROOP STEUBER PASICH REDDICK & TOBEY, LLP

By: Mary K Barnes
Mary K Barnes
Attorneys for Plaintiffs
MONTGOMERY WARD & CO., INCORPORATED
and MONTGOMERY WARD REALTY CORPORATION

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
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TROOP STEUBER PASICH REDDICK & TOBEY, LLP

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SERVICE LIST

As of January 16, 1998

PLAINTIFFS

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Jeffrey M. Jacobberger, Esq.
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(310) 824-7000 / FAX (310) 443-7599

MONTGOMERY WARD & COMPANY,
INC. AND MONTGOMERY WARD
REALTY CORP.

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DEFENDANTS

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CENTURY INDEMNITY COMPANY, AS
SUCCESSOR TO CCI INSURANCE COMPANY,
AS SUCCESSOR TO INSURANCE COMPANY
OF NORTH AMERICA, AS SUCCESSOR TO
INDEMNITY INSURANCE COMPANY OF
NORTH AMERICA

and
IMPERIAL CASUALTY AND INDEMNITY
COMPANY

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(415) 984-8200 / FAX 415-984-8300

THE HOME INSURANCE CO.

SUMMARY OF SERVICES BY PROFESSIONAL

February 1, 1998 through June 30, 1998

NAME	POSITION	HOURLY RATE	HOURS	TOTAL DOLLARS
Jeffrey M. Jacobberger	Associate	\$ 235.00	420.70	\$ 98,864.50
Mary K. Barnes	Partner	300.00	216.00	64,800.00
Antony E. Buchignani	Associate	145.00	319.10	46,269.50
Glenn Z. Warner	Of Counsel	300.00	51.70	15,510.00
James J. Ciccone	Partner	275.00	24.00	6,600.00
Naomi A. Spina	Associate	215.00	12.20	2,623.00
Amy J. Fink	Associate	215.00	.5	107.50
Martin D. Katz	Partner	350.00	7.40	2,590.00
Julie R. Rotenberg	Paralegal	125.00	12.50	1,562.50
David W. Steuber	Partner	400.00	2.10	840.00
Griselda A. Rollins	Document Clerk	45.00	9.00	405.00
Sherrod W. Calland	Document Clerk	45.00	6.00	270.00
Catherine L. Rivard	Principal	250.00	.50	125.00
TOTAL			1,081.70	\$ 240,567.00

SUMMARY OF SERVICES BY PROFESSIONAL

July 1, 1998 through October 31, 1998

NAME	POSITION	HOURLY RATE	HOURS	TOTAL DOLLARS
Mary K. Barnes	Partner	\$300.00	48.20	\$14,460.00
Jeffrey M. Jacobberger	Principal	235.00	36.00	8,460.00
Antony E. Buchignani	Associate	145.00	33.30	4,828.50
Julie R. Rotenberg	Paralegal	125.00	.90	112.50
TOTAL			118.40	\$27,861.00

SUMMARY OF SERVICES BY PROFESSIONALS

November 1, 1998 through February 28, 1999

NAME	POSITION	HOURLY RATE	HOURS	TOTAL DOLLARS
Mary K. Barnes	Partner	\$300.00 (11/1/98-12/31/98)	3.20 (11/1/98-12/31/98)	\$960.00 (11/1/98-12/31/98)
		\$330.00 (1/1/99-2/28/99)	2.30 1/1/99-2/28/99)	\$759.00 1/1/99-2/28/99)
Jeffrey M. Jacobberger	Principal	\$235.00 (11/1/98-12/31/98)	1.50 (11/1/98-12/31/98)	\$352.50 (11/1/98-12/31/98)
		\$265.00 1/1/99-2/28/99)	.60 1/1/99-2/28/99)	\$159.00 1/1/99-2/28/99)
Antony E. Buchignani	Associate	\$145.00 (11/1/98-12/31/98)	6.10 (11/1/98-12/31/98)	\$884.50 (11/1/98-12/31/98)
		\$195.00 1/1/99-2/28/99)	4.80 1/1/99-2/28/99)	\$936.00 1/1/99-2/28/99)
Julie R. Rotenberg	Paralegal	\$125.00 (11/1/98-2/28/99)	.60 (11/1/98-2/28/99)	75.00
TOTAL			19.10	\$4,126.00

SUMMARY OF SERVICES BY PROFESSIONALS

March 1, 1999 through July 31, 1999

NAME	POSITION	HOURLY RATE	HOURS	TOTAL DOLLARS
Mary K. Barnes	Partner	\$330.00	29.80	\$9,834.00
Catherine L. Rivard	Principal	\$275.00	6.9	\$1,897.50
Jeffrey M. Jacobberger	Principal	\$265.00	232.40	\$61,586.00
Antony E. Buchignani	Associate	\$195.00	22.10	\$4,309.50
Mary E. Cummings	Paralegal	\$125.00	51.75	\$6,468.75
TOTAL			342.95	\$84,095.75

Uniform Task-Based Management System
Litigation Code Set

LITIGATION CODE SET

L100 Case Assessment, Development and Administration

- L110 Fact Investigation/Development
- L120 Analysis/Strategy
- L130 Experts/Consultants
- L140 Document/File Management
- L150 Budgeting
- L160 Settlement/Non-Binding ADR
- L190 Other Case Assessment, Development and Administration

L200 Pre-Trial Pleadings and Motions

- L210 Pleadings
- L220 Preliminary Injunctions/Provisional Remedies
- L230 Court Mandated Conferences
- L240 Dispositive Motions
- L250 Other Written Motions and Submissions
- L260 Class Action Certification and Notice

L300 Discovery

- L310 Written Discovery
- L320 Document Production
- L330 Depositions
- L340 Expert Discovery
- L350 Discovery Motions
- L390 Other Discovery

L400 Trial Preparation and Trial

- L410 Fact Witnesses
- L420 Expert Witnesses
- L430 Written Motions and Submissions
- L440 Other Trial Preparation and Support
- L450 Trial and Hearing Attendance
- L460 Post-Trial Motions and Submissions
- L470 Enforcement

L500 Appeal

- L510 Appellate Motions and Submissions
- L520 Appellate Briefs
- L530 Oral Argument

May 2, 1995

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
Montgomery Realty Co.
Attn: Phil Delk, Esq.
535 Chicago Avenue
Suite 24N
Chicago, IL 60610

Date: 04/28/99
File: 013305-0001
Invoice: 132819

FED. NO. 95-3551349

RE: INS. LITIGATION

Balance Due from Previous Statement:	65,251.87
Less Payments Received:	1,566.30
Balance Forward:	63,685.57
For Legal Services Rendered During The Period Through March 31, 1999	
Total Professional Services:	6,355.00
Total Disbursements:	582.58
Total Current Charges:	6,937.58
Total Balance Due For Matter 013305-0001	70,623.15

Total Fees Billed from inception to date:	367,985.50
Total Costs Billed from inception to date:	46,850.18

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 132819

Apr 28, 1999

PAGE 2

FED. NO. 95-3551349

RE: INS. LITIGATION

MATTER NUMBER: 013305-0001
BILLING ATTORNEY: Mary K. Barnes

DATE	DESCRIPTION OF SERVICES RENDERED	HOURS	FEES
----	-----	-----	-----
03/01/99	Telephone conference with T. Bayliss regarding status of search for Montgomery Ward Court file (L510). Principal: JMJ	.10	26.50
03/02/99	Telephone conferences with Don Hall and Michael Rachly regarding bad faith expert materials (.6); office conference regarding motion to dismiss (.2) (L190). Partner: MKB	.80	264.00
03/03/99	Telephone conference with Don Hall regarding documents and messenger pick-up (L190). Partner: MKB	.20	66.00
03/04/99	Conference with Mary Barnes regarding proof of claim back-up (L190). Associate: AEB	.30	58.50

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
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TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 132819

Apr 28, 1999

PAGE 3

FED. NO. 95-3551349

03/05/99	Telephone conference with Kay Pich regarding Imperial cross-appeal (.2); telephone conference with C. Manfredi regarding form motion to dismiss (.1); research regarding motion to dismiss Imperial's cross-appeal (.3) (L510). Principal: JMJ	1.30	344.50
03/09/99	Letter to P. Delk regarding February 27, 1998, Proof of Claim (L190). Associate: AEB	.30	58.50
03/10/99	Telephone conference with Kay Pich regarding appeal timing issues and motion to dismiss Imperial's cross-appeal (.1); conference with C. Kehlenbeck regarding filing of transcripts and service of notice of judgment (.1) (L510). Principal: JMJ	.20	53.00
03/11/99	Research regarding motion to dismiss Imperial cross-appeal and draft motion (L510). Principal: JMJ	1.10	291.50
03/12/99	Review and analysis of fee auditor report (.2); conference with Mary K. Barnes regarding same (.2) (L190). Associate: AEB	.40	78.00
03/15/99	Office conference regarding motion to dismiss and call to K. Pasich regarding same (L510). Partner: MKB	1.20	396.00
03/15/99	Review court file regarding service of judgment and minute order (1.3); draft motion to dismiss cross-appeal (4.2); conference with M. Barnes regarding same (.1) (L510). Principal: JMJ	5.60	1484.00

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 132819

Apr 28, 1999

PAGE 4

FED. NO. 95-3551349

03/16/99	Review motion to dismiss and office conference regarding same (L510). Partner: MKB	1.00	330.00
03/18/99	Revise motion to dismiss Imperial's cross-complaint (L510). Principal: JMJ	.60	159.00
03/19/99	Revise motion to dismiss Imperial's cross-complaint (L510). Principal: JMJ	.70	185.50
03/22/99	Office conference regarding status of motion to dismiss (L510). Partner: MKB	.20	66.00
03/22/99	Draft proposed order regarding motion to dismiss Imperial's cross-complaint (L510). Principal: JMJ	.30	79.50
03/23/99	Review information regarding opening brief, etc (L520). Partner: MKB	.30	99.00
03/25/99	Review trial court briefing regarding appeal brief (L520). Partner: MKB	.80	264.00
03/26/99	Conference call regarding opening brief, etc (L520). Partner: MKB	.80	264.00
03/26/99	Telephone conference with K. Pick & M. Rachlis regarding new California Pacific Homes' decision for differences from original opinion (L520). Principal: JMJ	.20	53.00

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
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TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 132819

Apr 28, 1999

PAGE 5

FED. NO. 95-3551349

03/26/99	Review trial briefs regarding appellate issues (.5); conference call with M. Barnes, K. Pick and M. Rachlis regarding appellate issues (1.5); research regarding amicus briefs, filing, appellate record under seal (1.1); telephone conference with T. Childress regarding California Pacific Homes' decision (.1); review new California Pacific Homes' decision for differences from original opinion (.6); draft e-mail to K. Pick and M. Barnes regarding miscellaneous procedural issues (.4); review pleading index regarding appellate record (.3) (L520). Principal: JMJ	4.50	1192.50
03/29/99	Review pleading index regarding designation of documents for appellate record (L520). Principal: JMJ	.80	212.00
03/30/99	Office conference regarding briefing schedule issues, etc. and research regarding amicus briefs (L520). Partner: MKB	1.00	330.00

Total Professional Services: 6,355.00

-----TIME AND FEE SUMMARY-----			
-----TIMEKEEPER-----	RATE	HOURS	FEEES
Mary K. Barnes	330.00	6.30	2079.00
Jeffrey M. Jacobberger	265.00	15.40	4081.00
Antony E. Buchignani	195.00	1.00	195.00
TOTALS		22.70	6355.00

DESCRIPTION

AMOUNT

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 132819

Apr 28, 1999

PAGE 6

FED. NO. 95-3551349

Attorney Service	67.63
Photocopying	306.45
Messenger	163.05
Telephone	45.45

Total Disbursements: 582.58

Balance From Previous Statement: 65,251.87
Less Payments Received: 1,566.30
Balance Forward: 63,685.57

Total Professional Services: 6,355.00
Total Disbursements: 582.58

Total Current Charges: 6,937.58

Total Balance Due For This Matter: 70,623.15

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
Montgomery Realty Co.
Attn: Phil Delk, Esq.
535 Chicago Avenue
Suite 24N
Chicago, IL 60610

Date: 06/05/99
File: 013305-0001
Invoice: 134589

FED. NO. 95-3551349

RE: INS. LITIGATION

Balance Due from Previous Statement:	70,623.15
Less Payments Received:	5,666.58
Balance Forward:	64,956.57
For Legal Services Rendered During The Period Through April 30, 1999	
Total Professional Services:	22,514.00
Total Disbursements:	259.96
Total Current Charges:	22,773.96
Total Balance Due For Matter 013305-0001	87,730.53

Total Fees Billed from inception to date:	374,340.50
Total Costs Billed from inception to date:	47,432.76

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 134589

Jun 5, 1999

PAGE 2

FED. NO. 95-3551349

RE: INS. LITIGATION

MATTER NUMBER: 013305-0001
BILLING ATTORNEY: Mary K. Barnes

<u>DATE</u>	<u>DESCRIPTION OF SERVICES RENDERED</u>	<u>HOURS</u>	<u>FEES</u>
04/01/99	(L520) Calls regarding possible amicus brief (.5); research reissued Pacific Homes case (.3). Partner: MKB	.80	264.00
04/06/99	(L510) Review Imperial's opposition to Montgomery Ward's motion to dismiss cross-complaint (.2); conference with A. Buchignani regarding same (.1). Principal: JMJ	.30	79.50
04/06/99	(L510) Legal research regarding motion to dismiss cross-appeal (.2); conference with Jeffrey M. Jacobberger regarding same (.2). Associate: AEB	.40	78.00
04/06/99	(L190) Research regarding local bankruptcy rules regarding fee application (.2). Associate: AEB	.20	39.00

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
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TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 134589

Jun 5, 1999

PAGE 3

FED. NO. 95-3551349

04/07/99	(L190) Review and revise payment request and justification regarding bankruptcy proceeding and conference with A. Buchignani regarding same. Principal: JMJ	.20	53.00
04/07/99	(L510) Conference with Kay Pick regarding Imperial's opposition to motion to dismiss. Principal: JMJ	.20	53.00
04/07/99	(L190) Draft 3rd fee application (1.5); (L190) conference with Mary K. Barnes regarding same (.2); (L190) conference with Jeffrey M. Jacobberger regarding same (.2). Associate: AEB	1.90	370.50
04/08/99	Draft and revise 3rd fee application (1.6)(L190); conference with Jeffrey M. Jacobberger regarding same (.3). Associate: AEB	1.90	370.50
04/09/99	(L190) Review and revise fee application. Partner: MKB	.20	66.00
04/09/99	Prepare response to fee auditor report (L190)(.3); telephone conference with fee auditor (W. Meyer) regarding format of response and extension to respond (.2)(L190); letter to W. Meyer confirming conversation (.3)(L190); review and analysis of court order appointing fee auditor regarding same (L190)(.2); review and revise third fee application (L190)(1.0). Associate: AEB	1.80	351.00
04/12/99	(L510) Legal research regarding Imperial's opposition to motion to dismiss cross-appeal. Principal: JMJ	1.10	291.50

