

IN THE UNITED STATES BANKRUPTCY COURT  
 FOR THE NORTHERN DISTRICT OF ILLINOIS  
 EASTERN DIVISION

FILED  
 UNITED STATES BANKRUPTCY COURT  
 NORTHERN DISTRICT OF ILLINOIS  
 JAN 08 2004

KENNETH S. GARDNER, CLERK  
 PS REP. - CS

In re: ) Case No. 02-08699  
 ) (Jointly Administered)  
 NATIONAL STEEL CORPORATION, ) Chapter 11  
 ) Hon. John H. Squires  
et al. )  
 )  
 Debtors. )

**EIGHTEENTH MONTHLY STATEMENT OF PIPER RUDNICK LLP  
 AS COUNSEL TO THE DEBTORS FOR THE PERIOD  
 FROM NOVEMBER 1, 2003 THROUGH NOVEMBER 30, 2003**

Piper Rudnick LLP, counsel to National Steel Corporation ("National Steel") and certain of its subsidiaries and affiliates, debtors and debtors-in-possession (collectively, the "Debtors"), hereby files its Eighteenth Monthly Statement (the "Monthly Statement") for the Period from November 1, 2003 through November 30, 2003 (the "Statement Period"). In support of this Monthly Statement, Piper Rudnick LLP states as follows:

1. On March 6, 2002 (the "Petition Date"), the Debtors each filed voluntary petitions in this Court for reorganization relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. § 101-1330 (as amended, the "Bankruptcy Code"). The Debtors continue to manage and operate their businesses as debtors and debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On April 2, 2002, this Court entered that certain Final Order Pursuant to 11 U.S.C. §§ 327(a) and 329 Authorizing the Employment and Retention of Piper Marbury Rudnick & Wolfe<sup>1</sup> (Docket No. 352).

<sup>1</sup> On April 8, 2002, Piper Marbury Rudnick & Wolfe changed its name to Piper Rudnick. On April 12, 2002, notice of this change was filed with the Court and served on all parties listed on the Master and 2002 Service Lists. On September 1, 2003, Piper Rudnick changed its name to Piper Rudnick LLP.

3. On March 7, 2002, this Court entered that certain Administrative Order Pursuant to 11 U.S.C. §§ 105(a) and 331 Establishing Procedures for Periodic Compensation and Reimbursement of Expenses of Professionals (Docket No. 34) (the "Administrative Order").

4. In accordance with the Administrative Order, Piper Rudnick LLP hereby submits this Monthly Statement, a copy of which is attached hereto as Exhibit A. During the Statement Period, professionals of Piper Rudnick LLP devoted a total of 382.00 hours representing the Debtors for which compensation is sought with a time value of **\$125,536.50**.

5. Additionally during the Statement Period, Piper Rudnick LLP incurred expenses and other charges in the total amount of **\$3,600.86** for which reimbursement is sought. These expenses and charges are summarized in the attached Monthly Statement.

6. Pursuant to the Administrative Order, copies of the Monthly Statement have been served, among others, upon National Steel Corporation, all special counsel to the Debtors retained in these cases, counsel to the Post-Petition Lenders and the Committee, the United States Trustee, Counsel to the Bondholders, Mitsubishi, Marubeni and any other Professional (excluding Ordinary Course Professionals) retained pursuant to Order of this Court in these cases.

7. Unless any such party objects to the Monthly Statement, in whole or in part, on or before 20 days from the date of service of this Monthly Statement, the Debtors shall be authorized to pay the requested fees and expenses to Piper Rudnick LLP in accordance with the terms of the Administrative Order without further order of Court.

8. Piper Rudnick LLP reserves the right to correct, amend, or supplement the Monthly Statement until such time as final compensation and reimbursement is sought from these estates.

Dated: Chicago, Illinois  
January 6, 2004

Respectfully submitted,

**PIPER RUDNICK LLP**

By: 

Mark A. Berkoff (ARDC No. 06194787)  
William Choslovsky (ARDC No. 06224664)  
Steven J. Christenholz (ARDC No. 06224666)

**PIPER RUDNICK LLP**

203 North LaSalle Street, Suite 1800  
Chicago, Illinois 60601-1293  
(312) 368-4000

Attorney for Debtors and  
Debtors-in-Possession

**TIMEKEEPER SUMMARY**

<b>Name of Professional Person</b>	<b>Position of the Applicant,</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Mark A. Berkoff	Partner	\$475.00	36.70	\$17,432.50
David N. Missner	Partner	\$525.00	1.80	\$945.00
Michael B. Fischer	Partner	\$500.00	5.60	\$2,800.00
David G. Lynch	Partner	\$450.00	0.30	\$135.00
John Burke	Partner	\$400.00	11.30	\$4,520.00
Janicc L. Duban	Partner	\$400.00	50.50	\$20,200.00
Marc I. Fenton	Of Counsel	\$390.00	48.80	\$19,032.00
Alison N. Zirn	Partner	\$375.00	2.80	\$1,050.00
William Choslovsky	Associate	\$325.00	50.00	\$16,250.00
Steven Christenholz	Associate	\$325.00	48.60	\$15,795.00
Colleen McManus	Associate	\$325.00	2.40	\$780.00
Vicki J. Baue	Associate	\$315.00	1.90	\$598.50
Deborah M. Gutfeld	Associate	\$260.00	14.50	\$3,770.00
Judith L. Schuch	Associate	\$255.00	46.40	\$11,832.00
Alexander P. Rabinsky	Associatc	\$235.00	4.90	\$1,151.50
Brian Audette	Associate	\$225.00	0.70	\$157.50
Linda Moran	Paralegal	\$175.00	2.30	\$402.50
Nina H. Taylor	Paralegal	\$175.00	47.60	\$8,330.00
Valerie Kropf	Research Librarian	\$130.00	0.20	\$26.00
Amy E. Derby	Project Assistant	\$70.00	4.70	\$329.00
<b>Grand Total:</b>			<b>382.00</b>	<b>\$125,536.50</b>
<b>Blended Rate:</b>	<b>(including paraprofessionals)</b>	<b>\$ 328.63</b>		

**COMPENSATION BY PROJECT CATEGORY**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Asset Dispositions – 0003	7.90	\$3,528.50
Automatic Stay (Relief Actions) -- 0004	0.40	\$130.00
Case Administration – 0006	67.70	\$20,922.00
Claims Administration and Objections - 0007	61.80	\$19,665.00
Consignment/Reclamation/Trust/Fund Claims – 0008	50.90	\$19,799.00
Litigation (General) -- 0018	1.70	\$552.50
Reorganization Plan – 0025	38.70	\$15,210.50
Reports and Schedules – 0026	0.70	\$212.50
Retention/Fee Matters (Piper Rudnick) – 0027	8.10	\$2,497.50
Retention/Fee Matters/Objections – 0028	9.60	\$2,472.00
Secured Claims – 0029	35.00	\$11,073.50
Tax Matters – 0031	12.50	\$3,621.50
Vendor Matters - 0034	87.00	\$25,852.00
<b>Total</b>	<b>382.00</b>	<b>\$125,536.50</b>

**COMPENSATION BY PROJECT CATEGORY  
BY ATTORNEY AND PARAPROFESSIONAL**

<b>Asset Dispositions – 0003</b>		
<b>Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
Michael B. Fischer	5.60	\$2,800.00
Steven Christenholz	0.40	\$130.00
Vicki J. Bauc	1.90	\$598.50
<b>Total</b>	<b>7.90</b>	<b>\$3,528.50</b>

