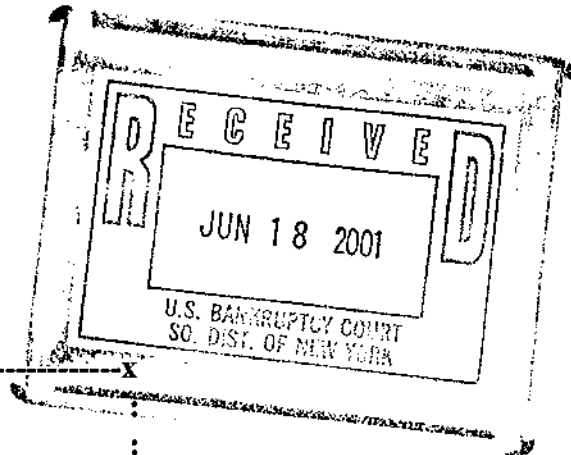


Jerold S. Solovy  
Daniel Lynch  
Jenner & Block  
One IBM Plaza  
Chicago, IL 60611  
(312) 222-9350

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**



In re :  
: **Chapter 11 Cases Nos.**  
: **01-40252 (AJG) through**  
: **01-40290 (AJG)**  
: **(Jointly Administered)**  
: **Debtors.**

**FIRST APPLICATION OF JENNER & BLOCK, LLC, ATTORNEYS EMPLOYED BY  
DEBTORS IN THE ORDINARY COURSE OF BUSINESS, FOR ALLOWANCE OF  
INTERIM COMPENSATION FOR SERVICES RENDERED AND EXPENSES  
ADVANCED FROM FEBRUARY 6, 2001 THROUGH APRIL 30, 2001**

TO THE HONORABLE ARTHUR J. GONZALEZ,  
UNITED STATES BANKRUPTCY JUDGE:

Jenner & Block, LLC ("Jenner & Block"), attorneys employed by debtors in the ordinary course of business, submits for its formal application ("the Application"), pursuant to sections 330(a) and 331 of title 11 of the United States Code (the "Bankruptcy Code"), for the allowance of interim compensation for professional services rendered and reimbursement of expenses advanced, and, in support thereof, respectfully states:

### **Jurisdiction and Venue**

1. This Court has jurisdiction to consider the Application pursuant to 28 U.S.C. §§ 157 and 1334, and the Standing Order of Referral of Cases to Bankruptcy Court Judges of the District Court for the Southern District of New York, dated July 10, 1984 (Ward, Acting C.J.). Consideration of the Application is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

### **Summary of Application**

2. On February 6, 2001, The Coleman Company, Sunbeam HSC, Sunbeam Products and First Alert and certain other subsidiaries of Sunbeam Corporation (collectively the “Debtors”) all filed voluntary chapter 11 bankruptcy petitions in this Court. On that same day, the Court entered an order for the joint administration of the Debtors’ chapter 11 bankruptcies. The Court also entered an order on February 6, 2001, pursuant to sections 327 and 328 of the Bankruptcy Code, authorizing the Debtors to employ professionals, including Jenner & Block, to perform necessary and appropriate work in the ordinary course of the Debtors’ businesses. This is Jenner & Block’s first application for allowance of interim compensation for services rendered and for reimbursement of expenses.

3. Between February 6, 2001 and April 30, 2001 (the “Compensation Period”), Jenner & Block expended time and advanced expenses for the following Debtors: The Coleman Company, Inc. (“The Coleman Company”), Sunbeam Health & Safety Company (“Sunbeam HSC”), Sunbeam Products, Inc. (“Sunbeam Products”), and First Alert, Inc. (“First Alert”). During the Compensation Period, Jenner & Block represented these four debtors in five separate matters involving appellate and trial court work in five different courts. Approximately

two-thirds of Jenner & Block's time during the Compensation Period relates to the successful defense of a trade secrets case in which the plaintiff sought an emergency TRO against Sunbeam HSC and Sunbeam Products. The majority of Jenner & Block's remaining time related to the representation of The Coleman Company before the United States Supreme Court in a case involving novel legal issues as to which there is a split in authority in the federal appellate courts.

4. Jenner & Block expended time and advanced expenses for the following five matters during the Compensation Period: (1) *Brown v. The Coleman Company, Inc.*, (2) *Sinclair & Rush, Inc. v. The Coleman Company, Inc.*, (3) *Taylor Precision Products, L.P. v. Pamela Wittenberg, Sunbeam Health & Safety Company, and Sunbeam Products, Inc.*, (4) *Robb v. Guzman, et. al*, and (5) *SEB S.A. v. Sunbeam Corporation and Sunbeam Products, Inc.*

5. Jenner & Block is seeking total fees of \$28,557.50 and reimbursement of total disbursements of \$2,057.42 during the Compensation Period. Jenner & Block's fees are itemized by timekeeper in Exhibit A. Jenner & Block's disbursements are itemized in Exhibit B. Jenner & Block's total fees and expenses are itemized by month and by matter in Exhibit C.