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

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TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 134589

Jun 5, 1999

PAGE 4

FED. NO. 95-3551349

04/12/99 (L510) Research and review cases cited by Imperial in opposition to motion. Principal: JMJ	.70	185.50
04/12/99 (L190) Telephone conference with fee auditor regarding audit report and response thereto. Associate: AEB	.20	39.00
04/13/99 (L510) Telephone conference with Kay Pick regarding Imperial's opposition to motion to dismiss. Principal: JMJ	.30	79.50
04/13/99 (L520) Telephone conference with Second District Court of Appeal Clerk regarding filing procedure and record. Principal: JMJ	.10	26.50
04/13/99 Telephone conference with K. Pick regarding motion to dismiss Imperial's cross-appeal (L510). Associate: AEB	.20	39.00
04/15/99 (L520) Conference with Jeffrey M. Jacobberger re issues for appeal. Principal: CLR	.80	220.00
04/15/99 (L520) Review insurance policies regarding defense obligations, underlying insurance and other insurance clauses. Principal: JMJ	2.70	715.50
04/15/99 (L520) Conference with C.L. Rivard regarding issues regarding Forum Insurance Company and transfer to risk. Principal: JMJ	.70	185.50

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

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Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 134589

Jun 5, 1999

PAGE 5

FED. NO. 95-3551349

04/15/99 (L510) Telephone conference with K. Pick regarding order to re: motion to dismiss Imperial's cross appeal. Principal: JMJ	.10	26.50
04/15/99 (L520) Draft opening brief. Principal: JMJ	2.40	636.00
04/16/99 (L520) Research appeal issues. Partner: MKB	.80	264.00
04/16/99 (L520) Review Forum policies regarding defense obligations (1.1). Principal: JMJ	1.80	477.00
04/19/99 (L520) Research regarding horizontal exhaustion/duty to defend/exclusions (L520) (3.2). Principal: JMJ	3.20	848.00
04/19/99 Draft opening brief (L520) (3.7). Principal: JMJ	3.70	980.50
04/20/99 (L520) Telephone conference with Joe Snyder regarding amicus. Partner: MKB	.20	66.00
04/20/99 (L520) Fax letter to S. Thorpe and J. Forbes regarding opening brief (.1). Principal: JMJ	.10	26.50
04/20/99 (L520) Review fax from S. Thorpe and J. Forbes regarding opening brief. Principal: JMJ	.20	53.00
04/20/99 (L520) Telephone conference with Kay Pick regarding opening brief. Principal: JMJ	.10	26.50

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 134589

Jun 5, 1999

PAGE 6

FED. NO. 95-3551349

04/20/99 (L520) Telephone conference to Court of Appeal regarding 7/13/98 transcript. Principal: JMJ	.10	26.50
04/20/99 (L520) Review papers regarding motion for summary adjudication in case presenting horizontal issue. Principal: JMJ	1.10	291.50
04/21/99 (L520) Research regarding Alcan case (.4). Principal: JMJ	.40	106.00
04/21/99 (L520) Review pleading from other cases regarding horizontal exhaustion ruling. Principal: JMJ	1.80	477.00
04/21/99 (L520) Review transcript of exhaustion issues. Principal: JMJ	1.30	344.50
04/21/99 (L520) Review transcript of 7/13/98 hearing. Principal: JMJ	.80	212.00
04/21/99 (L520) Telephone conference with K. Pick regarding 7/13/98 transcript. Principal: JMJ	.30	79.50
04/22/99 (L190) Review auditor's findings in initial report dated 3/11/99. Partner: MKB	1.00	330.00
04/22/99 (L520) Draft opening brief. Principal: JMJ	11.70	3100.50
04/22/99 (L190) Telephone conference with fee auditor (B. Meyers) regarding meeting to discuss first fee application (L190) . Associate: AEB	.20	39.00

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 134589

Jun 5, 1999

PAGE 7

FED. NO. 95-3551349

04/23/99 (L190) Telephone conference with Bill Meyers, Esq. regarding initial report and response thereto (.4); outline response to initial report of fee auditor (.4). Partner: MKB	.80	264.00
04/23/99 (L520) Conference with Jeffrey M. Jacobberger re appellate issues. Principal: CLR	.80	220.00
04/23/99 (L520) Draft opening brief. Principal: JMJ	7.70	2040.50
04/23/99 (L520) Exchange voice mail with S. Thorpe regarding 7/13/98 transcript. Principal: JMJ	.10	26.50
04/23/99 (L190) Telephone conference with fee auditor (B. Meyers) regarding response to first fee application report (.3); conference with Mary K. Barnes regarding same (.2). Associate: AEB	.50	97.50
04/26/99 (L520) Legal research regarding horizontal exhaustion; draft opening brief. Principal: JMJ	8.10	2146.50
04/26/99 Telephone conference with fee auditor (B. Meyers) regarding response to audit report (L190)(.2); conference with M. Harper (TSPR&T) regarding bankruptcy reimbursement procedure (L190)(.2). Associate: AEB	.40	78.00
04/27/99 (L520) Draft opening brief. Principal: JMJ	7.40	1961.00

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

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TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 134589

Jun 5, 1999

PAGE 8

FED. NO. 95-3551349

04/28/99 (L520) Review cases regarding horizontal exhaustion. Principal: JMJ	1.40	371.00
04/29/99 (L520) Review transcripts of hearing of 7/13/98. Principal: JMJ	1.30	344.50
04/29/99 (L520) Draft opening brief (2.1); conference with K. Pasich and M. Rachlis regarding appeal appendix (2.7). Principal: JMJ	4.80	1272.00
04/30/99 (L520) Draft opening brief. Principal: JMJ	6.70	1775.50

Total Professional Services: 22,514.00

-----TIME AND FEE SUMMARY-----			
-----TIMEKEEPER-----	RATE	HOURS	FEE
Mary K. Barnes	330.00	3.80	1254.00
Catherine L. Rivard	275.00	1.60	440.00
Jeffrey M. Jacobberger	265.00	72.90	19318.50
Antony E. Buchignani	195.00	7.70	1501.50
TOTALS		86.00	22514.00

DESCRIPTION	AMOUNT
-----	-----
Photocopying	49.35
Telephone	4.31
Federal Express	37.50
Telephone	168.80




Invoice No: 7-559-14217
Invoice Date: Apr 17, 1999
Account Number: 1762-2913-6
Page 60 of 70

Payment Type Detail

Picked up: Apr 09, 1999 Payor: Shipper Reference: 13305-1

- Distance Based Pricing, Region 8
- FedEx has audited this airbill for correct pieces, weight, and service. Any changes made are reflected in the invoice amount.

<u>Airbill</u>	809470792555	<u>Sender</u>	<u>Recipient</u>	
<u>Service Type</u>	FedEx Priority Overnight	AEB	CAROL MILLER	
<u>Package Type</u>	FedEx Pak	TROOP STEUBER PASICH REDDICK	RICHARDS LAYTON & FINGER	
<u>Region</u>	8	2029 CENTURY PARK E STE 2400	ONE RODNEY SQUARE	
<u>Pieces</u>	1	LOS ANGELES CA 90067-3010 US	WILMINGTON DE 19899 US	
<u>Weight</u>	2.0 lbs			
<u>Delivered</u>	Apr 10, 1999 10:20	<u>Transportation Charge</u>		15.00
<u>Service</u>		<u>Saturday Delivery</u>		10.00
<u>Area Code</u>	AA			
<u>Signed by</u>	Z.NAWOZ	Total Transportation Charges	USD \$	25.00

FedEx Internal Use: 010323169/03993/_/_

Picked up: Apr 09, 1999 Payor: Shipper Reference: 13325 12

- Original address - 201 SPEAR ST 9TH FL/SAN FRANCISCO,CA 95105
- Distance Based Pricing, Region 4
- FedEx has audited this airbill for correct pieces, weight, and service. Any changes made are reflected in the invoice amount.

<u>Airbill</u>	809531248609	<u>Sender</u>	<u>Recipient</u>	
<u>Service Type</u>	FedEx Express Saver	JEFFREY M JACOBBERGER	DEBORAH A CHING ESQ	
<u>Package Type</u>	FedEx Pak	TROOP STEUBER PASICH REDDICK	MCI WORLDCOM	
<u>Region</u>	4	2029 CENTURY PARK E STE 2400	201 SPEAR ST 9TH FL	
<u>Pieces</u>	1	LOS ANGELES CA 90067-3010 US	SAN FRANCISCO CA 94105 US	
<u>Weight</u>	3.0 lbs			
<u>Delivered</u>	Apr 13, 1999 09:21	<u>Transportation Charge</u>		8.15
<u>Service</u>		<u>Address Correction</u>		10.00
<u>Area Code</u>	A1			
<u>Signed by</u>	L.REDDIC	Total Transportation Charges	USD \$	18.15

FedEx Internal Use: 010323169/10600/_/_

Dropped off: Apr 09, 1999 Payor: Shipper Reference: 13325-41

- Distance Based Pricing, Region 2

<u>Airbill</u>	808755533471	<u>Sender</u>	<u>Recipient</u>	
<u>Service Type</u>	FedEx Priority Overnight	SEAN A MARKS ESQ	STEVEN M ROMANOFF ESQ	
<u>Package Type</u>	FedEx Letter	TROOP STEUBER PASICH REDDICK	7817 HERSCHEL AVE STE 200	
<u>Region</u>	2	2029 CENTURY PARK E STE 2400	LA JOLLA CA 92037 US	
<u>Pieces</u>	1	LOS ANGELES CA 90067-3010 US		
<u>Weight</u>	0			
<u>Delivered</u>	Apr 12, 1999 09:22	<u>Transportation Charge</u>		9.50
<u>Service</u>				
<u>Area Code</u>	A1	Total Transportation Charges	USD \$	9.50
<u>Signed by</u>	C.BUBICK			

FedEx Internal Use: 010323272/00626/_/_



Invoice No: 7-558-92541
Invoice Date: Apr 10, 1999
Account Number: 1762-2913-6
 Page 30 of 55

Payment Type Detail

Dropped off: Mar 31, 1999 **Payor: Shipper** **Reference: 13305-1**

- Distance Based Pricing, Region 7

Airbill 807940300654
Service Type FedEx Standard Overnight
Package Type FedEx Pak
Region 7
Pieces 1
Weight 1.0 lbs
Delivered Apr 01, 1999 14:01
Service
Area Code A1
Signed by G.HILL

Sender
 JEFFREY M JACOBBERGER
 TROOP STEUBER PASICH REDDICK
 2029 CENTURY PARK E STE 2400
 LOS ANGELES CA 90067-3010 US

Recipient
 KAY L P ESQ
 ERDLUND HASLEY & JOHN
 233 S WACKER DR STE 5700
 CHICAGO IL 60606 US

Transportation Charge 12.50
Total Transportation Charges USD \$ 12.50

FedEx Internal Use: 009212661/02609/_/_

Picked up: Mar 31, 1999 **Payor: Shipper** **Reference: 13325-67**

- Distance Based Pricing, Region 4

Airbill 808849679532
Service Type FedEx Priority Overnight
Package Type FedEx Letter
Region 4
Pieces 1
Weight 0
Delivered Apr 01, 1999 10:13
Service
Area Code AA
Signed by C.MORALES

Sender
 JEFFREY W DULBERG ESQ
 TROOP STEUBER PASICH REDDICK
 2029 CENTURY PARK E STE 2400
 LOS ANGELES CA 90067-3010 US

Recipient
 GARY GREULE ESQ
 LAW OFFICES OF GARY GRAULE
 7777 GREENBACK LANE STE 107
 CITRUS HEIGHTS CA 95610 US

Transportation Charge 9.50
Total Transportation Charges USD \$ 9.50

FedEx Internal Use: 009222899/00626/_/_

Dropped off: Mar 31, 1999 **Payor: Shipper** **Reference: 13374-2**

- Distance Based Pricing, Region 8

Airbill 809531247852
Service Type FedEx Priority Overnight
Package Type FedEx Letter
Region 8
Pieces 1
Weight 0
Delivered Apr 01, 1999 09:33
Service
Area Code A1
Signed by M.KLEINHENS

Sender
 DOUGLAS G CROWELL
 TROOP STEUBER PASICH REDDICK
 2029 CENTURY PARK E STE 2400
 LOS ANGELES CA 90067-3010 US

Recipient
 JEAN AND TONI GOUTAL
 765 PARK AVE STE 12B
 NEW YORK NY 10021 US

Transportation Charge 9.50
Total Transportation Charges USD \$ 9.50

FedEx Internal Use: 009212661/00626/_/_

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
Montgomery Realty Co.
Attn: Phil Delk, Esq.
535 Chicago Avenue
Suite 24N
Chicago, IL 60610

Date: 06/21/99
File: 013305-0001
Invoice: 135318

FED. NO. 95-3551349

RE: INS. LITIGATION

Balance Due from Previous Statement:	87,730.53
Less Payments Received:	.00
Balance Forward:	87,730.53
For Legal Services Rendered During The Period Through May 31, 1999	
Total Professional Services:	46,378.25
Total Disbursements:	2,401.74
Total Current Charges:	48,779.99
Total Balance Due For Matter 013305-0001	136,510.52
Total Fees Billed from inception to date:	396,854.50
Total Costs Billed from inception to date:	47,692.72

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 135318

Jun 21, 1999 PAGE 2

FED. NO. 95-3551349

RE: INS. LITIGATION

MATTER NUMBER: 013305-0001
BILLING ATTORNEY: Mary K. Barnes

DATE	DESCRIPTION OF SERVICES RENDERED	HOURS	FEES
05/03/99	(L520) Research on horizontal exhaustion issue and regarding procedural issues regarding summary adjudication motions (4.0); draft opening brief (3.7). Principal: JMJ	7.70	2040.50
05/03/99	(L530) Revise pleading index for appeal (3.50). Paralegal: MEC	3.50	437.50
05/04/99	(L520) Draft opening brief (2.7); review record to locate and compile site-specific facts (4.4). Principal: JMJ	7.10	1881.50
05/04/99	(L190) Review and analysis of Troop Steuber Pasich Reddick & Tobey, LLP bills for privileged information. Associate: AEB	.30	58.50