<b>Automatic Stay (Relief Actions) – 0004</b>		
<b>Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
William Choslovsky	0.40	\$130.00
<b>Total</b>	<b>0.40</b>	<b>\$130.00</b>

<b>Case Administration – 0006</b>		
<b>Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
Mark A. Berkoff	13.30	\$6,317.50
Janice L. Duban	1.30	\$520.00
Marc I. Fenton	3.80	\$1,482.00
Colleen E. McManus	2.40	\$780.00
Steven Christenholz	9.40	\$3,055.00
William Choslovsky	14.70	\$4,777.50
Nina H. Taylor	22.80	\$3,990.00
<b>Total</b>	<b>67.70</b>	<b>\$20,922.00</b>

<b>Claims Administration and Objections – 0007</b>		
<b>Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
Mark A. Berkoff	15.50	\$7,362.50
David N. Missner	1.80	\$945.00
Alison N. Zirn	2.80	\$1,050.00
Marc I. Fenton	8.30	\$3,237.00
Steven Christenholz	1.40	\$455.00
William Choslovsky	1.10	\$357.50
Deborah M. Gutfeld	13.30	\$3,458.00
Brian Audette	0.70	\$157.50
Nina H. Taylor	13.90	\$2,432.50
Amy E. Derby	3.00	\$210.00
<b>Total</b>	<b>61.80</b>	<b>\$19,665.00</b>

<b>Consignment/Reclamation/Trust/Fund Claims - 0008</b>		
<b>Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
Janice L. Duban	49.20	\$19,680.00
Amy E. Derby	1.70	\$119.00
<b>Total</b>	<b>50.90</b>	<b>\$19,799.00</b>

<b>Employee Matters - 0018</b>		
<b>Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
William Choslovsky	1.70	\$552.50
<b>Total</b>	<b>1.70</b>	<b>\$552.50</b>

<b>Reorganization Plan - 0025</b>		
<b>Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
Mark A. Berkoff	1.50	\$712.50
John D. Burke	0.30	\$120.00
Marc I. Fenton	36.70	\$14,313.00
William Choslovsky	0.20	\$65.00
<b>Total</b>	<b>38.70</b>	<b>\$15,210.50</b>

<b>Reports and Schedules - 0026</b>		
<b>Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
Mark A. Berkoff	0.30	\$142.50
Nina H. Taylor	0.40	\$70.00
<b>Total</b>	<b>0.70</b>	<b>\$212.50</b>

<b>Retention/Fee Matters (Piper Rudnick) - 0027</b>		
<b>Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
Mark A. Berkoff	3.60	\$1,710.00
Nina H. Taylor	4.50	\$787.50
<b>Total</b>	<b>8.10</b>	<b>\$2,497.50</b>

<b>Retention/Fee Matters/Objections - 0028</b>		
<b>Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
Mark A. Berkoff	2.20	\$1,045.00
Steven Christenholz	0.20	\$65.00
Deborah M. Gutfeld	1.20	\$312.00
Nina H. Taylor	6.00	\$1,050.00
<b>Total</b>	<b>9.60</b>	<b>\$2,472.00</b>

<b>Secured Claims – 0029</b>		
<b>Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
Mark A. Berkoff	0.30	\$142.50
David G. Lynch	0.30	\$135.00
William Choslovsky	31.90	\$10,367.50
Linda Moran	2.30	\$402.50
Valerie Kropf	0.20	\$26.00
<b>Total</b>	<b>35.00</b>	<b>\$11,073.50</b>

<b>Tax Matters – 0031</b>		
<b>Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
Steven Christenholz	7.60	\$2,470.00
Alexander P. Rabinsky	4.90	\$1,151.50
<b>Total</b>	<b>12.50</b>	<b>\$3,621.50</b>

<b>Vendor Matters – 0034</b>		
<b>Name</b>	<b>Total Hours</b>	<b>Total Fees</b>
John Burke	11.00	\$4,400.00
Steven Christenholz	29.60	\$9,620.00
Judith L. Schuch	46.40	\$11,832.00
<b>Total</b>	<b>87.00</b>	<b>\$25,852.00</b>



# Piper Rudnick

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National Steel Corporation  
Attn: Ron Werhnyak  
4100 Edison Lakes Parkway  
Mishawaka, IN 46545

December 31, 2003  
Invoice # 1460240

**Matter Number: 306073-000003**

**Matter Name: Asset Dispositions**

For Legal Services Rendered Through November 30, 2003

For National Steel Corporation

		<u>Hours</u>
11/10/03 M. Fischer	Review request from GOC (JFE, formerly NKK) for payment of May 2003 administrative fee, review Line Access Agreement and May 2003 correspondence to client from GOC with invoice, communicate with Mr. Berkoff re: same and communicate with Mr. Mason (counsel for GOC) re: same to request acknowledgement from DNN as processor.	1.70
11/11/03 M. Fischer	Telephone conference with and e-mail to Mr. Berkoff re: payment of administrative fee to GOC (.30), several communications (e-mail and telephone) with Mr. Mason (counsel for NKK) (.60), calls to Mr. Sobecki re: same (.10), and e-mails to Mr. Berkoff and Ms. McManus re: administrative fee (.50).	1.50
11/12/03 M. Fischer	Telephone calls to Messrs. Berkoff and Sobecki (.20); e-mails to and from messrs. Berkoff and Mason (.40); efforts to resolve matter of administrative fee due under Line Access Agreement (.20).	.80

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11/12/03 V. Baue	Review emails from K. Mason re: the order, administrative fee and supplemental invoice; follow up with S. Christenholz regarding same.	.50
11/13/03 S. Christenholz	Emails and phone conferences with V. Baue re JFE claim.	.40
11/13/03 M. Fischer	Telephone calls to Messrs. Berkoff and Sobecki and communications with Mr. Mason re: administrative fee due under Line Access Agreement.	.60
11/13/03 V. Baue	Telephone calls and emails with K. Mason regarding Affirmation Agreement, Administrative Fee and Supplemental Invoice matters (.40); telephone calls and emails with S. Christenholz and M. Berkoff regarding same (.20).	.60
11/14/03 M. Fischer	E-mails to Ms. McManus and Ms. Baue and to and from Mr. Sobecki re: administrative fee due under Line Access Agreement; review conversion from Canadian to U.S. currency in calculation of administrative fee.	1.00
11/14/03 V. Baue	Telephone calls and emails with K. Mason regarding pending issues with respect to the Affirmation Agreement, Administrative Fee and Supplemental Invoice (.40); telephone calls and emails with M. Berkoff and S. Christenholz regarding same (.10).	.50

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11/18/03 V. Baue Follow up on payment questions .30  
from K. Mason (.20); resend the  
Lawson confirmation to the client  
with a cover note (.10).