#### Fees

6. Jenner & Block does not wish to burden this Court with an overly detailed or lengthy recitation of each and every matter with respect to which it has rendered services to The Coleman Company, Sunbeam HSC, Sunbeam Products and First Alert. Further, some of the services performed involved confidential matters not of public record. Accordingly, the following is intended to serve only as a summary description of the primary services rendered by Jenner & Block during the Compensation Period.

7. Copies of Jenner & Block's invoices for the services and disbursements discussed in this Application are attached as Exhibits D1-D5. Pursuant to paragraph C of the Administrative Order relating to the Amended Guidelines for Fees and Disbursements in the Southern District of New York Bankruptcy Court, Jenner & Block states that there is a need to omit the redacted information from this Application because it is protected by the attorney-client privilege. Jenner & Block requests that the Court accept redacted versions of the attached invoices in lieu of unredacted versions.

Brown v. The Coleman Company, Inc. Litigation

8. At the time this bankruptcy commenced, Jenner & Block was representing The Coleman Company before the United States Supreme Court in the case of *Brown v. The Coleman Company, Inc.*, S. Ct. No. 00-1501. In that case, The Coleman Company filed a petition for certiorari concerning a decision by the Tenth Circuit Court of Appeals to uphold an arbitration award against The Coleman Company of approximately \$2.3 million for allegedly causing a former employee to exercise his stock options at a less than optimal time. The Coleman Company's petition for certiorari involved novel issues concerning the power of an arbitrator to make an award that is contrary to express contract provisions. There is a split in authority in the federal appellate courts concerning these issues. Jenner & Block expended \$5,727.50 of attorney and paraprofessional time since February 6, 2001 representing The Coleman Company with respect to that petition for certiorari.

Sinclair & Rush, Inc. v. The Coleman Company, Inc.

9. Before this bankruptcy commenced, Jenner & Block defended The Coleman Company in a suit brought by Sinclair & Rush, Inc. in the United States District Court

for the Eastern District of Missouri. The Coleman Company was charged by Sinclair & Rush, Inc. with trade dress infringement. The Coleman Company settled the case by agreeing to a Consent Final Judgment and Permanent Injunction, but in April of this year Sinclair & Rush's attorneys sent a letter to Jenner & Block accusing The Coleman Company of alleged violations of the consent judgment and threatening contempt proceedings. Jenner & Block expended \$1,276.25 of attorney time investigating and responding to these charges on behalf of The Coleman Company.

Taylor Precision Products, L.P. v. Pamela Wittenberg, Sunbeam Health & Safety Company, and Sunbeam Products, Inc. ("Trade Secrets Litigation")

10. In March of this year, Jenner & Block defended Sunbeam HSC, Sunbeam Products, and one of Sunbeam HSC's employees (Pamela Wittenberg) in a trade secrets suit brought by Taylor Precision Products, L.P. ("Taylor") in Du Page County, Illinois Circuit Court. In that case, Taylor sought damages and injunctive relief, including a TRO and preliminary and permanent injunctions that would prevent Sunbeam HSC and Sunbeam Products from employing Wittenberg. Jenner & Block successfully defended against Taylor's motion for a TRO and the case settled shortly thereafter.

11. Jenner & Block expended \$18,926.25 of attorney time representing Sunbeam HSC, Sunbeam Products and Wittenberg with respect to Taylor's lawsuit. Under the extreme time constraints of a TRO proceeding, Jenner & Block investigated the subject matter of the litigation and prepared a response to Taylor's motion for a TRO. In the space of approximately two weeks, Jenner & Block prepared numerous documents, including a memorandum in opposition to Taylor's TRO motion, a motion to dismiss, a motion for expedited

discovery, a motion for substitution of judge, affidavits, a verified answer to the complaint, the final settlement documents and various correspondence. At the same time, Jenner & Block successfully represented the defendants at the hearing on Taylor's TRO motion and negotiated a final settlement of the matter.

Michael Robb v. Guzman, et. al ("Robb Matter")

12. Jenner & Block represents First Alert and Sunbeam Products, who are named as respondents-in-discovery in a wrongful death case. Jenner & Block expended \$105.00 of attorney time concerning this matter.

SEB S.A. v. Sunbeam Corporation and Sunbeam Products, Inc.

13. Jenner & Block represents Sunbeam and Sunbeam Products, Inc. in an intellectual property case brought by SEB S.A. in the United States District Court of New Jersey. The case involves complex issues of fact and law and voluminous discovery. Approximately eighteen thousand pages of documents have been exchanged in discovery and seventeen witnesses have been deposed. Since this bankruptcy began, Jenner & Block has expended \$2,522.50 of time on the case.