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

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Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 135318

Jun 21, 1999

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05/05/99	(L520) Draft opening brief (5.9); conference with Mary Cummings regarding appellant's appendix (.3). Principal: JMJ	6.20	1643.00
05/05/99	Draft response to fee auditor report (.8) (L190). Associate: AEB	.80	156.00
05/05/99	(L520) Prepare pleadings for copying for appeal (4.00). Paralegal: MEC	4.00	500.00
05/06/99	(L520) Conference with J. Jacobberger re appellate issues regarding briefing and procedure. Principal: CLR	1.00	275.00
05/06/99	(L520) Review pleadings to identify documents for inclusion in appellant's appendix. Principal: JMJ	3.70	980.50
05/06/99	(L190) Draft response to fee auditor's report regarding first fee application. Associate: AEB	2.80	546.00
05/06/99	(L520) Review copies of pleadings for appeal (3.50); meet with copy center re same and questions (.50). Paralegal: MEC	4.00	500.00
05/07/99	(L520) Review out-of-state cases regarding allocation/horizontal exhaustion. Principal: JMJ	1.10	291.50
05/07/99	(L190) Conference with Mary K. Barnes regarding response to fee auditor report. Associate: AEB	.20	39.00

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
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TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 135318

Jun 21, 1999

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FED. NO. 95-3551349

05/10/99	(L520) Review record regarding statement of facts (3.1); research regarding allocation of settlement (2.7); draft opening brief (1.4). Principal: JMJ	7.20	1908.00
05/11/99	(L520) Review pleadings regarding denial of motion for summary adjudication regarding affirmative defenses (2.1); research regarding legal standard regarding denial of summary adjudication motion (1.7); draft opening brief (4.4). Principal: JMJ	8.20	2173.00
05/11/99	(L520) Finish review of copied pleadings for correct order (4.00); revise appeal draft pleadings appendix (2.00); pull copy of pleadings for Kay Pick (Hedlund firm) and send via Fedex (1.50). Paralegal: MEC	7.50	937.50
05/12/99	(L520) Revise introduction and statement of facts (2.2); revise argument regarding Home self-insured retention; revise argument regarding Imperial's duty to defend (3.9); draft argument regarding denial of motions for summary adjudication regarding affirmative defenses (2.4). Principal: JMJ	8.50	2252.50
05/13/99	(L520) Conference with J. Jacobberger re appellate issues regarding Howe self insured retention. Principal: CLR	.30	82.50
05/13/99	(L520) Draft opening brief regarding allocation of settlement. Principal: JMJ	7.80	2067.00

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

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Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 135318

Jun 21, 1999

PAGE 5

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05/13/99 (L520) Revise Appeal Pleading Appendix to Court format (1.20); locate transcripts on "Designation of Record on Appeal" for Jeff Jacobberger and have copied (.60); create caption pages for Appendix Volumes "I of " - "XX of " (.40); arrange for Express Network to pull conformed face pages for defendants pleadings (.50). Paralegal: MEC	2.70	337.50
05/14/99 (L190) Prepare revisions to billings and response to fee auditor's report. Partner: MKB	5.00	1650.00
05/14/99 (L520) Prepare appellant's opening brief. Partner: MKB	.50	165.00
05/14/99 (L520) Draft opening brief; revise sections regarding Home self-insured retention and Imperial defense duty (6.3); miscellaneous conferences with M. Cummings regarding Appellants' appendix (.7); miscellaneous telephone conferences with K. Pick regarding brief (.4). Principal: JMJ	7.40	1961.00
05/14/99 (L190) Conference with Mary K. Barnes regarding response to fee auditor report (.3)(L190); draft response to fee auditor report (3.4). Associate: AEB	3.70	721.50
05/14/99 (L520) Pull additional pleadings (per Jeff Jacobberger) for Appeal Appendix and update Index of same (2.50). Paralegal: MEC	2.50	312.50

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
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Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 135318

Jun 21, 1999

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FED. NO. 95-3551349

05/16/99 (L520) Revise and rewrite opening brief; draft argument regarding allocation issues. Principal: JMJ	10.10	2676.50
05/17/99 (L190) Prepare response to fee auditor's initial report in response to our fee application (1.5). Partner: MKB	1.50	495.00
05/17/99 (L520) Office conference regarding appellant's opening brief and prepare same. Partner: MKB	1.00	330.00
05/17/99 (L520) Conferences with J. Jacobberger re appellate issues regarding allocation arguments. Principal: CLR	1.40	385.00
05/17/99 (L520) Draft argument regarding denial of motions for summary adjudication regarding affirmative defenses (1.1); revise portion of brief regarding denial of motion to amend complaint regarding bad faith (2.2); conference with C. Rivard regarding allocation arguments (1.4); revise brief (.4). Principal: JMJ	5.10	1351.50
05/17/99 (L190) Review and revise response to fee auditor report (1.3); conference with Mary K. Barnes regarding same (.2)(L190); telephone conference with fee auditor regarding first and third fee applications (.2)(L190); letter to fee auditor regarding same (.3)(L190); review and analysis of bankruptcy local order #32 (.3)(L190). Associate: AEB	2.30	448.50

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
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Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 135318

Jun 21, 1999

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05/17/99 (L520) Meet with Jeff Jacobberger re additional pleadings to add to Appeal Appendix and re his revisions to Index of same (.55); calls with Express Network re additional pleadings conformed face pages needed from court and status of same (.70). Paralegal: MEC	1.25	156.25
05/18/99 (L520) Review appellant's Opening Brief. Principal: CLR	1.60	440.00
05/18/99 (L520) Telephone conference with K. Pick regarding revisions to opening brief (.3); telephone conference with K. Pick and M. Rachlis regarding changes to opening brief (.3); conference with M. Cummings regarding appellant's appendix and citations to record for opening brief (1.6); revise opening brief (7.2). Principal: JMJ	9.40	2491.00
05/18/99 (L520) Pull additional pleadings for Appeal Appendix and revise Index of same (3.40); meet with Jeff Jacobberger to add quotes to brief (1.50); organize Appeal Appendix documents and add conformed pages (2.40). Paralegal: MEC	7.30	912.50
05/19/99 (L520) Prepare opening brief. Partner: MKB	2.00	660.00
05/19/99 (L520) Review appellant's opening brief; conference with J. Jacobberger re same. Principal: CLR	.30	82.50
05/19/99 (L520) Revise opening brief. Principal: JMJ	9.80	2597.00

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
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2029 CENTURY PARK EAST
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Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 135318

Jun 21, 1999

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FED. NO. 95-3551349

05/19/99 (L520) Revise Chron Index of Appendix in Lieu of Clerk's Transcript re additional documents, corrected dates, etc. (2.10); pull additional documents for Appendix (1.90); add conformed face pages to Appendix documents and pull documents from Appendix per Jeff Jacobberger request (2.25). Paralegal: MEC	6.25	781.25
05/20/99 (L520) Review and revise appellants' opening brief. Partner: MKB	3.00	990.00
05/20/99 (L510) Conference with J. Jacobberger re filing brief under seal. Principal: CLR	.20	55.00
05/20/99 (L510) Draft motion to have brief and volume 24 of appendix placed under seal. Principal: JMJ	1.90	503.50
05/20/99 (L520) Revise appellant's opening brief (3.7); conference with M. Barnes regarding modifications to brief (.3); miscellaneous conferences with M. Cummings regarding appellant's appendix (.4); conference with K. Pick regarding changes to brief (.5); review appendix for citations to record for opening brief (7.8); compile and proofread appellant's appendix (2.1); telephone conference with Sara Thorpe regarding appendix (.1); telephone conference with Tammy Albertsen-Murray regarding appendix (.1). Principal: JMJ	15.00	3975.00
05/20/99 (L520) Finalize Appendix in Lieu of Clerk's Transcript for 5/21/99 Appeal (10.75). Paralegal: MEC	10.75	1343.75

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 135318

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FED. NO. 95-3551349

05/21/99 (L510) Finalize application for placing opening brief and volume 24 of appendix under seal. Principal: JMJ	.90	238.50
05/21/99 (L520) Proofread and finalize opening brief (4.7); review proof of service (.2). Principal: JMJ	4.90	1298.50
05/21/99 (L520) Assist Jeff Jacobberger with appeal filing final details (2.00). Paralegal: MEC	2.00	250.00
Total Professional Services:		46,378.25

-----TIME AND FEE SUMMARY-----			
-----TIMEKEEPER-----	RATE	HOURS	FEES
Mary K. Barnes	330.00	13.00	4290.00
Catherine L. Rivard	275.00	4.80	1320.00
Jeffrey M. Jacobberger	265.00	122.00	32330.00
Antony E. Buchignani	195.00	10.10	1969.50
Mary E. Cummings	125.00	51.75	6468.75
TOTALS		201.65	46378.25

DESCRIPTION	AMOUNT
-----	-----
Photocopying	2210.85
Messenger	92.39
Telephone	98.50

Total Disbursements: 2,401.74

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward & Co., Inc.
FILE NUMBER: 013305-0001
INVOICE NO.: 135318

Jun 21, 1999

PAGE 10

FED. NO. 95-3551349

Balance From Previous Statement:	87,730.53
Less Payments Received:	.00
Balance Forward:	87,730.53
Total Professional Services:	46,378.25
Total Disbursements:	2,401.74
Total Current Charges:	48,779.99
Total Balance Due For This Matter:	136,510.52

INVOICE

INVOICE NUMBER 73112	CUSTOMER NUMBER 3008
INVOICE DATE 5/15/99	TOTAL AMOUNT DUE 870.21
CURRENT 210.56	OVER 30 DAYS .00
OVER 60 DAYS .00	OVER 90 DAYS 659.65

A Fidelity National Financial Company

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ATT: ELIZABETH NGUYEN
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LOS ANGELES, CA 90067-3010

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MAY 07 1999

EXPRESS NETWORK, INC
FIDELITY NATIONAL FINANCE
DEPT. 0768
LOS ANGELES, CA 90088-0768

PLEASE DETACH HERE AND RETURN WITH REMITTANCE

EXPRESS NETWORK, INC		CUSTOMER NO.	INVOICE NO.	INVOICE FOR PERIOD ENDING	AMOUNT DUE	PAGE	FIDELITY NATIONAL FINANCE	
		3008	73112	5/15/99	870.21	1		
DATE	JOB NO.	SVC TYPE	SERVICE DETAIL				CHARGE BREAKDOWN	TOTAL
5/06/99	1640370	XRS	LOS ANGELES SUPERIOR COURT 1725 MAIN STREET SANTA MONICA CA 90401-3299 Caller: MARY C. 7283608 Time: 11:39 Signed: OBTAINED DOCKET Time: 16:00	TROOP STEUBER PASICH REDDICK LLP 2029 CENTURY PARK EAST LOS ANGELES CA 90067-3010	Base Chg : Adv Fees : Crt/Rsch :	50.00 2.57 12.00	64.57	
			Your Ref.: 20216-9999					
			Total Charges for Ref. - 20216-9999: 64.57					
5/10/99	1641721	XRS	LOS ANGELES SUPERIOR 111 N HILL STREET LOS ANGELES CA 90012 Caller: MARY CUMMINGS Time: 08:35 Signed: ret on ctrl 1642113 Time: 16:00	TROOP STEUBER PASICH REDDICK LLP 2029 CENTURY PARK EAST LOS ANGELES CA 90067-3010	Base Chg : Adv Fees : Crt/Rsch :	50.00 15.39 27.00	92.39	
			Your Ref.: SC 13029					
			Total Charges for Ref. - SC 13029: 92.39					
<p>13305-1 TASK # L520</p> <p>13305-1 TASK # L520</p> <p>ell ✓ 5/27/99</p> <p>VENDOR # _____ VOUCHER # <u>200395</u> GL # _____</p>								
TOTAL							156.96	

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward (BK-MKB)
Montgomery Realty Co.
Montgomery Ward (BK-MKB)
535 Chicago Avenue
Suite 24N
Chicago, IL 60610

Date: 07/06/99
File: 013305-0001
Invoice: 135933

FED. NO. 95-3551349

RE: INS. LITIGATION

Balance Due from Previous Statement:	136,510.52
Less Payments Received:	.00
Balance Forward:	136,510.52
For Legal Services Rendered During The Period Through June 30, 1999	
Total Professional Services:	7,810.00
Total Disbursements:	3,720.27
Total Current Charges:	11,530.27
Total Balance Due For Matter 013305-0001	148,040.79
Total Fees Billed from inception to date:	443,232.75
Total Costs Billed from inception to date:	50,094.46

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward (BK-MKB)
FILE NUMBER: 013305-0001
INVOICE NO.: 135933

Jul 6, 1999 PAGE 2

FED. NO. 95-3551349

RE: INS. LITIGATION

MATTER NUMBER: 013305-0001
BILLING ATTORNEY: Mary K. Barnes

DATE	DESCRIPTION OF SERVICES RENDERED	HOURS	FEES
----	-----	-----	----
06/01/99	(L190) Letter to B. Meyers (fee auditor) regarding second fee application (.3). Associate: AEB	.30	58.50
06/02/99	(L510) Research regarding standards regarding filing documents under seal. Principal: JMJ	.70	185.50
06/03/99	(L510) Draft reply regarding request that Montgomery Ward's opening brief be filed under seal; telephone conference with Sara Thorpe regarding stipulation regarding filing dates for briefs. Principal: JMJ	2.40	636.00
06/03/99	(L190) Review and analysis of fee auditor's comments to Troop Steuber Pasich Reddick & Tobey, LLP's response regarding first fee application. Associate: AEB	.20	39.00

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward (BK-MKB)
FILE NUMBER: 013305-0001
INVOICE NO.: 135933

Jul 6, 1999

PAGE 3

FED. NO. 95-3551349

06/04/99 (L190) Handle billing issues regarding fourth fee application. Associate: AEB	.30	58.50
06/07/99 (L510) Draft motion to amend transcript of 7/13/98 hearing. Principal: JMJ	.90	238.50
06/08/99 (L510) Draft declaration regarding motion to correct 7/13/98 transcript; revise motion and declaration to revise transcript; send draft motion to parties for review/comment. Principal: JMJ	.80	212.00
06/09/99 (L520) Research regarding deadline for filing reply briefs where multiple respondents; telephone conference with clerk of court of appeal regarding same; e-mail to K. Pick to respond to inquiry regarding same. Principal: JMJ	1.90	503.50
06/10/99 (L190) Review and analysis of bankruptcy billing. Associate: AEB	.30	58.50
06/11/99 (L510) Telephone conference with S. Thorpe regarding request for extension of time to file respondent's briefs/opening brief on cross-appeal; telephone conference with K. Pick regarding same; conference with M. Barnes regarding same. Principal: JMJ	.50	132.50
06/15/99 (L520) Review Daily Journal case regarding inter-insurer disputes for contribution. Principal: JMJ	.30	79.50