Total Hours 7.90

Total Fees \$3,528.50

## T I M E K E E P E R S U M M A R Y

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>FEES</u>
M. Fischer	Partner	5.60	500.00	2,800.00
S. Christenholz	Associate	.40	325.00	130.00
V. Baue	Associate	1.90	315.00	598.50
		=====		=====
TOTALS		7.90		3,528.50

Total Fees and Disbursements \$3,528.50

Total Matter Current Balance \$3,528.50

# Piper Rudnick

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National Steel Corporation  
Attn: Ron Werhnyak  
4100 Edison Lakes Parkway  
Mishawaka, IN 46545

December 31, 2003  
Invoice # 1460241

**Matter Number: 306073-000004**

**Matter Name: Automatic Stay (Relief Actions)**

For Legal Services Rendered Through November 30, 2003

For National Steel Corporation

		<u>Hours</u>
11/05/03 W. Choslovsky	Call from Jamie Liebowitz, lawyer for Hetrick, re: lifting stay in personal injury case; confer with Bill McDonough re: same.	.40
Total Hours		.40
Total Fees		\$130.00

## T I M E K E E P E R S U M M A R Y

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>FEES</u>
W. Choslovsky	Associate	.40	325.00	130.00
TOTALS		.40		130.00

Total Fees and Disbursements \$130.00

Total Matter Current Balance \$130.00

# Piper Rudnick

Fed ID #52-0616490

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National Steel Corporation  
Attn: Ron Werhnyak  
4100 Edison Lakes Parkway  
Mishawaka, IN 46545

December 31, 2003  
Invoice # 1460242

**Matter Number:** 306073-000006

**Matter Name:** Case Administration

For Legal Services Rendered Through November 30, 2003

For National Steel Corporation

		<u>Hours</u>
11/03/03 S. Christenholz	Phone conference with E. Kaup (incl. phone conference w/ D. Gramlich re pending motions) (.5)	.50
11/03/03 M. Berkoff	Telephone conference with D. Zazove (.10); review e-mails from W. Choslovsky re: mechanic's lien claims and miscellaneous other issues (.30).	.40
11/03/03 N. Taylor	Call to/from creditor re: request for document (.2); obtain same document from bankruptcy court web site and send to creditor (.4); review docket for specific order (.4); conference with Marc Fenton re: same (.1); obtain same order (.3).	1.40
11/04/03 S. Christenholz	Phone conference with K. Sobecki re misc. open issues (.2)	.20
11/04/03 N. Taylor	Obtain and send service lists to counsel.	.20
11/05/03 S. Christenholz	Office conference with M. Berkoff re status (.1)	.10

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11/05/03 M. Berkoff	Teleconference with T. Pohl re: status and next steps (.20); office conference with S. Christenholz re: same (.10). Also, review email re: Ziegler releases (.10) and office conferences with W. Choslovsky re: release language in settlements (.30).	.70
11/05/03 N. Taylor	Obtain copy of finding of facts and Order confirming plan (.3); conferences with Marc Fenton re: same (.1).	.40
11/06/03 S. Christenholz	Office conference with J. Duban re reclamation issues (.2)	.20
11/06/03 S. Christenholz	E-mails re: misc. issues (.4).	.40
11/06/03 M. Berkoff	Review emails re: Ziegler, Pyro, DNN and misc. other matters.	.80
11/06/03 N. Taylor	Conference with Steve Christenholz re: time petition was filed (.1); obtain same information (.2)	.20
11/07/03 C. McManus	Telephone conference with Towbin re motion/order on JFE/Dofasco settlement	.10
11/10/03 M. Berkoff	Teleconference with E. Kaup re: Huron (.10); review emails re: Pyro & Ziegler (.30); prepare for November 18 omnibus (.80). Also, office conference with T. Pohl re: next steps (.30).	1.50

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11/10/03 N. Taylor	Draft notice and order for motion to extend discovery deadline (.6); conferences with Steve Christenholz re: same (.2); coordinate filing and service of same (.3).	1.10
11/10/03 C. McManus	Reviewed plan re NKK Litigation Claims & Trust (.80); revised order granting settlement (.30)	1.10
11/11/03 S. Christenholz	Office conference with N. Taylor re agenda (.1)	.10
11/11/03 M. Berkoff	Office conference with M. Fenton re: status and next steps (.10); office conference with S. Christenholz re: Safety Today (.10); teleconference with J. Burke re: same (.10). Also, office conference with W. Choslovsky re: Pyro settlement agreement (.20). Also, field calls from creditors re: case/plan status (.40).	.90
11/11/03 N. Taylor	Review of Judge's Calendar (.3); review of case docket and pleadings (.8); begin to draft agenda (1.4); brief conferences with William Choslovsky and Steve Christenholz re: same (.2).	2.70
11/11/03 C. McManus	Conference with Berkoff re issues arising from motion to settle NKK claims	.20
11/12/03 W. Choslovsky	Prepare agenda for 11/17 hearing date, including contacting lawyers on agenda and reviewing all pleadings; confer with Nina Taylor re: same.	3.30

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11/12/03 S. Christenholz	Office conference with M. Berkoff re: status and payment of JFE claim (.5); e-mails with V. Baue re same (.4); P/c with counsel for JFE re: same (.2); reviewed agenda and o/c's re: same (.4)	1.50
11/12/03 M. Berkoff	Teleconferences with K. Sobecki and P. Hourihan re: mediation issues (.30); office conference with S. Christenholz re: same (.10); review C. Springer email re: matters up on November 18 (.10). Also, conference call with D. Zinn and counsel for Spectra re: release provisions (.30); follow-up teleconference from D. Zinn (.10).	.90
11/12/03 M. Berkoff	Teleconference from K. Sobecki re: Vock matter, Pyro and JFE (.30); office conferences with W. Choslovsky re: Pyro, November 18 agenda and miscellaneous other matters (.30).	.60
11/12/03 N. Taylor	Conferences with William Choslovsky re: agenda (.2); coordinate additions to the list of interested parties (.3).	.50
11/12/03 C. McManus	Reviewed Berkoff's and Fischer's emails re NKK settlement numbers (.20); reviewed Towbin's revisions to settlement order (.20)	.40
11/13/03 M. Fenton	Review agenda and revise for November Omnibus hearing (.70); confer with N. Taylor regarding revisions and possible additions (.30).	1.00



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11/13/03 N. Taylor	Revise agenda (.9); conferences with Janice Duban and E. Kaup re: agenda items (.3); review calendar and docket re: same (.8); e-mail agenda for review and comments (.2); coordinate filing of certificate of service for 8th omnibus objection (.3);	2.50
11/13/03 C. McManus	Exchanged emails with Fischer and Berkoff re NKK claim amount and reviewed Smolev & Zazove's responses	.20
11/14/03 W. Choslovsky	Draft and edit November 18 hearing agenda; numerous calls/e-mails to/from Nina Taylor re: same.	3.10
11/14/03 M. Fenton	Continued review and revisions to November Agenda for Omnibus hearing (1.20); discuss revisions with N. Taylor (.40); confer with N. Taylor and W. Choslovsky regarding revisions to agenda (.20).	1.80
11/14/03 N. Taylor	Conferences with William Choslovsky and Marc Fenton re: Agenda (.5); revisions to Agenda (.6); Conference with A. Askew re: revisions to calendar (.2); revise Agenda to conform to calendar (.5); review of docket (.3); coordinate preparation of service list for interested parties (.3); coordinate filing and service of Agenda (.3); e-mail Agenda to Debtor and counsel per requests (.3).	3.00

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11/14/03 C. McManus	Reviewed/exchanged emails with client, Fischer and Zazove re NKK settlement order	.20
11/17/03 W. Choslovsky	Prepare for November 18 hearing, including drafting orders and contacting counsel with motions on docket (2.10); confer with M. Berkoff, S. Christenholz, N. Taylor and J. Duban to review hearing agenda (.30); revise and distribute amended agenda (.40).	2.80
11/17/03 S. Christenholz	Office conference with M. Berkoff, J. Duban, W. Choslovsky re: omnibus hearing (1.0); office conference with N. Taylor re orders for hearing and reviewed same (.5); e-mails and P/cs re: sale of tank farm (.5).	2.00
11/17/03 M. Fenton	Confer with counsel for T&H Grinding regarding agenda and continuing hearing (.20); confer with counsel for Pacesetter regarding agenda and setting matter (.30); memo from counsel for Mazur regarding agenda item (.10); memo to B. Karpuk regarding same (.10); confer with W. Choslovsky regarding Pacesetter issue and try to resolve (.30).	1.00
11/17/03 J. Duban	Meeting regarding agenda items and handling thereof, and confer regarding Safety Today issues (.90); confer M. Fenton regarding my handling of seventh omnibus claim objection and responses thereto (.40).	1.30