**Disbursements**

14. As set forth in Exhibit B, Jenner & Block has disbursed \$989.22 for expenses incurred in providing professional services during the Compensation Period. With respect to photocopying expenses, Jenner & Block charges its clients \$.08 per page. With respect to facsimile expenses, Jenner & Block does not charge for facsimile transmissions, other than the cost of long distance facsimiles at applicable toll charge rates. Each of these categories of expenses does not exceed the maximum rate set by applicable guidelines. These charges are

intended to cover Jenner & Block's direct operating costs, which are not incorporated into Jenner & Block's hourly billing rates. Only clients who actually use services of the types set forth in B are separately charged for such service. The effect of including such expenses as part of the hourly billing rates would impose the cost upon clients who do not require extensive photocopying and other facilities and services. The amount of the standard photocopying charge is intended to allow Jenner & Block to cover the related expenses of its photocopying service. A determination of the actual expense per page for photocopying, however, is dependent on both the volume of copies and the total expenses attributable to photocopying on an annual basis.

15. Due to the nature of The Coleman Company's, Sunbeam HSC's, Sunbeam Product's, and First Alert's businesses, the location of their managements, and the national nature of Jenner & Block's representation, long distance telephone calls have been required. On several occasions, overnight delivery of documents and other materials was required to meet deadlines and address urgent circumstances. These disbursements are not included in Jenner & Block's overhead for the purpose of setting billing rates.

16. Jenner & Block has made every effort to minimize its disbursements in this case. The actual expenses incurred in providing professional services were reasonable, necessary and justifiable under the circumstances to serve the needs of The Coleman Company, Sunbeam HSC, Sunbeam Products and First Alert.

**The Requested Compensation Should Be Allowed**

17. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive requirements of section 330 to govern the Court's award of such compensation. 11 U.S.C. § 331. Section 330 provides that a court may award a

professional with “reasonable compensation for actual services rendered . . . and reimbursement for actual, necessary expenses.” 11 U.S.C. § 330(a)(1). Section 330 further provides:

In determining the amount of reasonable compensation to be awarded, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including--

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and
- (E) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

Id.

18. In the instant case, Jenner & Block respectfully submits that the services for which it seeks compensation were necessary and appropriate and consistently performed in a timely manner commensurate with the complexity, importance, and nature of the issues involved, and approval of the compensation sought herein is warranted.

#### **Statements of Jenner & Block**

19. As set forth in the certification of Daniel Lynch, attached as Exhibit E, the compensation requested by Jenner & Block is based on the customary compensation charged by comparably skilled practitioners in cases other than cases under the Bankruptcy Code.

20. No agreement or understanding exists between Jenner & Block and any other person for a sharing of compensation received or to be received for services rendered by Jenner & Block. Jenner & Block shall not share or agree to share with any other person the



compensation paid or allowed from the estates of The Coleman Company, Sunbeam HSC, Sunbeam Products or First Alert. The foregoing constitutes the statements of Jenner & Block pursuant to section 504 of the Bankruptcy Code and Bankruptcy Rule 2016(a).

21. No agreement or understanding prohibited by 18 U.S.C. § 155 has been or will be made by Jenner & Block.

22. A copy of this Application has previously been provided to Steven R. Isko, Sunbeam Corporation, 2381 Executive Center Drive, Boca Raton, Florida 33431, authorized representative of the Debtors. He has reviewed this Application and approved it.

**Waiver of Memorandum of Law**

23. Pursuant to Local Bankruptcy Rule for the Southern District of New York 9013-1(b), because there are no novel issues of law presented by this Application, Jenner & Block respectfully requests that the Court waive the requirement that Jenner & Block file a memorandum of law to support this Application.

**Notice**


24. Copies of this Application have been given to the Debtors, the United States Trustee, counsel for the Debtors, and counsel for the pre-petition and post-petition lenders.

WHEREFORE, Jenner & Block respectfully requests (i) an interim allowance of compensation for professional services rendered in the amount of \$28,557.50 in fees for the Compensation Period, (ii) reimbursement of actual and necessary disbursements incurred by Jenner & Block in the amount of \$2,075.42, and (iii) such other and further relief as the Court deems just.