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

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LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward (BK-MKB)
FILE NUMBER: 013305-0001
INVOICE NO.: 135933

Jul 6, 1999

PAGE 4

FED. NO. 95-3551349

06/16/99	(L510) Miscellaneous telephone conferences with S. Thorpe regarding stipulation regarding filing dates for appellate briefs; telephone conference with K. Pick regarding stipulation to extend filing dates for appellate briefs; review and sign stipulation to extend filing dates for appellate briefs. Principal: JMJ	.50	132.50
06/24/99	(L520) Conferences with Jeffrey M. Jacobberger regarding IELA amicus brief. Principal: CLR	.20	55.00
06/24/99	(L510) Review IELA's proposed amicus brief; telephone conference with K. Pick regarding IELA's proposed amicus brief and confer regarding whether to oppose application to appear as amicus; research California Rules of Court regarding amicus curiae; conference with C. Rivard regarding same. Principal: JMJ	2.10	556.50
06/25/99	(L520) Review amicus brief and stipulation to file same (.9); telephone conference with co-counsel K. Pick and J. Jacobberger on issues regarding opposing leave to file brief (.3). Partner: MKB	1.20	396.00
06/25/99	(L520) Conferences with Jeffrey M. Jacobberger regarding IELA amicus brief. Principal: CLR	.30	82.50
06/25/99	(L510) Draft opposition to IELA application regarding proposed amicus brief; read and shephardize cases cited by IELA; conference with C. Rivard regarding strategy for opposing amicus brief application. Principal: JMJ	3.00	795.00

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

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Montgomery Ward (BK-MKB)
FILE NUMBER: 013305-0001
INVOICE NO.: 135933

Jul 6, 1999

PAGE 5

FED. NO. 95-3551349

06/28/99 (L190) Prepare responses to fee report by auditors. Partner: MKB	2.00	660.00
06/29/99 (X510) Research regarding relationship between Zurich-American Insurance Group and Home Insurance Company; research regarding California cases regarding role of amicus curiae; draft opposition to IELA motion to appear as amicus curiae. Principal: JMJ	7.40	1961.00
06/29/99 (L520) Review cases regarding requirement to hold oral and evidentiary hearings. Principal: JMJ	.40	106.00
06/30/99 (L520) Review amicus brief; revise opposition to motion for leave to file amicus brief. Partner: MKB	2.00	660.00
06/30/99 (L510) Revise opposition to IELA's motion to appear as amicus curiae (.2); telephone conference with K. Pick regarding review of opposition to IELA's motion to appear as amicus curiae (.2). Principal: JMJ	.40	106.00
06/30/99 (L190) Review and analysis of bankruptcy billing for privileged information. Associate: AEB	.50	97.50
Total Professional Services:		7,810.00

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward (BK-MKB)
FILE NUMBER: 013305-0001
INVOICE NO.: 135933

Jul 6, 1999 PAGE 6

FED. NO. 95-3551349

-----TIME AND FEE SUMMARY-----			
-----TIMEKEEPER-----	RATE	HOURS	FEES
Mary K. Barnes	330.00	5.20	1716.00
Catherine L. Rivard	275.00	.50	137.50
Jeffrey M. Jacobberger	265.00	21.30	5644.50
Antony E. Buchignani	195.00	1.60	312.00
TOTALS		28.60	7810.00

DESCRIPTION	AMOUNT
Photocopying	90.60
Messenger	97.07
Outside Photocopying	3500.81
Telephone	31.79

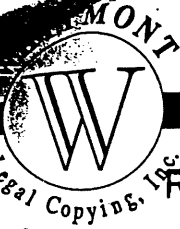
Total Disbursements: 3,720.27

Balance From Previous Statement: 136,510.52
Less Payments Received: .00
Balance Forward: 136,510.52

Total Professional Services: 7,810.00
Total Disbursements: 3,720.27

Total Current Charges: 11,530.27

Total Balance Due For This Matter: 148,040.79



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JUN 04 1999

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Suite 2200
Los Angeles, CA 90024

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Attn.: Mary Cummings



ACCT. EXEC	REFERENCE NO. / P.O. NO.	CONTACT NAME	ORDER DATE
Steve B.	13305-1 Task L520	Mary Cummings	5/20/99

QUANTITY	DESCRIPTION	PRICE
32,340	Light Litigation Copies	\$2,910.60
6,468	Bates Labels Generated and Applied - Bates Range: 00001 - 06468	323.40

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Sales Tax
Non-Taxable Subtotal

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266.81
0.00

Total Invoice Amount

\$3,500.81

Terms
Due Date

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6/4/99

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INVOICE NUMBER 73592	CUSTOMER NUMBER 3008
INVOICE DATE 5/31/99	TOTAL AMOUNT DUE 1,036.99
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OVER 60 DAYS .00	OVER 90 DAYS 659.65

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TO ENSURE PROPER APPLICATION PAYMENT
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 INVOICE NUMBER ON YOUR CHECK.

TROOP STEUBER PASICH REDDICK LLP
 ATT: ELIZABETH NGUYEN
 2029 CENTURY PARK E. 24TH FLR
 LOS ANGELES, CA 90067-3010

ell 6/10/99

EXPRESS NETWORK, INC
 FIDELITY NATIONAL FINANCE
 DEPT. 0768
 LOS ANGELES, CA 90088-0768

PLEASE DETACH HERE AND RETURN WITH REMITTANCE

EXPRESS NETWORK, INC		CUSTOMER NO.	INVOICE NO.	INVOICE FOR PERIOD ENDING	AMOUNT DUE	PAGE	FIDELITY NATIONAL FINANCE	
		3008	73592	5/31/99	1,036.99	1		
DATE	JOB NO.	SVC TYPE	SERVICE DETAIL				CHARGE BREAKDOWN	TOTAL
5/13/99	1644125	SDR	LOS ANGELES SUPERIOR COURT 111 NORTH HILL STREET LOS ANGELES CA 90012 Caller: MARY X3608 Time: 12:26 Signed: COMPLETED-RTND 1646111 Time: 16:00	TROOP STEUBER PASICH REDDICK LLP 2029 CENTURY PARK EAST LOS ANGELES CA 90067-3010	Base Chg : Adv Fees : Crt/Rsch :	32.00 29.07 36.00	97.07	
			Your Ref.: 13305-1					
			Total Charges for Ref. - 13305-1: 97.07					
5/14/99	1645175	XRS	LOS ANGELES SUPERIOR COURT 111 NORTH HILL STREET LOS ANGELES CA 90012 Caller: MARY E CUMMINGS Time: 16:26 Signed: COMPLETED-RTND 1646111 Time: 16:00	TROOP STEUBER PASICH REDDICK LLP 2029 CENTURY PARK EAST LOS ANGELES CA 90067-3010	Base Chg : Adv Fees : Crt/Rsch :	50.00 1.71 18.00	69.71	
			Your Ref.: 3305-1					
			Total Charges for Ref. - 3305-1: 69.71					
						TOTAL	166.78	

1999 JUN 14 PM 3:15

BATCH 37804

8006-166.78

201017

INVOICE PAYMENT DUE UPON RECEIPT

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward (BK-MKB)
Montgomery Realty Co.
535 Chicago Avenue
Suite 24N
Chicago, IL 60610

Date: 08/11/99
File: 013305-0001
Invoice: 137652

FED. NO. 95-3551349

RE: INS. LITIGATION

Balance Due from Previous Statement:	129,769.63
Less Payments Received:	50,917.86
Balance Forward:	78,851.77
For Legal Services Rendered During The Period Through July 31, 1999	
Total Professional Services:	1,038.50
Total Disbursements:	705.50
Total Current Charges:	1,744.00
Total Balance Due For Matter 013305-0001	80,595.77
Total Fees Billed from inception to date:	451,042.75
Total Costs Billed from inception to date:	53,814.73

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward (BK-MKB)
FILE NUMBER: 013305-0001
INVOICE NO.: 137652

Aug 11, 1999 PAGE 2

FED. NO. 95-3551349

RE: INS. LITIGATION

MATTER NUMBER: 013305-0001
BILLING ATTORNEY: Mary K. Barnes

DATE	DESCRIPTION OF SERVICES RENDERED	HOURS	FEES
07/01/99	(L510) Revise opposition to motion for leave to file amicus and office conference with J. Jacobberger regarding same. Partner: MKB	.80	264.00
07/01/99	(L510) Conference with M. Barnes regarding revisions/comments regarding opposition to IELA's application for leave to file amicus brief (.1); conference with K. Pick regarding revisions/comments regarding opposition to IELA's application for leave to file amicus brief (.1); draft proposed order denying IELA application (.1); revise/finalize opposition to IELA application to file amicus brief (.3). Principal: JMJ	.60	159.00
07/07/99	(L190) Telephone conference with B. Meyers (fee auditor) re second fee application (.2); draft response to fee auditor report (.3). Associate: AEB	.50	97.50

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward (BK-MKB)
FILE NUMBER: 013305-0001
INVOICE NO.: 137652

Aug 11, 1999

PAGE 3

FED. NO. 95-3551349

07/08/99 (L190) Review report regarding auditors response. Partner: MKB	.50	165.00
07/08/99 (L510) Office conference with J. Jacobberger regarding order regarding amicus briefs. Partner: MKB	.20	66.00
07/08/99 (L190) Telephone conference with fee auditor re recoupment of fees. Associate: AEB	.20	39.00
07/09/99 (L510) Telephone conference with J. Forbes regarding opposition to IELA application to file amicus brief; review Court of Appeal order denying IELA application to file amicus brief; telephone conference with K. Pick regarding denial of application to file amicus brief; telephone conference with S. Thorpe regarding motion to amend 7/13/98 transcript. Principal: JMJ	.20	53.00
07/12/99 (L190) Review and analysis of bankruptcy billing statements (.3). Associate: AEB	.30	58.50
07/28/99 (L190) Conference with Mary K. Barnes regarding response to fee auditor's comments (.2); telephone conference with fee auditor regarding same (.2). Associate: AEB	.40	78.00
07/29/99 (L190) Letter to fee auditor regarding second and third fee applications. Associate: AEB	.30	58.50

Total Professional Services:

1,038.50

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward (BK-MKB)
FILE NUMBER: 013305-0001
INVOICE NO.: 137652

Aug 11, 1999 PAGE 4

FED. NO. 95-3551349

-----TIME AND FEE SUMMARY-----			
-----TIMEKEEPER-----	RATE	HOURS	FEEES
Mary K. Barnes	330.00	1.50	495.00
Jeffrey M. Jacobberger	265.00	.80	212.00
Antony E. Buchignani	195.00	1.70	331.50
TOTALS		4.00	1038.50

DESCRIPTION	AMOUNT
Attorney Service	109.00
Photocopying	25.95
Federal Express	66.00
Messenger	26.70
Computerized Legal Research	300.24
Telephone	8.46
05/22/99 Federal Express - Invoice #7-634-23558 delivery on 5/11/99 from M. Cummins to K. Pick.	63.05
05/22/99 Federal Express - Invoice #7-634-23558 delivery on 5/11/99 from M. Cummins to K. Pick.	61.10
07/10/99 Federal Express - Invoice 7-635-84586 delivered on 7/1/99 from J. Jacobberger to K. Pick.	9.00
07/10/99 Federal Express - Invoice 7-635-84586 delivered on 7/1/99 from J. Jacobberger to K. Hunter.	9.00
07/10/99 Federal Express - Invoice 7-635-84586 delivered on 7/1/99 from J. Jacobberger to R. Sinott.	9.00
07/10/99 Federal Express - Invoice 7-635-84586 delivered on 7/1/99 from J. Jacobberger to Laura/Wiley Rein & Fielding.	9.00
07/10/99 Federal Express - Invoice 7-635-84586 delivered on 7/1/99 from J. Jacobberger to J. Forbes.	9.00
Total Disbursements:	705.50

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
LAWYERS

2029 CENTURY PARK EAST
SUITE BLC 17-253
LOS ANGELES, CALIFORNIA 90067-3010
TELEPHONE (310) 728-3200

Montgomery Ward (BK-MKB)
FILE NUMBER: 013305-0001
INVOICE NO.: 137652

Aug 11, 1999

PAGE 5

FED. NO. 95-3551349

Balance From Previous Statement:	129,769.63
Less Payments Received:	50,917.86
Balance Forward:	78,851.77
Total Professional Services:	1,038.50
Total Disbursements:	705.50
Total Current Charges:	1,744.00
Total Balance Due For This Matter:	80,395.77



Invoice No: 7-634-84663
 Invoice Date: Jun 12, 1999
 Account Number: 1762-2913-6
 Page 41 of 59

Payment Type Detail

Picked up: Jun 04, 1999	Payor: Shipper	Reference: 13305-1	✓
• Distance Based Pricing, Region 4			
Airbill	809531249318	<u>Sender</u>	<u>Recipient</u>
Service Type	FedEx Priority Overnight	JEFFREY M JACOBBERGER	KATHERINE A MUNTER ESQ
Package Type	FedEx Letter	TROOP STEUBER PASICH REDDICK	GORDON & REES
Region	4	2029 CENTURY PARK E STE 2400	275 BATTERY ST 80TH FL
Pieces	1	LOS ANGELES CA 90067-3010 US	SAN FRANCISCO CA 94111-0000 US
Weight	0		
Delivered	Jun 07, 1999 08:44	Transportation Charge	9.50
Service			
Area Code	A1	Total Transportation Charges	USD \$ 9.50
Signed by	O.ANDINO		

FedEx Internal Use: 015914392/00626/_/_

Picked up: Jun 04, 1999	Payor: Shipper	Reference: 13305-1	✓
• Distance Based Pricing, Region 4			
Airbill	809531249329	<u>Sender</u>	<u>Recipient</u>
Service Type	FedEx Priority Overnight	JEFFREY M JACOBBERGER	ALBERTSEN-MURRAY ESQ
Package Type	FedEx Letter	TROOP STEUBER PASICH REDDICK	LILLICK & CHARLES
Region	4	2029 CENTURY PARK E STE 2400	TWO EMBARCADERO CENTER 2600
Pieces	1	LOS ANGELES CA 90067-3010 US	SAN FRANCISCO CA 94111-3996 US
Weight	0		
Delivered	Jun 07, 1999 09:22	Transportation Charge	9.50
Service			
Area Code	A1	Total Transportation Charges	USD \$ 9.50
Signed by	P.NELSON		