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11/17/03 M. Berkoff	Prepare for November 18 omnibus hearing (.80); office conference with S. Christenholz, W. Campbell and J. Duban in preparation for 33 item agenda; allocate responsibilities (1.10); office conferences with W. Campbell and N. Taylor re: amended agenda (.20); review amended agenda (.10).	2.20
11/17/03 N. Taylor	Conference re: agenda and hearing (.6); amend agenda (.3); coordinate filing and service of same (.3); draft orders for hearing and assemble same (5.2); conferences with Mark Berkoff, Janice Duban, Marc Fenton, Steve Christenholz, William Choslovsky re: orders (.6).	7.00
11/17/03 C. McManus	Reviewed client's and colleagues' emails re NKK fees and settlement (.20)	.20
11/18/03 W. Choslovsky	Prepare for and attend National Steel omnibus hearing before Judge Squires (2.10); sent e-mail to client contacts summarizing hearing (.60); contact opposing counsel re: matters handled at hearing (.40).	3.10
11/18/03 S. Christenholz	Office conference with M. Berkoff re hearing results (.3).	.30
11/18/03 S. Christenholz	Prepared for and appeared at hearing.	3.60

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National Steel Corporation  
Invoice # 1460242

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11/18/03 M. Berkoff	Office conferences with S. Christenholz and W. Campbell re: outcome of court (.30); exchange emails with R. Smolev re: NKK payment (.20); exchange emails with Marubeni counsel (.20).	.70
11/18/03 N. Taylor	Conference with William Choslovsky and Steve Christenholz re: hearing (.1); send specific orders to K. Sobecki (.3).	.40
11/19/03 N. Taylor	Send orders to K. Sobecki (.3); e-mail from K. Sobecki re: same (.1); review e-mails re: liens (.2);	.60
11/20/03 M. Berkoff	Review Huber settlement documents.	.40
11/21/03 S. Christenholz	Reviewed open matters (.5)	.50
11/21/03 M. Berkoff	Attention to NKK escrow (.10); teleconference with S. Christenholz re: Wierton (.10); review correspondence from Marvin Little (creditor who sent correspondence to court that was forwarded to my attention ) (.20).	.40
11/21/03 N. Taylor	Coordinate assembly of orders (.2); draft letters enclosing orders entered at Omnibus Hearing (2.6).	2.80
11/23/03 M. Berkoff	Review emails.	.60
11/24/03 M. Berkoff	Review emails re: mechanics lien and tax claims (.30); organize files (.40); review Huber settlement file (.30).	1.00

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11/28/03 W. Choslovsky	Begin preparing agenda for 12/9 omnibus hearing, including reading and summarizing pleadings.	2.40
11/30/03 M. Berkoff	Prepare for December 1 board call (.30); review emails (.40) and new motions to compel payment of alleged administrative claims (.80). Also, begin preparation for December 19 Omnibus hearing (.70).	2.20

Total Hours 67.70

Total Fees \$20,922.00

## T I M E K E E P E R S U M M A R Y

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>FEEs</u>
M. Berkoff	Partner	13.30	475.00	6,317.50
J. Duban	Partner	1.30	400.00	520.00
M. Fenton	Of Counsel	3.80	390.00	1,482.00
C. McManus	Associate	2.40	325.00	780.00
S. Christenholz	Associate	9.40	325.00	3,055.00
W. Choslovsky	Associate	14.70	325.00	4,777.50
N. Taylor	Paralegal	22.80	175.00	3,990.00
		=====		=====
TOTALS		67.70		20,922.00

Total Fees and Disbursements \$20,922.00

Total Matter Current Balance \$20,922.00

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National Steel Corporation  
Attn: Ron Werhnyak  
4100 Edison Lakes Parkway  
Mishawaka, IN 46545

December 31, 2003  
Invoice # 1460243

**Matter Number:** 306073-000007

**Matter Name:** Claims Administration and Objections

For Legal Services Rendered Through November 30, 2003

For National Steel Corporation

		<u>Hours</u>
11/03/03 S. Christenholz	Office conferences with N. Taylor and M. Fenton re objections and emails re same (.5)	.50
11/03/03 M. Berkoff	Review various e-mails from Bob Foley re: claims data.	.40
11/03/03 N. Taylor	Multiple conferences with Marc Fenton re: claim review (.6); Conference with Marc Fenton and L. Stampone re: remaining claims (.3); review exhibits from Logan (.6); reformat exhibit sent in excel (.4); conference with Marc Fenton and Steve Christenholz re: rejected contracts and UMWA agreement relating to claims review (.2); coordinate delivery of claims to chambers (.3)	2.40
11/03/03 A. Zirn	E-mails with T. Michael, D. Gutfeld and S. Christenholz regarding follow up/Texas tax issue.	.20
11/03/03 A. Derby	Create exhibits to order for seventh omnibus claim objection (1.30); and obtain from Logan's web site copies of claims reflected in seventh omnibus claim objection for court (1.0).	2.30

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Page 2

11/04/03 W. Choslovsky	Confer with M. Fenton re: claims' objections and overlay of same with mechanics liens; investigate same and prepare chart for M. Fenton.	.60
11/04/03 S. Christenholz	Office conference with M. Fenton re claims objections (.2); reviewed files re rejected contracts (.3); phone conference with E. Kaup re same (.2)	.70
11/04/03 M. Berkoff	Review e-mails from B. Foley (.20).	.20
11/04/03 N. Taylor	Conferences with Marc Fenton (.3); call to R. Foley re: claims analysis (.2); call to L. Stampone re: pending claims and objections (.2); review of report with Marc Fenton (.2); e-mail to L. Stampone requesting exhibits (.2); review docket (.2); print exhibits (.2); further conferences with Marc Fenton (.2); e-mail to R. Foley enclosing reports (.2); additional call to L. Stampone re: objection and reports (.3).	2.20
11/04/03 D. Gutfeld	Correspondence with various parties (John Burns, T. Briganti, Kirk Sobecki) regarding responses to interrogatories (.7); revise responses; prepare correspondence to S. Christenholz and J. Duban regarding same (.3); prepare correspondence to J. Murch regarding timing for responses (.3); conference with S. Christenholz regarding same (.3)	1.60

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11/05/03 N. Taylor	Multiple conferences and e-mails to/from L. Stampone re: exhibits for claim objection (.7); multiple conferences with Marc Fenton re: same (.3); review exhibits and claims (1.1); review e-mails from R. Foley (.2); send changes to exhibits to L. Stampone (.2); coordinate obtaining copies of claims (.2).	2.70
11/05/03 D. Gutfeld	Finalize responses to interrogatories (1.2); telephone conference with T. Briganti re: same (.4); office conference with S. Christenholz re: same (.5); prepare correspondence to J. Murch re: same; conference with J. Burke re: same (.2).	2.30
11/06/03 M. Berkoff	Review emails and pleadings re: omnibus objection to claims (.60); office conference with M. Fenton re: same (.20); office conference with C. McManus re: order on NKK 9019 motion (.20). Also, field calls from creditors listed on omnibus claim objection (.60).	1.60
11/06/03 N. Taylor	Call to Logan re: serving of claim objection (.2); send service lists (.2); calls and e-mails to/from L. Stampone re: exhibits (.7); conferences with Marc Fenton re: objection and exhibits (.2); draft objection (1.8); review exhibits (.3); e-mail to Debtor re: exhibit (.2).	3.60