Dated: June 15, 2001

Respectfully submitted,

JENNER & BLOCK, LLC

By   
One of Its Attorneys

Jerold S. Solovy  
Daniel Lynch  
JENNER & BLOCK, LLC  
One IBM Plaza  
Chicago, IL 60611  
(312) 222-9350

616531.1

EXHIBIT A

## EXHIBIT A

### Fees

February 6, 2001 through April 30, 2001

<u>Names of Professionals/Paraprofessionals</u>	<u>Year Admitted To Practice</u>	<u>Hourly Rate</u>	<u>Hours Billed</u>	<u>Total For Application</u>
<b>Partners</b>				
Lynch, Daniel	1988	\$375.00	33.5	\$12,562.50
Partners Billing Less than 10 Hours		\$345.00- \$625.00	10	\$4,143.75
<b>Partner Totals</b>			<b>43.5</b>	<b>\$16,706.25</b>
<b>Associates</b>				
Dorkin, Eric	1998	\$205.00	19.5	\$3,997.50
Makarski, David S.	1996	\$245.00	14.25	\$3,491.25
Associates Billing Less than 10 Hours		\$170.00- \$285.00	12	\$2,487.5
<b>Associate Totals</b>			<b>45.75</b>	<b>\$9,976.25</b>
<b>Paraprofessionals And Others</b>				
Eisenstein, Sharyl D.		\$75.00	21.5	\$1,612.50
Paraprofessionals Billing Less than 10 Hours		\$105.00	2.5	\$262.50
<b>Paraprofessional Totals</b>			<b>24</b>	<b>\$1,875.00</b>
<b>TOTAL HOURS:</b>			<b>113.25</b>	
<b>TOTAL FEES DUE:</b>				<b>\$28,557.5</b>

EXHIBIT B

**EXHIBIT B**

**Disbursements**

**February 6, 2001 through April 30, 2001**

<b><u>Disbursements</u></b>	<b><u>Amounts</u></b>
Special Messenger Services	\$346.53
Printing Expense	\$459.70
Photocopy Expense	\$846.28
Telephone	\$1.34
Court Fees	\$117.00
Court Reporter Fees	\$237.40
In-City Transportation	\$13.00
Long Distance Charges	\$54.17
<b>TOTAL DISBURSEMENTS:</b>	<b>\$2,075.42</b>

Exhibit C

**EXHIBIT C**

**Monthly Breakdown of Fees & Disbursements By Matter**

	<b>Brown v. The Coleman Company</b>	<b>Sinclair &amp; Rush, Inc. v. The Coleman Company</b>	<b>Taylor Precision Products, L.P. v. Wittenberg, et. al</b>	<b>Robb v. Guzman, et. al</b>	<b>SEB S.A. v. Sunbeam Corporati on, et. al</b>	<b>TOTAL ALL CASES</b>
<b><u>FEBRUARY 6-28 FEES &amp; EXPENSES:</u></b>						
February 6-28 Fees	\$4,715.00	--	--	\$105.00	\$512.50	\$5,332.50
February 6-28 Expenses	\$28.05	--	--	\$.72	\$21.17	\$49.94
February 6-28 Total Fees & Expenses	\$4,743.05	--	--	\$105.72	\$533.67	\$5,382.44
<b><u>MARCH FEES &amp; EXPENSES:</u></b>						
March Fees	\$772.50	--	\$18,926.25	--	\$1,897.50	\$21,596.25
March Expenses	\$560.39	--	\$374.81	--	\$777.27	\$1,712.47
March Total Fees & Expenses	\$1,332.89	--	\$19,301.06	--	\$2,674.77	\$23,308.72
<b><u>APRIL FEES &amp; EXPENSES:</u></b>						
April Fees	\$240.00	\$1,276.25	--	--	\$112.50	\$1,628.75
April Expenses	\$116.97	\$5.26	--	--	\$190.78	\$313.01
April Total Fees & Expenses	\$356.97	\$1,281.51	--	--	\$303.28	\$1,941.76
<b><u>TOTAL FEES &amp; EXPENSES:</u></b>						
Total Fees	\$5,727.50	\$1,276.25	\$18,926.25	\$105.00	\$2,522.50	\$28,557.50
Total Expenses	\$705.41	\$5.26	\$374.81	\$.72	\$989.22	\$2,075.42
Total Fees & Expenses	\$6,432.91	\$1,281.51	\$19,301.06	\$105.72	\$3,511.72	\$30,632.92