FedEx Internal Use: 015914432/00626/_/_

Picked up: Jun 04, 1999	Payor: Shipper	Reference: 13371-1	✓
• Distance Based Pricing, Region 2			
Airbill	808849506041	<u>Sender</u>	<u>Recipient</u>
Service Type	FedEx Standard Overnight	T SCHIFF	JOHN AINSORTH PERMIT SUPR
Package Type	FedEx Letter	TROOP STEUBER PASICH REDDICK	CALIFORNIA COASTAL COMMISSION
Region	2	2029 CENTURY PARK E STE 2400	89 S CALIFORNIA ST STE 200
Pieces	1	LOS ANGELES CA 90067-3010 US	VENTURA CA 93001-0000 US
Weight	0		
Delivered	Jun 07, 1999 12:03	Transportation Charge	9.00
Service			
Area Code	AA	Total Transportation Charges	USD \$ 9.00
Signed by	M.DING		

FedEx Internal Use: 015914431/00598/_/_



Invoice No: 7-634-84663
Invoice Date: Jun 12, 1999
Account Number: 1762-2913-6
 Page 40 of 59

Payment Type Detail

Dropped off: Jun 04, 1999		Payor: Shipper	Reference: 12120-13	
<ul style="list-style-type: none"> Distance Based Pricing, Region 4 				
Airbill	808755499108	<u>Sender</u>	<u>Recipient</u>	
Service Type	FedEx Priority Overnight	DONDA KORNFELID	DOMINICA ANDERSON	
Package Type	FedEx Letter	TROOP STEUBER PASICH REDDICK	HANCOCK ROTHERT & BUNSHOFT	
Region	4	2029 CENTURY PARK E STE 2400	4 EMBARCADERO CENTER	
Pieces	1	LOS ANGELES CA 90067-3010 US	SAN FRANCISCO CA 94111-0000 US	
Weight	0			
Delivered Service	Jun 07, 1999 10:25	Transportation Charge		9.50
Area Code	A1	Total Transportation Charges	USD \$	9.50
Signed by	I.VINSON			

FedEx Internal Use: 015917551/00626/_/_

Picked up: Jun 04, 1999		Payor: Shipper	Reference: 12120-13	
<ul style="list-style-type: none"> Distance Based Pricing, Region 2 FedEx has audited this airbill for correct pieces, weight, and service. Any changes made are reflected in the invoice amount. 				
Airbill	810207820901	<u>Sender</u>	<u>Recipient</u>	
Service Type	FedEx Priority Overnight	STEVE D	KATHLEEN KROG	
Package Type	FedEx Pak	TROOP STEUBER PASICH REDDICK	KPMG	
Region	2	2029 CENTURY PARK E STE 2400	725 S FIGUEROA STREET	
Pieces	1	LOS ANGELES CA 90067-3010 US	LOS ANGELES CA 90017-0000 US	
Weight	1.0 lbs			
Delivered Service	Jun 07, 1999 10:12	Transportation Charge		13.00
Area Code	A1	Total Transportation Charges	USD \$	13.00
Signed by	F.SPEARS			

FedEx Internal Use: 015914431/03987/_/_

Picked up: Jun 04, 1999		Payor: Shipper	Reference: 13305-1	
<ul style="list-style-type: none"> Distance Based Pricing, Region 7 				
Airbill	809531249307	<u>Sender</u>	<u>Recipient</u>	
Service Type	FedEx Priority Overnight	JEFFREY M JACOBBERGER	KAY L PICK ESQ	
Package Type	FedEx Letter	TROOP STEUBER PASICH REDDICK	HEDLUND HANLEY & JOHNS	
Region	7	2029 CENTURY PARK E STE 2400	233 S WACKER DR STE 5700	
Pieces	1	LOS ANGELES CA 90067-3010 US	CHICAGO IL 60606-0000 US	
Weight	0			
Delivered Service	Jun 07, 1999 10:06	Transportation Charge		9.50
Area Code	A1	Total Transportation Charges	USD \$	9.50
Signed by	G.HILL			

FedEx Internal Use: 015914392/00626/_/_



Name: MARY K. BARNES
Position: Partner
Direct Phone: (310) 728-3219
Fax: (310) 728-2219
E-mail: mkbarnes@trooplaw.com

Areas of Practice:

Entertainment and Advertising Litigation, General Business Litigation, Insurance Coverage Litigation

Expertise/Matters Profile:

Ms. Barnes has a broad general commercial litigation practice, with specialties in real estate, entertainment, advertising, products liability, and insurance coverage. Her substantial trial experience includes six jury trials. Ms. Barnes served as lead trial counsel in a jury trial in 1994 where her clients were awarded over \$4.0 million in compensatory damages in a real estate fraud action and another trial in 1998 where her clients were awarded over \$400,000. In 1993, she represented Northrop Corporation in a jury trial where the jury awarded \$6.74 million in compensatory damages and \$12 million in punitive damages. Ms. Barnes also successfully defended Fox, Inc. and entertainer Bette Midler in a 1993 jury trial where her clients obtained a non-suit. She has argued five times before the California Court of Appeal, and obtained favorable decisions in each case. Ms. Barnes also has represented various motion picture studios and producers in numerous lawsuits, including contract disputes, motion picture accounting disputes, insurance matters, and idea submission cases.

Education/Professional Designations:

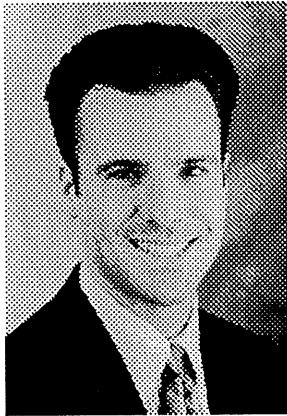
University of California at Los Angeles School of Law, Los Angeles, California; Juris Doctor, 1983

University of Southern California, Los Angeles, California; Bachelor of Arts, *magna cum laude*, Phi Beta Kappa, 1980

Admitted to Practice:

State of California

United States District Court; Central and Southern Districts, California



Name: ANTONY E. BUCHIGNANI
Position: Associate
Direct Phone: (310) 728-3370
Fax: (310) 728-2370
E-mail: aebuchignani@trooplaw.com

Areas of Practice:

General and Complex Business Litigation, Insurance Coverage Litigation.

Expertise/Matters Profile:

Mr. Buchignani conducts a commercial litigation practice, specializing in insurance coverage litigation. He has been involved extensively in major multi-party insurance coverage litigation and has represented insureds faced with substantial insurance coverage disputes. In the general litigation area, Mr. Buchignani has been involved in general and complex business disputes and has advised a wide range of clients, from major Fortune 500 multinational corporations to small enterprises and individuals.

Education/Professional Designations:

University of California, Hastings College of the Law, San Francisco, California; Juris Doctor, 1996

Saint Mary's College of California, Moraga, California; Bachelor of Arts, Psychology, *magna cum laude*, 1993

Professional Affiliations:

American Bar Association
Los Angeles County Bar Association

Admitted to Practice:

State of California
United States District Court, Central District, California



Name: JAMES J. CICCONE
Position: Partner
Direct Phone: (310) 728-3231
Fax: (310) 728-2231
E-mail: jjciccone@trooplaw.com

Areas of Practice:

Business Litigation, Insurance Coverage

Expertise/Matters Profile:

Mr. Ciccone's practice areas include business and insurance coverage litigation. In the business context, he has handled contract, tort and real estate disputes. In the insurance area, Mr. Ciccone has litigated a wide variety of cases, both large and small, including complex disputes involving environmental, toxic tort, and products liabilities. He has developed a special expertise in matters relating to Lloyd's of London and the London Insurance Market. Mr. Ciccone has participated in many coverage cases on behalf of the Firm's clients in which British insurers were prominent. He also represents a number of large American policyholders as an active member of the creditors' committees of various insolvent British insurance companies.

Education/Professional Designations:

George Washington University Law School, Washington, D.C.; Juris Doctor, with honors, 1988

Tufts University, Medford, Massachusetts; Bachelor of Science, *cum laude*, 1985

Admitted to Practice:

State of California
State of New York



Name: AMY J. FINK
Position: Associate
Direct Phone: (310) 728-3330
Fax: (310) 728-2330
E-mail: ajfink@trooplaw.com

Areas of Practice:

General Commercial Litigation

Expertise/Matters Profile:

General commercial litigation with specialties in insurance coverage litigation. In the insurance coverage area, Ms. Fink has been involved extensively in major multi-party complex insurance coverage litigation and has represented insureds faced with substantial insurance coverage disputes involving, among other things, environmental contamination, earthquake and fire losses, business interruption, professional liability and advertising liabilities. In the general litigation area, she has represented clients involved in general business disputes.

Education/Professional Designations:

University of California, Hastings College of the Law, San Francisco, California; Juris Doctor, 1993

University of California at San Diego, La Jolla, California; Bachelor of Arts, 1990

Admitted to Practice:

State of California

United States District Court: Central District, California

United States Court of Appeals: Ninth Circuit



Name: JEFFREY M. JACOBBERGER

Position: Principal

Direct Phone: (310) 728-3321

Fax: (310) 728-2321

E-mail: jmjacobberger@trooplw.com

Areas of Practice:

Insurance Coverage Litigation, General Commercial Litigation

Expertise/Matters Profile:

In the insurance coverage area, Mr. Jacobberger has represented insureds in complex multi-party litigation, including coverage disputes involving environmental contamination, earthquake losses, and business interruption claims. In the general litigation area, he has represented clients involved in disputes regarding state procurement statutes and regulations, including false claims litigation.

Education/Professional Designations:

Boalt Hall School of Law, University of California at Berkeley, Berkeley, California; Juris Doctor, 1989

Georgetown University, Washington, D.C.; A.B., *magna cum laude*, 1986

Admitted to Practice:

State of California



Name: MARTIN D. KATZ
Position: Partner
Direct Phone: (310) 728-3218
Fax: (310) 728-2218
E-mail: mdkatz@trooplaw.com

Areas of Practice:

Complex Business Litigation, including Entertainment Litigation, Insurance Coverage Litigation (and Risk Management consulting), Construction Defect Litigation, Product Liability Defense Litigation, and Appellate Practice

Expertise/Matters Profile:

Complex business litigation, particularly entertainment, insurance coverage and construction defect litigation. Entertainment background includes representation of studios, post-production and radio broadcasting companies for various types of claims including those relating to motion picture and television distribution rights, broadcast content, employee misconduct, vertical integration, idea submission, and various accounting issues. Insurance coverage background includes handling coverage disputes for mass tort, environmental, products liability, construction defect, earthquake, entertainment and employment-related claims and losses, and insurance company bad faith, as well as Risk Management consulting. Mr. Katz has extensive expertise concerning many aspects of, and issues relating to, insurance placed in the London Market. He also has substantial trial and appellate experience. Mr. Katz served as lead counsel in the matter giving rise to the published decision in Martin Marietta Corp. v. Insurance Co. of North America, 40 Cal. App. 4th 1113 (1995). He was an integral member of the trial and appellate team that culminated in the published decision Armstrong World Industries, Inc. v. Aetna Casualty & Surety Co., 45 Cal. App. 4th 1 (1996). Mr. Katz also was co-lead counsel for a medical device manufacturer in a complex coverage matter involving allegedly defective heart valves implanted in tens of thousands of patients, and he has extensive experience representing pharmaceutical and high-tech companies.

Education/Professional Designations:

University of Michigan School of Law, Ann Arbor, Michigan; Juris Doctor, *cum laude*, 1983
Northwestern University, Chicago, Illinois; Bachelor of Arts, Phi Beta Kappa, 1980

Admitted to Practice:

State of California, various Federal District Courts



Name: CATHERINE L. RIVARD
Position: Principal
Direct Phone: (310) 728-3308
Fax: (310) 728-2308
E-mail: clrivard@trooplw.com

Areas of Practice:

Insurance Coverage Litigation

Expertise/Matters Profile:

Ms. Rivard has represented clients nationwide in disputes involving a variety of insurance products, including general liability, crime/fidelity, workers' compensation/employers' liability, first-party property, marine, and title insurance, applied to such diverse losses as asbestos personal injury, environmental pollution, products liability, employment discrimination, and white collar crimes. While having experience in all stages of coverage disputes, from initial identification of potential coverage through tendering of claims, litigation, and settlement, she specializes in appeals.

Education/Professional Designations:

Northwestern University School of Law, Chicago, Illinois; Juris Doctor, 1986
Lake Forest College, Lake Forest, Illinois; Occidental College, Los Angeles, California;
Bachelor of Arts, *cum laude*, 1982

Admitted to Practice:

State of California

State of Florida

United States District Court; Central District, California



Name: NAOMI A. SPINA
Position: Associate
Direct Phone: (310) 728-3376
Fax: (310) 728-2376
E-mail: naspina@trooplw.com

Areas of Practice:
Insurance Coverage Litigation

Expertise/Matters Profile:
General civil litigation; Insurance coverage.

Education/Professional Designations:
Cambridge University Law School, Cambridge, England. (1993). MA (Cantab).
Inns Of Court School Of Law, London, England. Barrister.

Professional Affiliations:
Honourable Society of The Middle Temple (England).
Los Angeles County Bar Association.

Admitted to Practice:
England and Wales
State of California



Name: DAVID W. STEUBER

Position: Partner;
Litigation Department Chair;
Entertainment Litigation Group
Chair

Direct Phone: (310) 728-3202

Fax: (310) 728-2202

E-Mail: dwsteuber@trooplw.com

Areas of Practice:

Complex business litigation, including sophisticated entertainment, insurance coverage, banking and securities litigation

Expertise/Matters Profiles:

Mr. Steuber specializes in sophisticated litigation matters, notably in the entertainment and insurance coverage field. He is and has been lead counsel in significant entertainment litigation, involving copyright, trademark and other issues of importance to the entertainment industry. Mr. Steuber also represents numerous insureds faced with substantial insurance coverage disputes involving, among other things, medical device, Superfund, asbestos-related, environmental contamination, director and officer, first party property, and various toxic tort matters. Likewise, he has been lead counsel on major banking and securities litigation and other substantial pending insurance coverage cases. Mr. Steuber is an active trial and appellate lawyer, who has been lead trial and appellate counsel in seminal cases such as AIU Insurance Company vs. Superior Court (FMC Corporation), 51 Cal. 3d 807 (1990), Armstrong World Industries, Inc. v. Aetna Casualty & Surety Co., 45 Cal. App. 4th 1 (1996), Certain Underwriters at Lloyd's of London v. Superior Court (Southern California Gas Company), 56 Cal. App. 4th 952 (1997), Wolf v. Banco Nacional de Mexico, 739 F.2d 1458 (9th Cir. 1984), cert. denied 105 S.Ct. 784 (1985), and West v. Multibanco Comermex, 807 F.2d 820 (9th Cir. 1986), cert. denied 107 S.Ct. 2483.