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11/07/03 M. Berkoff	Office conference with M. Fenton re: next steps (.20); review correspondence and emails re: claims (.40).	.60
11/07/03 N. Taylor	Review of exhibits (.4); e-mails and calls to/from Logan re: exhibits and service of motion (.8); review and revise objection (.7); assemble and coordinate filing and service of same objection (.5); conferences with Marc Fenton re: same (.2).	2.60
11/07/03 A. Zirn	Teleconference with R. Gallup regarding paid taxes claims chart (.5); teleconference with R. Gallup regarding MN real estate taxes (.1); e-mail to M. Fenton regarding same (.2).	.80
11/10/03 M. Berkoff	Exchange emails re: NKK/DNN; review fax from NKK re: same (.40).	.40
11/10/03 D. Missner	Review responses to objections to claims; telephone conferences with attorneys; conference with Choslovsky re facts & strategies	.50
11/10/03 N. Taylor	Conferences with Marc Fenton re: order for seventh omnibus claim objection and responses to eighth omnibus claim objection.	.20
11/10/03 D. Gutfeld	Review fax correspondence and pleadings re: Safety Today discovery and response to application (1.2); conference with S. Christenholz, J. Burke and J. Schuch re: same (.5).	1.70

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11/11/03 M. Berkoff	Review emails re: NKK/DNN motion (.30); teleconference with R. Smolev (.10); revise order (.30); office conference with C. McManus re: foregoing (.20); review DNN/NKK invoice over administrative fee billing discrepancy (.30).	1.20
11/11/03 D. Missner	Work on mechanic's lien claims objections; review answers thereto and Choslovsky's chart re same	.40
11/11/03 N. Taylor	Conference with Marc Fenton re: responses to omnibus objections.	.20
11/12/03 W. Choslovsky	Calls to/from Dean Gramlich re: Hayes Lammerz motion for administrative claim; review and research same.	.50
11/12/03 S. Christenholz	Office conference with M. Fenton re claim objections (.2)	.20
11/12/03 M. Berkoff	Revise draft JFE order and transmit same to S. Towbin (.40); office conference with S. Christenholz re: new issue re: payment of administrative fee (.30); teleconference from S. Towbin re: JFE Order, Lazard and related issues (.30). Also, review pleadings re: Safety Today and discuss same with J. Burke (.20).	1.20
11/12/03 D. Missner	Prepare with Choslovsky for conference call with Sobacki and McDonough re analysis of mechanic's lien claims	.60

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11/12/03 D. Gutfeld	Correspondence with J. Schuch regarding contact information for discovery requests (.2); conference with J. Schuch regarding outstanding discovery issues (.9); conference with S. Christenholz regarding same (.3)	1.40
11/13/03 M. Fenton	Review memo from attorney Chervokas responding to objection regarding Mizuho claim (.20); confer with counsel regarding same (.30); confer with N. Taylor regarding responding to counsel to rectify claim objection (.20).	.70
11/13/03 M. Berkoff	Review emails re: NKK/JFE (.30); teleconference with R. Smolev re: same (.10); teleconference with M. Fischer re: same (.20).	.60
11/13/03 D. Gutfeld	Correspondence with J. Schuch regarding various discovery issues (.5); correspondence with S. Christenholz regarding same (.3); prepare correspondence to J. Burke regarding same. (.2)	1.00
11/14/03 M. Fenton	Review claims reconciliation on various claims forwarded from B. Foley (.70); claims analysis to prepare substantive objections (.80); confer with attorney Nathan for U.S. Dept. of Justice regarding objection (.20).	1.70
11/14/03 M. Berkoff	Exchange emails re: DNN/Dofasco.	.30

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11/14/03 D. Gutfeld	Correspondence with S. Christenholz and J. Schuch regarding document production (Safety Today) (.4); correspondence with P. Brennan regarding same (.2)	.60
11/17/03 M. Fenton	Confer with Texas attorney general's office regarding objection to claim (.20); confer with D. Zazove regarding issues related to claim objection (.20); confer with counsel for Cagna to resolve claim objection (.20); two conferences with attorney Nathan for U.S. Customs regarding resolving claim objection (.40); review proposed order from attorney Nathan regarding same (.10); review and revise order for 7th Omnibus claims objection (.30); confer with N. Taylor regarding order and pending objections (.30); confer with J. Duban regarding same to prepare her for hearing (.30); review six claim reconciliations from B. Foley (.60).	2.60
11/17/03 M. Berkoff	Teleconference with D. Zazove re: administrative fee at Dofasco (.10); review emails re: same (.30); teleconferences and emails with R. Smolev, S. Towbin, C. Springer, D. Gramlich and D. Zazove re: administrative fee, 9019 Motion and appropriate order (1.10); edit order (.30); office conferences with S. Christenholz re: handling court and presenting motion (.30).	2.10

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11/17/03 M. Berkoff	Review numerous emails from B. Foley re: claims data/reconciliation (.60); field calls from creditors in receipt of Eighth Omnibus Objection (.40); review Eighth Omnibus Objection (.30).	1.30
11/17/03 M. Berkoff	Office conferences with S. Christenholz re: Safety Today (.30); implement strategy (.20).	.50
11/17/03 D. Gutfeld	(Safety Today) Research regarding waiver of adversary proceeding requirements (1.40); conference with S. Christenholz regarding same (.3); review pleadings regarding Motion to Compel/Motion to Extend Discovery Cut-off (.8).	2.50
11/18/03 M. Fenton	Review reconciliation of twelve claims by B. Foley (.80); conference with J. Sakach to resolve objection to his claim (.20); review memo regarding revising objection regarding Mizuho from attorney Chervokas (.20); discuss same with N. Taylor (.20).	1.40
11/18/03 M. Berkoff	Review numerous emails from B. Foley re: creditor claim data/reconciliation.	.80
11/18/03 D. Missner	Conference with Choslovsky re how to handle remaining claims	.30
11/18/03 D. Gutfeld	Conference with J. Schuch regarding hearing (.2); conference with S. Christenholz regarding hearing and future action (.5); review correspondence regarding settlement (.3)	1.00

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11/18/03 A. Derby	Obtain from Logan's web site copies of claims referenced in eighth omnibus objection for court.	.70
11/19/03 M. Fenton	Review chart summary from W. Choslovsky regarding resolution of mechanics lien claims to see if it resolves proof of claim issues (.30); confer with W. Choslovsky regarding same and need to advise Logan regarding resolution and how to carry pending claims (.30); review three reconciliations from B. Foley (.30).	.90
11/19/03 M. Berkoff	Review emails from B. Foley re: creditors' claims (.30); teleconference with K. Sobacki re: Safety Today, JFE, November 18 Court and miscellaneous estate issues (.30); review correspondence from J. Lien re: Safety Today and draft letter in response (.30).	.90
11/20/03 M. Fenton	Confer with A. Zirn regarding tract searches (.20); discuss same with M. Berkoff (.20).	.40
11/20/03 M. Berkoff	Review Voss settlement agreement and discuss same with S. Christenholz (.30); review motions to compel payment of administrative claims filed by Hayes-Lemmerz and EES Coke (.70); discuss same with S. Christenholz and B. Audette (.10).	1.10