Exhibit D1

LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

CLIENT NUMBER 37490-000  
MATTER NUMBER 10005

THE COLEMAN COMPANY  
625 MADISON AVENUE  
NEW YORK, NEW YORK 10022

MARCH 20, 2001  
INVOICE # 8795719-2

**BROWN V. COLEMAN**

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH FEBRUARY 28, 2001

\$4,715.00

DISBURSEMENTS

28.05

TOTAL INVOICE

\$4,743.05

PRIOR UNPAID INVOICES

Invoice No. 8788672, 1/17/01

13,296.05

Invoice No. 8792122, 2/28/01

8,009.01

**TOTAL AMOUNT DUE**

**\$26,048.11**

LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

THE COLEMAN COMPANY  
625 MADISON AVENUE  
NEW YORK, NEW YORK 10022

INVOICE # 8795719-2

MARCH 20, 2001

CLIENT NUMBER - 37490-000

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH FEBRUARY 28, 2001

BROWN V. COLEMAN

MATTER NUMBER - 10005

2/06/01	PMS	1.25	Edited certiorari reply.	531.25
2/08/01	JTS	2.00	Worked on reply in support of certiorari petition.	770.00
2/09/01	DFL	1.00	Studied draft certiorari petition.	375.00
2/09/01	JZM	1.50	Cite checked Coleman's reply brief.	337.50
2/10/01	JSS	0.50	Worked on certiorari petition and draft reply brief.	312.50
2/11/01	PMS	0.75	Reviewed draft reply brief.	318.75
2/12/01	JSS	0.25	Conferred with J. Shaw re draft reply brief.	156.25
2/12/01	PMS	0.50	Reviewed draft reply; conferred with J. Shaw re filing issues.	212.50
2/12/01	JTS	3.00	Worked on reply brief; conferred with J. Solovy and P. Smith re same.	1,155.00
2/12/01	JZM	0.75	Prepared Coleman's reply brief for filing; telephone calls to printer re same.	168.75
2/26/01	JTS	0.25	Telephone conference with Supreme Court Clerk re denial of certiorari; drafted memorandum re same.	96.25
2/26/01	JZM	0.75	Drafted notice of stay and letter to S. Isko re same.	168.75
2/27/01	JZM	0.50	Telephone call with D. Warta re [REDACTED] and drafted letter to S. Isko re [REDACTED]; reviewed Supreme Court rules for rehearing of denial of certiorari petition.	112.50



**SUMMARY OF PROFESSIONAL SERVICES**

<b>ATTORNEY</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
JEROLD S SOLOVY	0.75	625.00	468.75
PAUL M SMITH	2.50	425.00	1,062.50
JEFFREY T SHAW	5.25	385.00	2,021.25
DANIEL LYNCH	1.00	375.00	375.00
JENNIFER L. MCMANUS	3.50	225.00	787.50
<b>TOTAL</b>	<b>13.00</b>		<b>4,715.00</b>

LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

CLIENT NUMBER 37490-000  
MATTER NUMBER 10005

THE COLEMAN COMPANY  
625 MADISON AVENUE  
NEW YORK, NEW YORK 10022

APRIL 20, 2001  
INVOICE # 8800728

**BROWN V. COLEMAN**

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH MARCH 31, 2001

\$772.50

DISBURSEMENTS

560.39

**TOTAL INVOICE**

\$1,332.89

**PRIOR UNPAID INVOICES**

Invoice No. 8788672, 1/17/01

13,296.05

Invoice No. 8792122, 2/28/01

8,009.01

Invoice No. 8795719-1, 3/20/01

8,385.20

Invoice No. 8795719-2, 3/20/01

4,743.05

**TOTAL AMOUNT DUE**

**\$35,766.20**

LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

THE COLEMAN COMPANY  
625 MADISON AVENUE  
NEW YORK, NEW YORK 10022

INVOICE # 8800728

APRIL 20, 2001

CLIENT NUMBER - 37490-000

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH MARCH 31, 2001

BROWN V. COLEMAN

MATTER NUMBER - 10005

2/27/01	DFL	1.00	Revised a letter re [REDACTED]	375.00
2/28/01	DFL	0.25	Worked on certiorari petition issues.	93.75
3/02/01	MAH	1.25	Worked on indexing and organizing pleadings and correspondence.	131.25
3/27/01	DFL	0.25	Responded to client requests re [REDACTED]	93.75
3/27/01	MAH	0.50	Worked on organizing correspondence.	52.50
3/28/01	MAH	0.25	Prepared accounting documentation for payment of printing expenses.	26.25
		3.50	PROFESSIONAL SERVICES	772.50

**DISBURSEMENTS**

2/28/01	Printing Expense	459.70
3/05/01	Telephone Expense	1.34
3/05/01	Special Messenger Service	5.35
3/07/01	In-City Transportation	13.00
3/07/01	Photocopy	6.72
3/09/01	Special Messenger Service	11.67

LAW OFFICES  
**JENNER & BLOCK, LLC**

ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

Page 2

3/09/01	Special Messenger Service	20.92
3/09/01	Special Messenger Service	11.67
3/12/01	Long Distance Telephone	0.90
3/13/01	Long Distance Telephone	2.42
3/14/01	Photocopy	1.44
3/19/01	Special Messenger Service	16.74
3/21/01	Long Distance Telephone	3.64
3/23/01	Long Distance Telephone	2.16
3/31/01	Photocopy	2.72
	<b>TOTAL DISBURSEMENTS</b>	<b>560.39</b>

INVOICE TOTAL

\$1,332.89

**SUMMARY OF PROFESSIONAL SERVICES**

<b>ATTORNEY</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
DANIEL LYNCH	1.50	375.00	562.50
MELISSA A HERMAN	2.00	105.00	210.00
<b>TOTAL</b>	<b>3.50</b>		<b>772.50</b>



LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

CLIENT NUMBER 37490-000  
MATTER NUMBER 10005

THE COLEMAN COMPANY  
625 MADISON AVENUE  
NEW YORK, NEW YORK 10022

MAY 17, 2001  
INVOICE # 8803942

**BROWN V. COLEMAN**

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH APRIL 30, 2001 \$240.00

DISBURSEMENTS 116.97

**TOTAL INVOICE \$356.97**

**PRIOR UNPAID INVOICES**

Invoice No. 8788672, 1/17/01 13,296.05

Invoice No. 8792122, 2/28/01 8,009.01

Invoice No. 8795719-1, 3/20/01 8,385.20

Invoice No. 8795719-2, 3/20/01 4,743.05

Invoice No. 8800728, 4/20/01 1,332.89

**TOTAL AMOUNT DUE \$36,123.17**

INVOICE TOTAL

\$356.97

**SUMMARY OF PROFESSIONAL SERVICES**

<b>ATTORNEY</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
DANIEL LYNCH	0.50	375.00	187.50
MELISSA A. HERMAN	0.50	105.00	52.50
TOTAL	1.00		240.00

LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

INVOICE TOTAL

\$356.97

**SUMMARY OF PROFESSIONAL SERVICES**

<b>ATTORNEY</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOU</b>
DANIEL LYNCH	0.50	375.00	187
MELISSA A. HERMAN	0.50	105.00	52
<b>TOTAL</b>	<b>1.00</b>		<b>240</b>

Exhibit D2

LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

CLIENT NUMBER 38440-000  
MATTER NUMBER 10041

SUNBEAM CORPORATION  
2381 EXECUTIVE CENTER DRIVE  
BOCA RATON, FLORIDA 33431  
ATTN: MR. STEVEN P. BERRETH

MAY 17, 2001  
INVOICE # 8803961

**SINCLAIR & RUSH, INC. V. THE COLEMAN**

FOR PROFESSIONAL SERVICES RENDERED THROUGH APRIL 30, 2001	\$1,276.25
DISBURSEMENTS	<u>5.26</u>
TOTAL INVOICE	\$1,281.51

LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

SUNBEAM CORPORATION  
2381 EXECUTIVE CENTER DRIVE  
BOCA RATON, FLORIDA 33431  
ATTN: MR. STEVEN P. BERRETH

INVOICE # 8803961

MAY 17, 2001

CLIENT NUMBER - 38440-000

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH APRIL 30, 2001

SINCLAIR & RUSH, INC. V. THE COLEMAN  
COMPANY, INC.

MATTER NUMBER - 10041

4/10/01	JFM	0.75	Reviewed file and settlement agreement to respond to letter from Sinclair & Rush counsel re alleged contempt.	138.75
4/11/01	JFM	0.50	Reviewed file and settlement agreement to respond to letter from Sinclair & Rush counsel re alleged contempt.	92.50
4/12/01	JFM	0.50	Reviewed Sinclair & Rush's letter re alleged breach of consent final judgment; telephone conference with [REDACTED]	92.50
4/17/01	JFM	1.50	Drafted letter to C. Mulholland Brous responding to her April 10, 2001 letter alleging Coleman's violation of the Consent Final Judgment; drafted second letter to C. Mulholland Brous notifying her that we would respond shortly.	277.50
4/25/01	PLP	0.75	Office conference with [REDACTED] re Sinclair & Rush matter; revised letter to Sinclair & Rush's counsel re same.	258.75
4/25/01	JFM	1.00	Drafted letter to C. Brous re Sinclair & Rush's allegation that Coleman violated the Consent Final Judgment; conferred with P. Patras re same.	185.00
4/26/01	JFM	0.25	Prepared response to 4/26/01 letter from Sinclair & Rush's counsel.	46.25
4/27/01	JFM	1.00	Prepared response to 4/26/01 letter from Sinclair & Rush's counsel.	185.00
		6.25	PROFESSIONAL SERVICES	1,276.25

**DISBURSEMENTS**

4/12/01	Long Distance Telephone	0.18
4/15/01	Photocopy	1.12
4/17/01	Long Distance Telephone	0.36
4/23/01	Postage	0.34
4/25/01	Long Distance Telephone	0.36
4/26/01	Long Distance Telephone	0.36
4/27/01	Long Distance Telephone	0.36
4/27/01	Long Distance Telephone	0.36
4/27/01	Long Distance Telephone	0.36
4/30/01	Photocopy	1.12
4/30/01	Postage	0.34
	<b>TOTAL DISBURSEMENTS</b>	<b>5.26</b>

INVOICE TOTAL \$1,281.51

**SUMMARY OF PROFESSIONAL SERVICES**

<b>ATTORNEY</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
PATRICK L PATRAS	0.75	345.00	258.75
JOSEPH F MARINELLI	5.50	185.00	1,017.50
<b>TOTAL</b>	<b>6.25</b>		<b>1,276.25</b>

Exhibit D3



LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

CLIENT NUMBER 41089-000  
MATTER NUMBER 10001

SUNBEAM CORPORATION/SUNBEAM HEALTH AND  
SAFETY COMPANY/PAMELA WITTENBERG  
2381 EXECUTIVE CENTER DRIVE  
BOCA RATON, FLORIDA 33431  
ATTN: CHERYL S. JACKMAN, ESQ.