Education/Professional Designations:

University of Virginia Law School, Charlottesville, Virginia; Juris Doctor, 1973, Order of the Coif, Law Review
Trinity College, Hartford, Connecticut; Bachelor of Arts, 1970, Student Body President 1969-70

Publications and Lectures:

Mr. Steuber has lectured and written extensively on subjects relating to the rights and obligations of insureds and insurers in various insurance coverage contexts. He has authored or co-authored numerous articles, and been a frequent lecturer at programs sponsored by, among others, Executive Enterprises, The Practising Law Institute, American Bar Association, Los Angeles County Bar Association, the Rutter Group, and the California Judges Association.

Professional Affiliations:

Mr. Steuber also participates in a number of other legal and community-related activities. He is a member of the Board of Directors of the Los Angeles County Bar Association Foundation. Mr. Steuber has served as judge pro tem on the Municipal Court, Los Angeles Judicial District, as past chair of the Watts Summer Games and President of the San Marino Schools Foundation, and on the A.B.A. Task Force devoted to complex insurance coverage litigation.

Admitted to Practice:

State of California and numerous federal courts nationwide



Name: GLENN WARNER
Position: Of Counsel
Direct Phone: (310) 728-3248
Fax: (310) 728-2248
E-Mail: gwarner@trooplw.com

Areas of Practice:

Insurance coverage and complex business litigation

Expertise/Matters Profiles:

Mr. Warner has specialized in insurance coverage litigation for the past fourteen years, representing Fortune 500 companies in cases that involve multi-millions of dollars of insurance coverage for alleged asbestos products liability and environmental contamination claims. Prior to that, and for more than sixteen years, he litigated cases in the field of entertainment law, representing motion picture distributors in disputes concerning motion picture distribution rights and independent television producers in disputes over network television exhibition rights.

Education/Professional Designations:

Stanford University, Bachelor of Arts 1948, Juris Doctor 1950, Phi Beta Kappa, Order of the Coif, Managing Editor, Stanford Law Review; Special Assistant Attorney General, Washington

Publications and Lectures:

Mr. Warner has co-authored articles on subjects relating to insurance coverage and entertainment law.

Professional Affiliations:

Mr. Warner served as President of the Pacific Palisades, California, Coordinating Council and is a member of the State Bar of California, the American Bar Association, and the Los Angeles County Bar Association.

Admitted to Practice:

State of California and federal courts nationwide.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

IN RE: :
: Jointly Administered
Montgomery Ward Holding Corp., a : Case No. 97-1409 (PJW)
Delaware corporation, et al., :
: Chapter 11
Debtors. :

FIRST APPLICATION OF
TROOP STEUBER PASICH REDDICK & TOBEY, LLP FOR INTERIM
COMPENSATION AND REIMBURSEMENT OF EXPENSES

Name of Applicant: TROOP STEUBER PASICH REDDICK
& TOBEY, LLP

Authorized to Provide Professional
Services to Debtors

Date of Retention Order: June 16, 1998, nunc pro tunc as of
February 1, 1998

Period for which compensation and
reimbursement are sought: February 1, 1998 -
June 30, 1998

Amount of Compensation sought as
actual, reasonable and necessary \$ 240,567.00

Amount of Expense Reimbursement
sought as actual, reasonable and
necessary \$ 23,951.72

This is an X Interim _____ Final Application

The total time expended for the preparation of this application is approximately 16 hours, and
the corresponding compensation is not requested herein.

This is the first application filed by TROOP STEUBER PASICH REDDICK & TOBEY, LLP

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

IN RE: :
 : Jointly Administered
Montgomery Ward Holding Corp., a : Case No. 97-1409 (PJW)
Delaware corporation, et al., :
 : Chapter 11
Debtors. :

FIRST APPLICATION OF
TROOP STEUBER PASICH REDDICK & TOBEY, LLP FOR INTERIM
COMPENSATION AND REIMBURSEMENT OF EXPENSES

TROOP STEUBER PASICH REDDICK & TOBEY, LLP ("TSPR&T"), special counsel of the above captioned Debtors and Debtors in Possession, hereby makes this First Application for Allowance of Interim Compensation and Reimbursement of Expenses (the "Application") for the period February 1, 1998 through June 30, 1998 (the "Compensation Period"). In support of this Application, TSPR&T states as follows:

INTRODUCTION

1. On July 7, 1997, Montgomery Ward Holding Corp., et al. (collectively the "Debtors") filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code"). The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On June 16, 1998, the Court entered an order pursuant to Section 327(e) of the Bankruptcy Code authorizing the retention and employment of Troop Meisinger Steuber & Pasich ("TMS&P") as special counsel, *nunc pro tunc* to February 1, 1998. A copy of the order authorizing the employment of TMS&P is attached hereto as Exhibit A.

3. On August 1, 1998, TMS&P changed its name to TSPR&T. In addition, effective August 17, 1998, the address and telephone numbers of TSPR&T will change as follows:

TROOP STEUBER PASICH REDDICK & TOBEY, LLP

2029 Century Park East, Suite 2400

Los Angeles, California 90067

Main Telephone: (310) 728-3000

Main Facsimile: (310) 728-2200

A copy of the Notice of Change of Firm Name, Address, and Telephone Numbers is attached hereto as Exhibit B.

COMPENSATION AND EXPENSES REQUESTED

4. This Application is made by TSPR&T pursuant to sections 330(a) and 331 of the Bankruptcy Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and the Administrative Order, Pursuant to Sections 105 and 331 of the Bankruptcy Code, Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, dated July 8, 1997 (the "Administrative Order") for an interim allowance of compensation for professional services rendered to the Debtors in the amount of \$240,567.00 and for reimbursement of expenses incurred in the amount of \$23,951.72 during the Compensation Period.

5. As part of the Administrative Order, the Court authorized the submission of monthly statements of professionals and a procedure by which 80% of fees and 100% of the expenses requested in such monthly statements could be paid by the Debtors. Pursuant to

the Administrative Order, TSPR&T submitted two statements to the Debtors during the Compensation Period:

<u>STATEMENT PERIOD</u>	<u>FEES</u>	<u>EXPENSES</u>
February 1 -May 31, 1998	215,953.50	22,668.29
June 1 - 30, 1998	<u>24,613.50</u>	<u>1,283.43</u>
TOTAL	\$240,567.00	\$23,951.72

In accordance with the Administrative Order, TSPR&T has requested that the Debtors pay 80% of the fees set forth in TSPR&T's two statements, and 100% of the expenses submitted in those statements.

SERVICES RENDERED BY TROOP STEUBER PASICH REDDICK & TOBEY, LLP

6. During the Compensation Period, TSPR&T professionals and paraprofessionals devoted a total of 1081.70 hours rendering services to the Debtors with respect to a California lawsuit involving insurance coverage under general liability policies for environmental liabilities (including defense) of the Debtors of potentially significant economic impact to their estates (the "Litigation"). A summary schedule of the names of each TSPR&T professional and paraprofessional that rendered services to the Debtors in the Litigation, the hourly rates and the total hours charged by each such professional and paraprofessional is attached hereto as Exhibit C.

7. During the Compensation Period; TSPR&T professionals were required to address numerous issues in the Litigation, and provided services that included: (a) preparation of motions for summary adjudication as to Imperial Casualty and Indemnity Company's ("Imperial") duty to defend (the Court determined that Imperial had a duty to defend), The Home Insurance Company's ("The Home") duty to indemnify as to the Pleasant Hill claim

(the Court determined there were issues of fact precluding summary adjudication), the defendants' affirmative defenses (the Court granted the motion in part and denied it in part as to Imperial and Indemnity Insurance Company of North America ("INA"), and denied the motions as to The Home) and a response to Imperial's, INA's and Home's motions for summary adjudication as to allocation of self-insured retentions (the Court ruled that there must be horizontal allocation); (b) analysis of defendants' discovery responses, conferences with defendants regarding their responses, and preparation and argument on Montgomery Ward's motions to compel (the Judge granted some and denied some); (c) supplemental production of Montgomery Ward documents; (d) depositions of various defendants' claims and underwriter personnel; (e) factual investigation of various potential witnesses, including corporate representatives for depositions of Montgomery Ward; (f) trial preparation; and (g) extensive preparation, briefing, and argument at a hearing regarding defendant's motion for allocation of settlement moneys received by Montgomery Ward from certain defendants (the Court granted this motion). These services are further described below.

8. From the time that it was retained by the Debtors through June 30, 1998, TSPR&T has accounted for the time of its professional services in accordance with an agreement with the Debtors. Pursuant to this agreement, all of TSPR&T's professionals kept accurate, contemporaneous time records of the services they rendered. Each task performed was described separately and with sufficient particularity to permit the Debtors to ascertain the benefit of the services provided. All time records represented the actual time required to perform the activity and were recorded in one-tenth of hour increments. At the end of each work day, each professional calculated a single total for the collective services that he or she rendered. Specific project billing codes were not used.

9. TSPR&T only recently became aware of Delaware Bankruptcy Court Local Order No. 32, which requires professionals to account separately for the amount of time they spend on each activity. In an effort to comply with this rule, TSPR&T immediately instructed its professionals and paraprofessionals to provide separate descriptions and time allotments for each activity performed. Accordingly, all time entries from July 1, 1998, forward will reflect this change.

10. In preparing this Application, TSPR&T also attempted to review its prior billing records and separately account for each task performed. However, TSPR&T quickly realized that it would be highly impractical, if not impossible, to make this retroactive accounting with accuracy after such a long period of time had elapsed. For this reason, TSPR&T has not provided a separate time allotment for each activity description.

11. TSPR&T submits that its time entries are sufficiently descriptive to allow this Court to determine whether they are actual, reasonable, and necessary. Accordingly, TSPR&T respectfully requests that this Court waive the separate accounting requirement specified in Local Order No. 32, paragraph IV(F.). To the extent that the Court believes that a particular time entry may be unreasonable or unnecessary, or otherwise feels that additional information is necessary, TSPR&T will provide supplemental information.

12. For its services rendered and expenses paid during the 150 day period of this Application, TSPR&T has submitted to the Debtors two statements that contain detailed information for the services provided on each litigation task, including time entries designating the particular professional rendering a service on each task, and a description of the service rendered on each task. TSPR&T has attached as Exhibit D, a copy of redacted billing statements for the period February 1, 1998 to June 30, 1998. Only information that

would reveal attorney-client communications, attorney work product, or settlement conversations and could be prejudicial to the debtors in the Litigation has been redacted. A general summary of the activities performed to which time was billed during the compensation period is provided below:

13. Fact Investigation/Development: During the Compensation Period, TSPR&T has performed activities that include interviews of client personnel and potential witnesses, and examination of documents related to the fact investigation and development of facts of the cases.

14. Analysis/Strategy: During the Compensation Period, TSPR&T has performed activities that include discussions, writings and meetings on case strategy. The activities within this category during the Compensation Period also included legal research.

15. Experts/Consultants: During the Compensation Period, TSPR&T has worked to identify experts and consultants for the cases, and develop expert opinions in connection with motions for summary adjudication and trial.

16. Other Case Assessment, Development and Administration: During the Compensation Period, TSPR&T has spent time related to the cases that is not attributable to any other overall task. Time in this entry includes time attributable to the bankruptcy.

17. Dispositive Motions: During the Compensation Period, TSPR&T has spent time developing, discussing strategy for, researching, and preparing for argument on the motions for summary adjudication as to Imperial's duty to defend, The Home's duty to indemnify as to the Pleasant Hill claim, the Defendants' affirmative defenses, a response to Imperial's, INA's and The Home's motions for summary adjudication as to allocation of

self-insured retentions, and the Defendant's motion for allocation of settlement sums received by Montgomery Ward from certain defendants.

18. Other Written Motions/Submissions: During the Compensation Period, TSPR&T has developed, prepared and submitted status reports and other written submissions to the court, including motions to compel, a motion for protective order, and an opposition to motion to compel settlement agreements.

19. Written Discovery: During the Compensation Period, TSPR&T has developed, discussed, responded to, objected to and negotiated interrogatories, including participation in mandatory meet and confer conferences with opposing counsel.

20. Document Production: During the Compensation Period, TSPR&T has developed, discussed, responded to, objected to, and negotiated document requests, including participation in mandatory meet and confer conferences with opposing counsel. In addition, during the Compensation Period, TSPR&T has identified documents for production and reviewed documents for privilege, effected production and prepared privilege logs.

21. Depositions: During the Compensation Period, TSPR&T has determined the deponents and the timing and sequence of depositions, discussed the deposition strategy, prepared deposition notices and subpoenas, communicated with opposing and other counsel on scheduling and logistics, planned for and prepared to take depositions, reviewed documents for the deposition preparation, taken depositions, and drafted deposition summaries.

22. Expert Discovery: During the Compensation Period TSPR&T has spent time discussing and preparing experts on insurance and environmental aspects of the insurance issues.

23. Discovery Motions: During the Compensation Period, TSPR&T has developed, discussed strategy for, researched and prepared motions to compel deposition testimony and discovery responses from the defendant insurers. In addition, during the Compensation Period, TSPR&T has prepared for and attended hearings on the motions.

24. Other Trial Preparation and Support: During the Compensation Period, TSPR&T has spent time preparing for the trial in the Litigation, which was previously scheduled for April 13, 1998. Such preparation included pre-trial filings, such as jury instructions, motions in limine, and a trial brief. The trial did not go forward, and the parties were ordered to submit additional briefing with respect to a bifurcation trial.

EXPENSES

25. Section 330 of the Bankruptcy Code authorizes "reimbursement for actual, necessary expenses" incurred by professionals employed in a Chapter 11 case. Accordingly, TSPR&T seeks reimbursement for expenses incurred rendering services during the Compensation Period in the amount of \$23,951.72. Details as to these expenses are in the billing statements attached hereto as Exhibit D.