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11/20/03 A. Zirn	Telephone conference with J. McIntosh regarding Minneapolis lien searches (0.2); office conference with M. Fenton regarding same (0.1).	.30
11/21/03 M. Fenton	Meet with W. Choslovsky and A. Zirn regarding lien and tract searches for Minnesota Miners lien (.30); confer with counsel for Mizuho regarding resolving claim (.20); review memo from her confirming same (.10).	.60
11/21/03 M. Berkoff	Teleconference from L. Chervokas (represents Mizuho Global) re: National Steel's Eighth Omnibus Objection to Claims; discuss same with M. Fenton and review confirming email from Leslie C. (.30); review orders entered at November 18 omnibus hearing (.20); review emails from B. Foley (.40); office conference with M. Fenton re: status of objections (.20); teleconference from creditor re: Eighth Omnibus Objection (.30).	1.40
11/21/03 A. Zirn	Office conference with B. Choslovsky regarding how to proceed with lien searches (0.4); review liens regarding same (0.3); telephone conference with J. McIntosh regarding same (0.4) e mail to McIntosh regarding same (0.2).	1.30
11/24/03 A. Zirn	Telephone conference with McIntosh (0.1) regarding searches; telephone conference with Choslovsky regarding same (0.1).	.20

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11/24/03 D. Gutfeld	Conference call with J. Schuch and T. Briganti regarding document production (.7); review documents regarding same (.5)	1.20
11/25/03 M. Berkoff	Review and edit Huber settlement agreement and releases (.60); relay comments to Paul Hourihan (.30).	.90
11/26/03 B. Audette	Review EES Coko Battery motion for allowance of administrative expense claim (.4); Review Hayes Lemerz motion for allowance of administrative expense claim (.3).	.70
Total Hours		61.80
Total Fees		\$19,665.00

## T I M E K E E P E R S U M M A R Y

TIMEKEEPER	TITLE	HOURS	RATE	FEE\$
D. Missner	Partner	1.80	525.00	945.00
M. Berkoff	Partner	15.50	475.00	7,362.50
A. Zirn	Partner	2.80	375.00	1,050.00
M. Fenton	Of Counsel	8.30	390.00	3,237.00
S. Christenholz	Associate	1.40	325.00	455.00
W. Choslovsky	Associate	1.10	325.00	357.50
D. Gutfeld	Associate	13.30	260.00	3,458.00
B. Audette	Associate	.70	225.00	157.50
N. Taylor	Paralegal	13.90	175.00	2,432.50
A. Derby	Project Assist.	3.00	70.00	210.00
TOTALS		61.80		19,665.00

Total Fees and Disbursements \$19,665.00

Total Matter Current Balance \$19,665.00



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National Steel Corporation  
Attn: Ron Werhnyak  
4100 Edison Lakes Parkway  
Mishawaka, IN 46545

December 31, 2003  
Invoice # 1460244

**Matter Number:** 306073-000008

**Matter Name:** Consignment/Reclamation/Trust/Fund  
Claims

For Legal Services Rendered Through November 30, 2003

For National Steel Corporation

		<u>Hours</u>
11/03/03 J. Duban	Contemplate substance and form of orders regarding reclamation report, and review templates from other cases (.50); e-mails regarding Midwest Instrument and factual defenses (.30); e-mail J. Teibel regarding Cutting Edge negotiations (.20); communications with counsel for Magneco regarding claimants' position and factual defenses thereto (.40); research UCC definition and interpretation of "receipt" of goods and e-mail K. Sobecki re: same (1.10).	2.50
11/04/03 J. Duban	Additional e-mails K. Sobecki regarding Midwest Instrument "receipt" fax and commence letter to claimant's counsel (.60); work with A. Derby regarding locating proofs of claim for reclamation creditors for treatment in ultimate orders entered (.50); re: Global Titanium, receive and review lengthy letter from claimant's attorney regarding claimant's position and forward to client for comment on consumption issue (.50); e-mails K. Sobecki and telephone conferences with	1.90

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counsel for Wabash Aluminum  
regarding contentions re:  
reclamation report and settlement  
authority (.30).

11/05/03 J. Duban	Re: ME Glogal, examination of file documents, claimants' position and e-mail K. Sobecki re: same and claimants' position (.40); telephone conference Midwest Instrument attorney regarding Debtors' position on "receipt" of goods and consumption (.30); telephone call from counsel for Big Rivers Inc. regarding claimants' position and lengthy e-mail K. Sobecki regarding issues (.60).	1.30
11/06/03 J. Duban	Review notes and K. Sobecki e-mails regarding open matters (.20); several e-mails and annotation review regarding Big Rivers Inc. and Pasminco Zinc (.40); telephone calls and e-mails counsel for Big River and K. Sobecki regarding alleged non-receipt of post-petition amounts (.40); lengthy conference counsel for Wabash Aluminum regarding fractionalization of petition date for reclamation purposes and alleged petition date reclamation due (.40); research regarding same (.50); confer S. Christenholz regarding actual time of case filing (.10); e-mails Wabash counsel and K. Sobecki regarding Bethlehem allegations and proof of delivery in Bethlehem, and evaluate date comparisons regarding demand date in each case (.70).	2.70

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11/07/03 J. Duban	Telephone conferences with, and e-mails to, counsel for Magneco regarding support for delivery within reclamation period (.40); telephone call from and e-mail to counsel for Global Titanium regarding adjournment agreement for November 18 (.30); telephone call from and e-mail to counsel for Baring headquarters regarding same, and alleged defenses to omnibus objection (.40); telephone call from and e-mail to counsel for Big Rivers Inc. regarding adjournment of November 18 hearing (.30); receive and forward to K. Sobecki proof of delivery on Bethlehem claim requested from Wabash Aluminum, and briefly review same (.20); telephone calls and e-mails D. Furr, counsel for ME Global, regarding settlement and adjournment of November 18 hearing (.30).	1.90
11/08/03 J. Duban	Review all objections to omnibus objection, including motions in adversary proceedings, in preparation for drafting appropriate orders for November 18 hearing, and report status of all objections to M. Berkoff (1.40); e-mails from and to counsel for Amalgamet (.20); e-mail S. Christenholz regarding assertions concerning reclamation in debtors' schedules (.20); dictate answer to T&H Grinding amended complaint (.70).	2.50

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11/10/03 J. Duban

E-mails K. Sobecki regarding ME Global and Bearing headquarters (.20); e mails K. Sobecki regarding effective consumption prior to receipt of reclamation demand (.20); several e-mails K. Sobecki regarding Wabash Aluminum and analyze issue (.30); several e-mails Wabash counsel regarding debtors' position (.30); e-mails and telephone conference with attorney for Western Lime regarding settlement (.40); Re: Weldmet, lengthy telephone call from attorney for claimant, e-mails K. Sobecki and to Weldmet attorney, and commence drafting position letter to Weldmet attorney (.80); e-mails from and to counsel for Xtec regarding proposed order (.20); telephone call from counsel for Phoenixx re: intent and effect of omnibus objection with respect to paid claim (.30).

2.70

11/11/03 J. Duban

E-mails K. Sobecki re: Wabash Aluminum and Big River factual defenses (.30); several communications K. Sobecki and counsel for ESM regarding response and extensive analysis of consumption defense, including negotiations over adjournment of November 18 hearing and e-mail regarding debtors' position (1.20); several communications, including two telephone conversations and several e-mails Bearing headquarters attorney regarding debtors' positions on

3.90

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consumption (.40); e-mails K. Sobecki and in-house re: DA Stuart response to omnibus objection and authority for no offer (.40); e-mails K. Sobecki and counsel regarding Global Titanium settlement and Weldmet defense issues (.30); complete lengthy communication Weldmet counsel concerning debtors' position (.40); receive, review and communications with K. Sobecki regarding Mississippi Lime response (.30); communications Mississippi Lime counsel regarding adjournment (.20); review and revise answer to T&H Grinding Amended Complaint, and arrange for filing and service (.40).