APRIL 20, 2001  
INVOICE # 8800801

**TRADE SECRETS LITIGATION**

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH MARCH 31, 2001

\$18,926.25

DISBURSEMENTS

374.81

TOTAL INVOICE

\$19,301.06

LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

SUNBEAM CORPORATION/SUNBEAM HEALTH AND  
SAFETY COMPANY/PAMELA WITTENBERG  
2381 EXECUTIVE CENTER DRIVE  
BOCA RATON, FLORIDA 33431  
ATTN: CHERYL S. JACKMAN, ESQ.

INVOICE # 8800801

APRIL 20, 2001

CLIENT NUMBER - 41089-000

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH MARCH 31, 2001

TRADE SECRETS LITIGATION

MATTER NUMBER - 10001

3/01/01	DFL	14.00	Worked on TRO proceeding; conferred with E. Dorkin re same; interviewed witnesses; telephone conference with client; studied cases, drafted verified answer, drafted memorandum of law; drafted affidavits; conferred with E. Dorkin re status.	5,250.00
3/01/01	ED	8.00	Met with D. Lynch re case background; met with G. Fike re same; researched re same; drafted memorandum in opposition to TRO; office conferences with D. Lynch re same.	1,640.00
3/01/01	DZM	7.75	Prepared and revised Sunbeam defendants' answer to complaint; researched TRO matters under Illinois law; prepared interrogatories and document requests to Taylor.	1,898.75
3/02/01	DFL	5.50	Appeared in Court on TRO proceeding, telephone conference with clients re outcome of proceedings and potential settlement; conferred with E. Dorkin and D. Makarski.	2,062.50
3/02/01	ED	11.50	Revised memorandum in opposition to TRO; drafted motion for expedited discovery; drafted motion for substitution of judge; office conference with D. Makarski and D. Lynch re same; attended TRO hearing.	2,357.50
3/02/01	DZM	6.50	Researched TRO issues under Illinois law; revised interrogatories and document requests to Taylor; prepared P. Wittenberg answer to complaint; prepared motion to dismiss Sunbeam defendants; prepared 206(a)(1) deposition notice to Taylor; conferred with D. Lynch and E. Dorkin.	1,592.50
3/05/01	DFL	5.00	Worked on proposed settlement; telephone conference with clients and opposing counsel.	1,875.00

ALL PAYMENTS DUE WITHIN 30 DAYS OF INVOICE

Federal Identification No. 36-2192554

3/06/01	DFL	3.00	Worked on proposed settlement.	1,125.00
3/07/01	DFL	1.50	Followup on settlement issues; telephone conference with clients and opposing counsel re same.	562.50
3/08/01	DFL	0.50	Worked on proposed dismissal order; telephone conference with T. Cornell re same.	187.50
3/09/01	DFL	0.50	Worked on proposed dismissal order; email to T. Cornell re same.	187.50
3/16/01	DFL	0.25	Circulated settlement materials for signature.	93.75
3/20/01	DFL	0.25	Telephone conference with Paxton re finalization of settlement.	93.75
		64.25	<b>PROFESSIONAL SERVICES</b>	<b>18,926.25</b>

**DISBURSEMENTS**

3/01/01	Clerk of Court Fee	117.00
3/05/01	Court Reporter Charge 3/2/01 Proceedings	237.40
3/14/01	Photocopy	3.52
3/20/01	Special Messenger Service	10.25
3/31/01	Photocopy	6.64
	<b>TOTAL DISBURSEMENTS</b>	<b>374.81</b>

INVOICE TOTAL \$19,301.06

**SUMMARY OF PROFESSIONAL SERVICES**

ATTORNEY	HOURS	RATE	AMOUNT
DANIEL LYNCH	30.50	375.00	11,437.50
DAVID S MAKARSKI	14.25	245.00	3,491.25
ERIC DORKIN	19.50	205.00	3,997.50
<b>TOTAL</b>	<b>64.25</b>		<b>18,926.25</b>

Exhibit D4

LAW OFFICES  
**JENNER & BLOCK, LLC**

ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

CLIENT NUMBER 40067-000  
MATTER NUMBER 10003

FIRST ALERT/SUNBEAM PRODUCTS, INC.  
THE COLEMAN COMPANY  
2111 EAST 37<sup>TH</sup> STREET, NORTH  
WICHITA, KANSAS 67219  
ATTN: KENNETH BELL, ESQ.