26. TSPR&T's billing rates do not include charges for photocopying, word processing and other office services because the needs of each client for such services differ. TSPR&T believes that it is fairest to charge each client for the services actually used in these areas, which is TSPR&T's practice in all matters that it handles.

27. TSPR&T's photocopy charges reflect internal costs for the equipment, personnel and supplies required to perform the work. The rate per page is uniform for all of TSPR&T's clients, and at \$0.15 per copy, is fair, reasonable and customary.

28. In accordance with TSPR&T's normal practice, travel and lodging expenses of lawyers based in TSPR&T's Los Angeles office (the only TSPR&T office) who are required to travel for work in the Litigation are reflected in this Application. TSPR&T does not seek reimbursement for first class air fare, luxury accommodations, or deluxe meals, or for personal, incidental charges, such as personal telephone calls and laundry.

29. Other disbursements and expenses have been incurred in accordance with TSPR&T's normal practice of charging clients for expenses clearly related to and required by particular matters. TSPR&T has endeavored to minimize these expenses to the extent possible. In addition, TSPR&T states that it: (a) charges for computer assisted research at the provider's cost, (b) does not charge for domestic outgoing facsimile transmissions, (c) charges for actual long distance carrier charges for outgoing facsimile transmissions, and (d) does not charge for word processing.

STANDARDS

30. To grant a request for compensation pursuant to sections 330 and 331 of the Bankruptcy Code, a court must find that the request is reasonable as determined by the "lodestar" method:

It is now settled that the "lodestar" method of fee calculation developed by the Third Circuit, see Lindy Bros. Builders, Inc. v. American Radiator & Standard Sanitary Corp., 487 F.2d 161, 167 (3d Cir. 1973), is the method to be used to determine a "reasonable" attorney fee in all the federal courts. See Pennsylvania v. Delaware Valley Citizens' Council for Clean Air, 483 U.S. 711 (1987).

In re Cena's Fine Furniture, Inc., 109 B.R. 575, 581 (Bankr. E.D.N.Y. 1990).

The lodestar amount is calculated by multiplying the number of hours reasonably expended by the hourly rate of the professional. Importantly, there is a "strong presumption" that the lodestar amount is reasonable under Section 330 of the Bankruptcy

Code. See In re Drexel Burnham Lambert Group, Inc., 133 B.R. 13, 22 (Bankr. S.D.N.Y. 1991). TSPR&T's lodestar calculation is based on hourly rates that are within the range of hourly rates of comparable firms handling comparable complex insurance litigation on behalf of the insured. Accordingly, TSPR&T's lodestar calculation is reasonable under sections 330 and 331 of the Bankruptcy Code.

CONCLUSION

31. The fees and expenses requested herein by TSPR&T are based on its usual and customary hourly rates and expenses charged during the Compensation Period for work performed for other clients on both insurance and non-insurance litigation matters. Neither TSPR&T, nor any principal, partner or employee thereof, has received or has been promised any compensation for services rendered or to be rendered in any other capacity in connection with these cases.

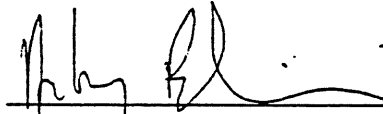
32. No agreement or understanding exists between TSPR&T or any third person for the sharing of compensation, except as allowed by section 504(b) of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 2016 with respect to sharing of compensation between and among partners of TSPR&T.

33. All services for which compensation is requested hereunder were rendered at the request of and solely on behalf of the Debtors, and not on behalf of any other entity.

34. TSPR&T respectfully requests that it be allowed interim compensation for the period February 1, 1998, through June 30, 1998, in the amount of \$240,567.00 for services rendered to the Debtors in connection with the insurance litigation during the Compensation Period and that it be allowed reimbursement of reasonable and necessary expenses incurred during the Compensation Period on behalf of the Debtors in the amount of \$23,951.70.

TSPR&T further requests that the Debtors be authorized and directed to pay TSPR&T the unpaid balance of such allowed fees and expenses¹ and that TSPR&T be granted such other and further relief as the Court deems appropriate.

Respectfully submitted:



Antony E. Buchignani
Troop Steuber Pasich Reddick & Tobey, LLP
10940 Wilshire Boulevard
Los Angeles, California 90024
Special Counsel for the Debtors

¹ As of August 13, 1998, the Debtors had paid to TSPR&T \$171,762.80 and \$22,668.30 for services and expenses, respectively, for the period February 1, 1998, through June 30, 1998.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

IN RE: :
: Jointly Administered
Montgomery Ward Holding Corp., a : Case No. 97-1409 (PJW)
Delaware corporation, et al., :
: Chapter 11
Debtors. :

SECOND APPLICATION OF
TROOP STEUBER PASICH REDDICK & TOBEY, LLP FOR INTERIM
COMPENSATION AND REIMBURSEMENT OF EXPENSES

Name of Applicant: TROOP STEUBER PASICH REDDICK
& TOBEY, LLP

Authorized to Provide Professional
Services to: Debtors

Date of Retention Order: June 16, 1998
(nunc pro tunc as of February 1, 1998)

Period for which compensation and
reimbursement are sought: July 1, 1998 -
October 31, 1998

Amount of Compensation sought as
actual, reasonable and necessary: \$ 27,861.00

Amount of Expense Reimbursement
sought as actual, reasonable and
necessary: \$ 2,387.35

This is an X Interim Final Application

The total time expended for the preparation of this application is approximately twelve (12) hours, and the corresponding compensation is not requested herein.

This is the Second application filed by TROOP STEUBER PASICH REDDICK & TOBEY, LLP

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

IN RE: :
 : Jointly Administered
Montgomery Ward Holding Corp., a : Case No. 97-1409 (PJW)
Delaware corporation, et al., :
 : Chapter 11
Debtors. :

SECOND APPLICATION OF
TROOP STEUBER PASICH REDDICK & TOBEY, LLP FOR INTERIM
COMPENSATION AND REIMBURSEMENT OF EXPENSES

TROOP STEUBER PASICH REDDICK & TOBEY, LLP ("TSPR&T"), special
counsel of the above captioned Debtors and Debtors in Possession, hereby makes this Second
Application for Allowance of Interim Compensation and Reimbursement of Expenses (the
"Application") for the period July 1, 1998 through October 31, 1998 (the "Compensation
Period"). In support of this Application, TSPR&T states as follows:

INTRODUCTION

1. On July 7, 1997, Montgomery Ward Holding Corp., et al. (collectively the
"Debtors") filed voluntary petitions for relief under Chapter 11 of Title 11 of the United
States Code (the "Bankruptcy Code"). The Debtors continue to operate their businesses and
manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the
Bankruptcy Code.
2. On June 16, 1998, the Court entered an order pursuant to Section 327(e) of the
Bankruptcy Code authorizing the retention and employment of Troop Meisinger Steuber &
Pasich ("TMS&P") as special counsel, *nunc pro tunc* to February 1, 1998. A copy of the order
authorizing the employment of TMS&P is attached hereto as Exhibit A.

3. On August 1, 1998, TMS&P changed its name to TSPR&T. In addition, effective August 17, 1998, the address and telephone numbers of TSPR&T changed as follows:

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
2029 Century Park East, Suite 2400
Los Angeles, California 90067
Main Telephone: (310) 728-3000
Main Facsimile: (310) 728-2200

A copy of the Notice of Change of Firm Name, Address, and Telephone Numbers is attached hereto as Exhibit B.

COMPENSATION AND EXPENSES REQUESTED

4. This Application is made by TSPR&T pursuant to sections 330(a) and 331 of the Bankruptcy Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and the Administrative Order, Pursuant to Sections 105 and 331 of the Bankruptcy Code, Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, dated July 8, 1997 (the "Administrative Order") for an interim allowance of compensation for professional services rendered to the Debtors in the amount of \$27,861.00 and for reimbursement of expenses incurred in the amount of \$2,387.35 during the Compensation Period.

5. As part of the Administrative Order, the Court authorized the submission of monthly statements of professionals and a procedure by which 80% of fees and 100% of the expenses requested in such monthly statements could be paid by the Debtors. Pursuant to the Administrative Order, TSPR&T submitted four statements to the Debtors during the Compensation Period:

<u>STATEMENT PERIOD</u>	<u>FEES</u>	<u>EXPENSES</u>
July 1 - 31, 1998	13,773.00	159.36
August 1 - 31, 1998	4,082.50	190.72
September 1 - 30, 1998	2,553.00	21.30
October 1 - 31, 1998	<u>7,452.50</u>	<u>2,015.97</u>
TOTAL	\$27,861.00	\$2,387.35

In accordance with the Administrative Order, TSPR&T has requested that the Debtors pay 80% of the fees set forth in TSPR&T's four statements, and 100% of the expenses submitted in those statements.

SERVICES RENDERED BY TROOP STEUBER PASICH REDDICK & TOBEY, LLP

6. During the Compensation Period, TSPR&T professionals and paraprofessionals devoted a total of 118.40 hours rendering services to the Debtors with respect to a California lawsuit involving insurance coverage under general liability policies for environmental liabilities (including defense) of the Debtors of potentially significant economic impact to their estates (the "Litigation"). A summary schedule of the names of each TSPR&T professional and paraprofessional that rendered services to the Debtors in the Litigation, the hourly rates and the total hours charged by each such professional and paraprofessional is attached hereto as Exhibit C.

7. During the Compensation Period, TSPR&T professionals were required to address numerous issues in the Litigation, and provided services that included: (a) preparation, briefing, and argument regarding application of the Court's prior ruling regarding allocation of self-insured retentions (the Court ruled that there must be horizontal allocation); (b) allocation of settlement moneys received by Montgomery Ward from certain defendants

(upon conclusion of this hearing, the Court effectively granted summary judgment to defendants); (c) discussion with defendants' counsel and briefing regarding miscellaneous issues regarding judgment, including form of judgment and cost bills; (d) formulation of appeal strategy; and (e) preparation of notice of appeal and designation of appellate record. These services are further described below.

8. Pursuant to Delaware Bankruptcy Court Local Order No. 32, TSPR&T has accounted for the time of its professional services in accordance with The American Bar Association Uniform Task-Based Management System: Litigation Code Set. The Uniform Task-Based Management System is a budgeting and billing system designed to provide cost information through the use of codes. It was developed by the American Bar Association Section of Litigation, the American Corporate Counsel Association and a sponsoring group of major corporate law departments and law firms. The codes are grouped into five basic phases or aspects of litigation, including (a) case assessment, development and administration, (b) pre-trial pleadings and motions, (c) discovery, (d) trial preparation and trial, and (e) appeal. Each phases consists of a number of tasks, and there are a total of 29 different tasks that comprise the Litigation Code Set. A copy of the list of tasks that comprise the Litigation Code Set is attached as Exhibit D.

9. For its services rendered and expenses paid during the 123 day period of this Application, TSPR&T has submitted to the Debtors four statements that contain detailed information for the services provided on each litigation task, including time entries designating the particular professional rendering a service on each task, and a description of the service rendered on each task. TSPR&T has attached as Exhibit E, a copy of billing statements for the period July 1, 1998 to October 31, 1998. A general summary of the

activities performed to which time was billed during the compensation period is provided below:

10. Analysis/Strategy: During the Compensation Period, TSPR&T has performed activities that include discussions, writings and meetings on case strategy. The activities within this category during the Compensation Period also included legal research.

11. Other Case Assessment, Development and Administration: During the Compensation Period, TSPR&T has spent time related to the cases that is not attributable to any other overall task. Time in this entry includes time attributable to the bankruptcy.

12. Dispositive Motions: During the Compensation Period, TSPR&T has spent time developing, discussing strategy for, researching, and preparing for argument on defendants' dispositive motion that the Court's ruling regarding Montgomery Ward's obligation to horizontally exhaust "all self-insured retentions," combined with allocation of settlement sums received by Montgomery Ward from certain defendants meant that defendants had no obligation to Montgomery Ward.

13. Post-Trial Motions/Submissions: During the Compensation Period, TSPR&T has developed, prepared and submitted various written submissions to the court, including briefing regarding the form of the proposed judgment, objections to defendants' claimed costs, and preparation of hearing transcripts.

14. Appeal: During the Compensation Period, TSPR&T has filed a notice of appeal and related documents concerning designation of the appellate record; TSPR&T has also conferred with opposing counsel regarding designation of the appellate record.

EXPENSES

15. Section 330 of the Bankruptcy Code authorizes "reimbursement for actual, necessary expenses" incurred by professionals employed in a Chapter 11 case. Accordingly, TSPR&T seeks reimbursement for expenses incurred rendering services during the Compensation Period in the amount of \$2,387.35. Details as to these expenses are in the billing statements attached hereto as Exhibit E.

16. TSPR&T's billing rates do not include charges for photocopying, word processing and other office services because the needs of each client for such services differ. TSPR&T believes that it is fairest to charge each client for the services actually used in these areas, which is TSPR&T's practice in all matters that it handles.

17. TSPR&T's photocopy charges reflect internal costs for the equipment, personnel and supplies required to perform the work. The rate per page is uniform for all of TSPR&T's clients, and at \$0.15 per copy, is fair, reasonable and customary.

18. In accordance with TSPR&T's normal practice, travel and lodging expenses of lawyers based in TSPR&T's Los Angeles office (the only TSPR&T office) who are required to travel for work in the Litigation are reflected in this Application. TSPR&T does not seek reimbursement for first class air fare, luxury accommodations, or deluxe meals, or for personal, incidental charges, such as personal telephone calls and laundry.

19. Other disbursements and expenses have been incurred in accordance with TSPR&T's normal practice of charging clients for expenses clearly related to and required by particular matters. TSPR&T has endeavored to minimize these expenses to the extent possible. In addition, TSPR&T states that it: (a) charges for computer assisted research at the provider's cost, (b) does not charge for domestic outgoing facsimile transmissions, (c) charges

for actual long distance carrier charges for outgoing facsimile transmissions, and (d) does not charge for word processing.

STANDARDS

20. To grant a request for compensation pursuant to sections 330 and 331 of the Bankruptcy Code, a court must find that the request is reasonable as determined by the "lodestar" method:

It is now settled that the "lodestar" method of fee calculation developed by the Third Circuit, see Lindy Bros. Builders, Inc. v. American Radiator & Standard Sanitary Corp., 487 F.2d 161, 167 (3d Cir. 1973), is the method to be used to determine a "reasonable" attorney fee in all the federal courts. See Pennsylvania v. Delaware Valley Citizens' Council for Clean Air, 483 U.S. 711 (1987) .