11/11/03 A. Derby	Review court docket for objections filed to omnibus objection to reclamation claims, for J. Duban.	.20
11/12/03 J. Duban	Several e-mails and telephone conferences with counsel and K. Sobecki regarding Refractory Service objection and response thereto, and need for supporting documentation (.70); telephone calls and e-mails counsel for Big River Zinc regarding settlement and counter offer (.40); same regarding Weldmet (.30).	1.40
11/12/03 A. Derby	Review court docket for responses filed to omnibus objection to reclamation claims.	.10

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11/13/03 J. Duban

Confer W. Choslovsky and N. Taylor 3.20  
regarding agenda for omnibus, and  
e-mails relating to text therefor  
relating to reclamation (.40);  
e-mails and telephone conferences  
with counsel for Weldmet  
concerning claim objection,  
response and settlement (.60);  
e-mails relating to Mississippi  
Lime defenses (.30); e-mails and  
telephone conference with A. Curry  
regarding Wabash Aluminum (.30);  
e-mails and telephone conferences  
with client and counsel for  
Refractory Service regarding  
response (.40); e-mails client and  
N. Kahn regarding Global Titanium  
settlement (.30); e-mails client  
and N. Kahn regarding TriStar  
Steel (.20); conferences J. Schuch  
regarding Safety Today issues  
(.40); several e-mails and  
examinations of docket to locate  
all omnibus objection responses  
(.30).

11/17/03 J. Duban

Review docket several times in 6.90  
effort to capture late-filed  
responses to omnibus reclamation  
objection (.40); e-mails and  
telephone conferences regarding  
TriStar Steel, and settlement  
(.30); e-mails and telephone  
conferences regarding Mississippi  
Lime, and settlement (.20);  
e-mails and telephone conferences  
regarding Western Lime, and  
settlement (.60); e-mails and  
telephone conferences regarding  
Big River Zinc (.70); e-mails and  
telephone conferences regarding

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National Steel Corporation  
Invoice # 1460244

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Ziegler, settlement, and confer W. Choslovsky regarding discrepancy between stipulation and reclamation order (.40); e-mails and telephone conferences regarding Global Titanium, and settlement (.30); e-mails and telephone conferences regarding ME Global, and settlement (.40); several conferences J. Burke, S. Christenholz and M. Berkoff regarding Safety Today (.50); conference K. Sobecki regarding all responses, and annotate files accordingly (.40); review Rockwell Lime and Phoenix International Files (.40); complete, review and revise and finalize proposed order for presentation to Judge Squires (1.70); directions A. Derby regarding revisions to exhibit A to order, and review same (.60).

11/17/03 A. Derby	Review court docket for responses to omnibus objection to reclamation claims.	.10
11/17/03 A. Derby	Draft exhibit to order for omnibus objection to reclamation claims.	.80
11/18/03 J. Duban	Court appearance for omnibus hearing and handling of several agenda items (1.30); e-mails K. Sobecki regarding conference on status of all reclamation matters (.20); letters circulating orders on first omnibus objection to reclamation and T&H Grinding complaint and contemplate scope of service (.40); e-mails K. Sobecki regarding order and Global Titanium settlement (.20).	2.10

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11/19/03 J. Duban	T/c K. Sobecki scheduling e-mails and analysis of status of all objections, and according annotations of file, in preparation for conference with K. Sobecki on November 20 (2.80); in connection therewith, e-mails/and/or telephone calls with following objectors regarding status of responses, settlement offers and counter offers: ESM, Magneco, Midwest Instrument, Refractory Service, T&H Grinding (letter), TriStar, Wabash and Mississippi Lime (1.90).	4.70
11/19/03 A. Derby	Review court docket and claim agent web site with regard to possible claims of RHI Refractories.	.20
11/20/03 J. Duban	Telephone conference K. Sobecki regarding all pending responses/objections and resolution thereof, and follow up e-mails concerning Weldmet, Rexel United and Rule 9024 (1.20); confer J. Schuch and S. Christenholz regarding "response" to Safety Today application prior and subsequent to research on requirement to file any response (.70).	1.90
11/21/03 J. Duban	Obtain and review, and forward to K. Sobecki, supplemental order on omnibus objection of Bethlehem Steel (.20); commence drafting supplemental order for December 9 (.30).	.50



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11/22/03 A. Derby	Draft supplemental exhibit to order disallowing reclamation claims.	.30
11/23/03 J. Duban	Commence drafting supplemental order on First Omnibus Reclamation Objection (1.40); compose e-mail to Logan regarding reduction/reclassification/disallowance of claims subject to order on First Omnibus Reclamation Motion (.30); draft Second Omnibus Reclamation Motion (.90); contemplate vacature/amendment to First Reclamation Order with respect to creditors who did not receive motion (.30).	2.90
11/24/03 J. Duban	E-mails and analyze Weldmet claim and defenses, and lengthy e-mail counsel with counter settlement proposal (.70); e-mails K. Sobecki and commence analysis of consumption issue on Big River Zinc in preparation for making counter settlement proposal (.40); e-mails and arrange for transmittal of November 18 order, D. Gramlich (.30).	1.40
11/25/03 J. Duban	Numerous e-mails and telephone conferences with client and counsel for claimants' Natco and Vail Rubber regarding vacature of November 18 order, consumption and service issues and settlement negotiations (1.20); e-mails to and from L. Stampone regarding delay in effect of November 18 order on Natco and Vail (.30); e-mails from and to counsel for Grinding Systems regarding	1.80

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effective date of plan and payment  
of reclamation (.30).

11/26/03 J. Duban	Preliminary conference counsel with TriStar regarding counter settlement offer and lack of identification of goods on demand date (.30); e-mails from and to Jasper Engineering regarding disallowance of claim (.20); e mails from and to counsel for ESM regarding delay in settlement negotiations (.20); telephone call and e-mail from counsel for Western Lime and commence reviewing proposed stipulation on settlement (.40).	1.10
11/28/03 J. Duban	Big River, study K. Sobcecki e-mail regarding consumption and Kraft counter settlement proposal to attorneys for Big River Zinc (.60); lengthy conference counsel for Vail Rubber regarding vacature of November 18 order and settlement alternative, including discussion of burden of proof and factual defenses to reclamation claim (.50); regarding Western Lime, review proposed stipulation resolving administrative claim motion by reclamation claimant, incorporate substantive and satisfactory provisions in proposed supplemental order on reclamation, and e-mail Western Lime counsel regarding same (.80).	1.90
Total Hours		50.90
Total Fees		\$19,799.00

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## T I M E K E E P E R S U M M A R Y

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>FEE\$</u>
J. Duban	Partner	49.20	400.00	19,680.00
A. Derby	Project Assist.	1.70	70.00	119.00
		=====		=====
TOTALS		50.90		19,799.00

Total Fees and Disbursements \$19,799.00

Total Matter Current Balance \$19,799.00

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National Steel Corporation  
Attn: Ron Werhnyak  
4100 Edison Lakes Parkway  
Mishawaka, IN 46545

December 31, 2003  
Invoice # 1460245

**Matter Number:** 306073-000018

**Matter Name:** Litigation (General)

For Legal Services Rendered Through November 30, 2003

For National Steel Corporation

		<u>Hours</u>
11/06/03 W. Choslovsky	Calls to/from Jerry Lutkus at Barnes & Thornburg re: McDonald sexual harassment suit; e-mail to K. Sobacki re: same (.70); read memo by Paul Hourihan on Richard Wood appellate issues (.50).	1.20
11/11/03 W. Choslovsky	Calls to/from Brian Riley, National Steel's local counsel in McDowell case in Ohio, re: status of bankruptcy and effect of stay.	.50
Total Hours		1.70
Total Fees		\$552.50

## T I M E K E E P E R S U M M A R Y

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>FEEs</u>
W. Choslovsky	Associate	1.70	325.00	552.50
		=====		=====
TOTALS		1.70		552.50

Total Fees and Disbursements \$552.50

Total Matter Current Balance \$552.50

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National Steel Corporation  
Attn: Ron Werhnyak  
4100 Edison Lakes Parkway  
Mishawaka, IN 46545

December 31, 2003  
Invoice # 1460246

**Matter Number: 306073-000025**

**Matter Name: Reorganization Plan**

For Legal Services Rendered Through November 30, 2003

For National Steel Corporation

		<u>Hours</u>
11/03/03 M. Fenton	Review memo regarding Culver's mechanics lien (.20); review their response to motion (.20); confer with Logan regarding objections and new summaries (.30); review various memos from B. Foley regarding resolutions to certain claims (.20); confer with E. Kaup regarding PBGC claims and employee claims (.20); confer with N. Taylor regarding new reports from Logan and content (.50); review and analysis of Logan reports (3.80).	5.40
11/04/03 M. Fenton	Review series of e-mail memos from B. Foley regarding his reconciliation of various claims (.50); confer with attorney Nathan to discuss resolution of government claims (.20); analysis of series of Logan reports (4.70); confer with N. Taylor regarding filing eighth Omnibus objection (.50); review and analysis for eighth Omnibus objection (.40); confer with W. Choslovsky regarding Miners mechanics lien claim resolutions (.20).	6.50

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Invoice # 1460246

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11/05/03 M. Fenton	Confer with N. Taylor regarding exhibits for 8th Omnibus objection and revisions to same (.60); review memos from B. Foley regarding reconciliation of pending claims (.40); continued analysis of reports from Logan to prepare claim objections (2.80); review Plan and confirmation order to determine how to deal with claims filed by PBGC and inter-company claims (.80).	4.60
11/06/03 W. Choslovsky	Calls to/from Gail Barton, lawyer for Soil Material Engineering, re: Soil's unsecured claim.	.20
11/06/03 M. Fenton	Confer with E. Kaup regarding Baker's Port claim settlement (.20); confer with N. Taylor regarding preparing 8th Omnibus objection (.50); continued claims analysis to object to same on substantive basis (5.50).	6.20
11/06/03 M. Berkoff	Review revised version of the NKK Litigation Trust Agreement.	.80
11/07/03 M. Fenton	Review revisions by client to claim objections (.20); conference with N. Taylor re: same (.20); redraft and revise 8th Omnibus claims objection (1.00); conference with attorney Geekie for Baker's Port re: objection to claim (.20); draft letter to attorney Hazelwood for Baker's Port regarding objection (.20); continued claims analysis to object to claims (4.50);	6.50

National Steel Corporation  
Invoice # 1460246

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conference with counsel for Carbon Processing to resolve claim objection (.20).

11/10/03 M. Fenton                      Review memo from Icon responding to mechanics lien objection and discuss same with W. Choslovsky (.30); confer with N. Taylor regarding drafting order for 7th Omnibus objection (.20); calls from two creditors regarding reasons for objections to their claims (.20).                      .70

11/11/03 M. Fenton                      Review U.S. Attorney response to objection to customs claim (.20); review response of Cagna to claim objection (.20); confer with Canadian creditor regarding status (.20); confer with counsel for EES regarding claim objection (.20); confer with counsel for Mazur regarding objection and filing response (.20); confer with N. Taylor regarding clarifying order on 7th objection to resolve various responses to objections (.30); review Drilling Services response regarding Mechanics Lien issue (.30); continued claims analysis to prepare written objections (2.30).                      3.90

11/12/03 M. Fenton                      Review US Steel asset purchase agreement to see which creditors were paid and which claims can be resolved (2.40); confer with W. Choslovsky regarding administrative claims request from Hayes-Lemmerz (.10); confer with Metro Sanitary District regarding claim objection and response (.20); discuss same with S.                      2.90

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	Christenholz (.20).	
11/24/03 J. Burke	Attention to discovery responses from client.	.30
11/25/03 M. Berkoff	Conference call with K. Sobacki and E. McDonough to discuss JFE escrow and post-confirmation issues (.30); discuss same with E. Kaup (.00); review confirmation order for deadlines (.40).	.70
Total Hours		38.70
Total Fees		\$15,210.50

### T I M E K E E P E R S U M M A R Y

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>FEEES</u>
M. Berkoff	Partner	1.50	475.00	712.50
J. Burke	Partner	.30	400.00	120.00
M. Fenton	Of Counsel	36.70	390.00	14,313.00
W. Choslovsky	Associate	.20	325.00	65.00
		=====		=====
TOTALS		38.70		15,210.50

Total Fees and Disbursements	\$15,210.50
Total Matter Current Balance	<u>\$15,210.50</u>



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National Steel Corporation  
Attn: Ron Werhmyak  
4100 Edison Lakes Parkway  
Mishawaka, IN 46545

December 31, 2003  
Invoice # 1460247

**Matter Number:** 306073-000026

**Matter Name:** Reports and Schedules

For Legal Services Rendered Through November 30, 2003

For National Steel Corporation

		<u>Hours</u>
11/21/03 M. Berkoff	Review October 2003 Operating Report; discuss filing of same with N. Taylor.	.30
11/21/03 N. Taylor	Coordinate filing and service of monthly operating report (.3); brief conference with Mark Berkoff re: same (.1).	.40
Total Hours		.70
Total Fees		\$212.50

## T I M E K E E P E R S U M M A R Y

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>FEES</u>
M. Berkoff	Partner	.30	475.00	142.50
N. Taylor	Paralegal	.40	175.00	70.00
		=====		=====
TOTALS		.70		212.50

Total Fees and Disbursements \$212.50

Total Matter Current Balance \$212.50

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Fed ID #52-0616490

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National Steel Corporation  
Attn: Ron Werhnyak  
4100 Edison Lakes Parkway  
Mishawaka, IN 46545

December 31, 2003  
Invoice # 1460248

**Matter Number:** 306073-000027

**Matter Name:** Retention / Fee Matters (Piper Rudnick)

For Legal Services Rendered Through November 30, 2003

For National Steel Corporation

		<u>Hours</u>
11/07/03 N. Taylor	Brief Conference with Mark Berkoff re: quarterly application (.1); review of order re: same (.2)	.30
11/11/03 M. Berkoff	Begin to review and edit October pre-bill.	.60
11/19/03 M. Berkoff	Begin to review and edit October pre-bill.	.70
11/23/03 M. Berkoff	Review and edit October pre-bill.	2.30
11/24/03 N. Taylor	Begin initial preparation of monthly fee submission (.4); conferences with accounting re: proforma (.2).	.60
11/25/03 N. Taylor	Review/revise proforma (.8); conferences with accounting re: same (.3) draft fee application and exhibits thereto (2.0); review/revise notice (.4); conferences with Mark Berkoff re: same (.1).	3.60
	Total Hours	8.10
	Total Fees	\$2,497.50