In re Cena's Fine Furniture, Inc., 109 B.R. 575, 581 (Bankr. E.D.N.Y. 1990).

The lodestar amount is calculated by multiplying the number of hours reasonably expended by the hourly rate of the professional. Importantly, there is a "strong presumption" that the lodestar amount is reasonable under Section 330 of the Bankruptcy Code. See In re Drexel Burnham Lambert Group, Inc., 133 B.R. 13, 22 (Bankr. S.D.N.Y. 1991). TSPR&T's lodestar calculation is based on hourly rates that are within the range of hourly rates of comparable firms handling comparable complex insurance litigation on behalf of the insured. Accordingly, TSPR&T's lodestar calculation is reasonable under sections 330 and 331 of the Bankruptcy Code.

CONCLUSION

21. The fees and expenses requested herein by TSPR&T are based on its usual and customary hourly rates and expenses charged during the Compensation Period for work performed for other clients on both insurance and non-insurance litigation matters. Neither TSPR&T, nor any principal, partner or employee thereof, has received or has been promised


any compensation for services rendered or to be rendered in any other capacity in connection with these cases.

22. No agreement or understanding exists between TSPR&T or any third person for the sharing of compensation, except as allowed by section 504(b) of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 2016 with respect to sharing of compensation between and among partners of TSPR&T.

23. All services for which compensation is requested hereunder were rendered at the request of and solely on behalf of the Debtors, and not on behalf of any other entity.

24. TSPR&T respectfully requests that it be allowed interim compensation for the period July 1, 1998, through October 31, 1998, in the amount of \$27,861.00 for services rendered to the Debtors in connection with the insurance litigation during the Compensation Period and that it be allowed reimbursement of reasonable and necessary expenses incurred during the Compensation Period on behalf of the Debtors in the amount of \$2,387.35. TSPR&T further requests that the Debtors be authorized and directed to pay TSPR&T the unpaid balance of such allowed fees and expenses¹ and that TSPR&T be granted such other and further relief as the Court deems appropriate.

Respectfully submitted:



Antony E. Buchignani
Troop Steuber Pasich Reddick & Tobey, LLP
2029 Century Park East, 24th Floor
Los Angeles, California 90067-3010
Special Counsel for the Debtors

¹ As of December 11, 1998, the Debtors had paid TSPR&T \$16,326.80 and \$371.38 for services and expenses, respectively, for the period July 1, 1998, through October 31, 1998.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

IN RE: :
: Jointly Administered
Montgomery Ward Holding Corp., a : Case No. 97-1409 (PJW)
Delaware corporation, et al., :
: Chapter 11
Debtors. :

THIRD APPLICATION OF
TROOP STEUBER PASICH REDDICK & TOBEY, LLP FOR INTERIM
COMPENSATION AND REIMBURSEMENT OF EXPENSES

Name of Applicant: TROOP STEUBER PASICH REDDICK
& TOBEY, LLP

Authorized to Provide Professional
Services to: Debtors

Date of Retention Order: June 16, 1998
(nunc pro tunc as of February 1, 1998)

Period for which compensation and
reimbursement are sought: November 1, 1998 -
February 28, 1999

Amount of Compensation sought as
actual, reasonable and necessary: \$ 4,126.00

Amount of Expense Reimbursement
sought as actual, reasonable and
necessary: \$ 716.82

This is an X Interim Final Application

The total time expended for the preparation of this application is approximately seven (7) hours, and the corresponding compensation is not requested herein.

This is the Third application filed by TROOP STEUBER PASICH REDDICK & TOBEY, LLP

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

IN RE:

Montgomery Ward Holding Corp., a
Delaware corporation, et al.,

Debtors.

:
: Jointly Administered
: Case No. 97-1409 (PJW)
:
: Chapter 11
:

THIRD APPLICATION OF
TROOP STEUBER PASICH REDDICK & TOBEY, LLP FOR INTERIM
COMPENSATION AND REIMBURSEMENT OF EXPENSES

TROOP STEUBER PASICH REDDICK & TOBEY, LLP ("TSPR&T"), special
counsel of the above captioned Debtors and Debtors in Possession, hereby makes this Third
Application for Allowance of Interim Compensation and Reimbursement of Expenses (the
"Application") for the period November 1, 1998 through February 28, 1999 (the
"Compensation Period"). In support of this Application, TSPR&T states as follows:

INTRODUCTION

1. On July 7, 1997, Montgomery Ward Holding Corp., et al. (collectively the
"Debtors") filed voluntary petitions for relief under Chapter 11 of Title 11 of the United
States Code (the "Bankruptcy Code"). The Debtors continue to operate their businesses and
manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the
Bankruptcy Code.

2. On June 16, 1998, the Court entered an order pursuant to Section 327(e) of the
Bankruptcy Code authorizing the retention and employment of Troop Meisinger Steuber &
Pasich ("TMS&P") as special counsel, *nunc pro tunc* as of February 1, 1998. A copy of the
order authorizing the employment of TMS&P is attached hereto as Exhibit A.

3. On August 1, 1998, TMS&P changed its name to TSPR&T. In addition, effective August 17, 1998, the address and telephone numbers of TSPR&T changed as follows:

TROOP STEUBER PASICH REDDICK & TOBEY, LLP
2029 Century Park East, Suite 2400
Los Angeles, California 90067
Main Telephone: (310) 728-3000
Main Facsimile: (310) 728-2200

A copy of the Notice of Change of Firm Name, Address, and Telephone Numbers is attached hereto as Exhibit B.

COMPENSATION AND EXPENSES REQUESTED

4. This Application is made by TSPR&T pursuant to sections 330(a) and 331 of the Bankruptcy Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and the Administrative Order, Pursuant to Sections 105 and 331 of the Bankruptcy Code, Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, dated July 8, 1997 (the "Administrative Order") for an interim allowance of compensation for professional services rendered to the Debtors in the amount of \$4,126.00 and for reimbursement of expenses incurred in the amount of \$716.82 during the Compensation Period.

5. As part of the Administrative Order, the Court authorized the submission of monthly statements of professionals and a procedure by which 80% of fees and 100% of the expenses requested in such monthly statements could be paid by the Debtors. Pursuant to the Administrative Order, TSPR&T submitted four statements to the Debtors during the Compensation Period:

<u>STATEMENT PERIOD</u>	<u>FEES</u>	<u>EXPENSES</u>
November 1 - 30, 1998	1,244.00	181.32
December 1 - 31, 1998	1,028.00	452.40
January 1 - 31, 1999	615.00	19.20
February 1 - 28, 1999	<u>1,239.00</u>	<u>63.90</u>
TOTAL	\$4,126.00	\$716.82

In accordance with the Administrative Order, TSPR&T has requested that the Debtors pay 80% of the fees set forth in TSPR&T's four statements, and 100% of the expenses submitted in those statements.

SERVICES RENDERED BY TROOP STEUBER PASICH REDDICK & TOBEY, LLP

6. During the Compensation Period, TSPR&T professionals and paraprofessionals devoted a total of 19.10 hours rendering services to the Debtors with respect to an insurance coverage lawsuit pending in California. This action seeks defense and indemnity under general liability policies for certain environmental liabilities of the Debtors of potentially significant economic impact to their estates (the "Litigation"). A summary schedule of the names of each TSPR&T professional and paraprofessional that rendered services to the Debtors in the Litigation, the hourly rates and the total hours charged by each such professional and paraprofessional is attached hereto as Exhibit C.

7. During the Compensation Period, TSPR&T professionals were required to address various issues in the Litigation relating to the appeal proceedings, which are in the early stages. TSPR&T provided services that included (a) ensuring that the record on appeal was prepared and completed; (b) researching certain caselaw relevant to the appeal issues; (c) consulting with co-counsel and counsel for similarly situated insureds regarding the possibility

of filing amicus briefs in support of the appeal; (d) challenging the timeliness of a cross-appeal filed by one defendant/respondent; (e) conducting discussions with defendants' counsel regarding miscellaneous issues regarding judgment, including cost bills; and (f) formulation of appeal strategy. These services are further described below.

8. Pursuant to Delaware Bankruptcy Court Local Order No. 32, TSPR&T has accounted for the time of its professional services in accordance with The American Bar Association Uniform Task-Based Management System: Litigation Code Set. The Uniform Task-Based Management System is a budgeting and billing system designed to provide cost information through the use of codes. It was developed by the American Bar Association Section of Litigation, the American Corporate Counsel Association and a sponsoring group of major corporate law departments and law firms. The codes are grouped into five basic phases or aspects of litigation, including (a) case assessment, development and administration, (b) pre-trial pleadings and motions, (c) discovery, (d) trial preparation and trial, and (e) appeal. Each phase consists of a number of tasks, and there are a total of 29 different tasks that comprise the Litigation Code Set. A copy of the list of tasks that comprise the Litigation Code Set is attached as Exhibit D.

9. For its services rendered and expenses paid during the 120 day period of this Application, TSPR&T has submitted to the Debtors four statements that contain detailed information for the services provided on each litigation task, including time entries designating the particular professional rendering a service on each task, and a description of the service rendered on each task. TSPR&T has attached as Exhibit E, a copy of billing statements for the period November 1, 1998 to February 28, 1999. A general summary of the

activities performed to which time was billed during the compensation period is provided below:

10. Other Case Assessment, Development and Administration: During the Compensation Period, TSPR&T has spent time related to the Litigation that is not attributable to any other overall task. Time in this entry includes time attributable to the bankruptcy.

11. Post-Trial Motions/Submissions: During the Compensation Period, TSPR&T has discussed with opposing counsel certain written submissions to the court regarding defendants' claimed costs.

12. Appellate Motions and Submissions: During the Compensation Period, TSPR&T has also developed strategy and followed new case authority regarding the appellate briefing, has discussed with other interested parties the possibility of filing an amicus brief in support of Montgomery Ward's position on appeal, and has addressed issues relating to the timeliness of a cross-appeal filed in this action by one of the insurance carriers.

EXPENSES

13. Section 330 of the Bankruptcy Code authorizes "reimbursement for actual, necessary expenses" incurred by professionals employed in a Chapter 11 case. Accordingly, TSPR&T seeks reimbursement for expenses incurred rendering services during the Compensation Period in the amount of \$716.82. Details as to these expenses are in the billing statements attached hereto as Exhibit E.

14. TSPR&T's billing rates do not include charges for photocopying, word processing and other office services because the needs of each client for such services differ.

TSPR&T believes that it is fairest to charge each client for the services actually used in these areas, which is TSPR&T's practice in all matters that it handles.

15. TSPR&T's photocopy charges reflect internal costs for the equipment, personnel, and supplies required to perform the work. The rate per page is uniform for all of TSPR&T's clients, and, at \$0.15 per page, is fair, reasonable and customary.

16. In accordance with TSPR&T's normal practice, any travel and lodging expenses of lawyers based in TSPR&T's Los Angeles office (the only TSPR&T office) who are required to travel for work in the Litigation are reflected in this Application. TSPR&T does not seek reimbursement for first class air fare, luxury accommodations, or deluxe meals, or for personal, incidental charges, such as personal telephone calls and laundry.

17. Other disbursements and expenses have been incurred in accordance with TSPR&T's normal practice of charging clients for expenses clearly related to and required by particular matters. TSPR&T has endeavored to minimize these expenses to the extent possible. In addition, TSPR&T states that it: (a) charges for computer assisted research at the provider's cost, (b) does not charge for domestic outgoing facsimile transmissions, (c) charges for actual long distance carrier charges for outgoing facsimile transmissions, and (d) does not charge for word processing.

STANDARDS

18. To grant a request for compensation pursuant to sections 330 and 331 of the Bankruptcy Code, a court must find that the request is reasonable as determined by the "lodestar" method:

It is now settled that the "lodestar" method of fee calculation developed by the Third Circuit, see Lindy Bros. Builders, Inc. v. American Radiator & Standard Sanitary Corp., 487 F.2d 161, 167 (3d Cir. 1973), is the method to be used to

determine a "reasonable" attorney fee in all the federal courts. See Pennsylvania v. Delaware Valley Citizens' Council for Clean Air, 483 U.S. 711 (1987) .

In re Cena's Fine Furniture, Inc., 109 B.R. 575, 581 (Bankr. E.D.N.Y. 1990).

The lodestar amount is calculated by multiplying the number of hours reasonably expended by the hourly rate of the professional. Importantly, there is a "strong presumption" that the lodestar amount is reasonable under Section 330 of the Bankruptcy Code. See In re Drexel Burnham Lambert Group, Inc., 133 B.R. 13, 22 (Bankr. S.D.N.Y. 1991). TSPR&T's lodestar calculation is based on hourly rates that are within the range of hourly rates of comparable firms handling comparable complex insurance litigation on behalf of the insured. Accordingly, TSPR&T's lodestar calculation is reasonable under sections 330 and 331 of the Bankruptcy Code.

CONCLUSION

19. The fees and expenses requested herein by TSPR&T are based on its usual and customary hourly rates and expenses charged during the Compensation Period for work performed for other clients on both insurance and non-insurance litigation matters. Neither TSPR&T, nor any principal, partner or employee thereof, has received or has been promised any compensation for services rendered or to be rendered in any other capacity in connection with these cases.

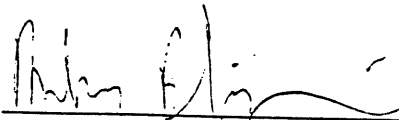
20. No agreement or understanding exists between TSPR&T or any third person for the sharing of compensation, except as allowed by section 504(b) of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 2016 with respect to sharing of compensation between and among partners of TSPR&T.

21. All services for which compensation is requested hereunder were rendered at the request of and solely on behalf of the Debtors, and not on behalf of any other entity.

22. TSPR&T respectfully requests that it be allowed interim compensation for the period November 1, 1998, through February 28, 1999, in the amount of \$4,126.00 for services rendered to the Debtors in connection with the insurance litigation during the Compensation Period and that it be allowed reimbursement of reasonable and necessary expenses incurred during the Compensation Period on behalf of the Debtors in the amount of \$716.82.

TSPR&T further requests that the Debtors be authorized and directed to pay TSPR&T the unpaid balance of such allowed fees and expenses¹ and that TSPR&T be granted such other and further relief as the Court deems appropriate.

Respectfully submitted:



Antony E. Buchignani
Troop Steuber Pasich Reddick & Tobey, LLP
Special Counsel for the Debtors

¹ As of April 8, 1999, the Debtors had paid TSPR&T \$2,309.60 and \$652.92 for services and expenses, respectively, for the period November 1, 1998, through February 28, 1999.