MARCH 20, 2001  
INVOICE # 8795760

**ROBB MATTER**

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH FEBRUARY 28, 2001

\$105.00

DISBURSEMENTS

0.72

**TOTAL INVOICE**

\$105.72

PRIOR UNPAID INVOICE

Invoice No. 8788792, 1/24/01

319.06

**TOTAL AMOUNT DUE**

\$424.78

LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

FIRST ALERT/SUNBEAM PRODUCTS, INC.  
THE COLEMAN COMPANY  
2111 EAST 37TH STREET, NORTH  
WICHITA, KANSAS 67219  
ATTN: KENNETH BELL, ESQ.

INVOICE # 8795760

MARCH 20, 2001

CLIENT NUMBER - 40067-000

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH FEBRUARY 28, 2001

ROBB MATTER

MATTER NUMBER - 10003

2/09/01	MMN	0.25	Telephone conference with J. Heller re bankruptcy.	105.00
		0.25	PROFESSIONAL SERVICES	105.00

**DISBURSEMENTS**

2/09/01	Long Distance Telephone	0.72
	TOTAL DISBURSEMENTS	0.72

INVOICE TOTAL \$105.72

**SUMMARY OF PROFESSIONAL SERVICES**

ATTORNEY	HOURS	RATE	AMOUNT
MATTHEW M. NEUMEIER	0.25	420.00	105.00
TOTAL	0.25		105.00

EXHIBIT D5

LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

CLIENT NUMBER 38483-000  
MATTER NUMBER 10007

SUNBEAM CORPORATION  
2381 EXECUTIVE CENTER DRIVE  
BOCA RATON, FL 33431  
ATTN: MR. STEVEN P. BERRETH

MARCH 20, 2001  
INVOICE # 8795745-2

**SEB S.A. V. CLIENT**

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH FEBRUARY 28, 2001

\$512.50

DISBURSEMENTS

21.17

**TOTAL INVOICE**

\$533.67

PRIOR UNPAID INVOICES

Invoice No. 8788670, 1/17/01

54,477.18

Invoice No. 8792153, 2/28/01

7,871.31

**TOTAL AMOUNT DUE**

**\$62,882.16**



LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

SUNBEAM CORPORATION  
2381 EXECUTIVE CENTER DRIVE  
BOCA RATON, FL 33431  
ATTN: MR. STEVEN P. BERRETH

INVOICE # 8795745-2

MARCH 20, 2001

CLIENT NUMBER - 38483-000

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH FEBRUARY 28, 2001

SEB S.A. V. CLIENT

MATTER NUMBER - 10007

2/06/01	CCJ	0.50	Telephone conference with C. Cecchi re bankruptcy and status; prepared notice of bankruptcy.	142.50
2/07/01	RLB	0.50	Telephone conference with S. Berreth; prepared correspondence re filing of bankruptcy.	227.50
2/26/01	CCJ	0.50	Conferred with S. Berreth.	142.50
		1.50	PROFESSIONAL SERVICES	512.50

**DISBURSEMENTS**

2/06/01	Long Distance Telephone	0.36
2/06/01	Long Distance Telephone	0.36
2/06/01	Long Distance Telephone	0.54
2/06/01	Long Distance Telephone	0.72
2/06/01	Long Distance Telephone	0.54
2/06/01	Long Distance Telephone	0.54
2/06/01	Long Distance Telephone	1.62
2/07/01	Long Distance Telephone	0.54
2/07/01	Photocopy	2.56
2/13/01	Long Distance Telephone	0.36
2/14/01	Photocopy	3.20
2/28/01	Special Messenger Service	9.83
	<b>TOTAL DISBURSEMENTS</b>	<b>21.17</b>

INVOICE TOTAL

\$533.67

**SUMMARY OF PROFESSIONAL SERVICES**

<b>ATTORNEY</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
ROBERT L BYMAN	0.50	455.00	227.50
CLARK C JOHNSON	1.00	285.00	285.00
TOTAL	1.50		512.50

LAW OFFICES  
**JENNER & BLOCK, LLC**

ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

CLIENT NUMBER 38483-000  
MATTER NUMBER 10007

SUNBEAM CORPORATION  
2381 EXECUTIVE CENTER DRIVE  
BOCA RATON, FL 33431  
ATTN: MR. STEVEN P. BERRETH

APRIL 20, 2001  
INVOICE # 8800755

**SEB S.A. V. CLIENT**

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH MARCH 31, 2001

\$1,897.50

DISBURSEMENTS

777.27

**TOTAL INVOICE**

\$2,674.77

**PRIOR UNPAID INVOICES**

Invoice No. 8788670, 1/17/01

54,477.18

Invoice No. 8792153, 2/28/01

7,871.31

Invoice No. 8795745-1, 3/20/01

327.50

Invoice No. 8795745-2, 3/20/01

533.67

**TOTAL AMOUNT DUE**

**\$65,884.43**

LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

SUNBEAM CORPORATION  
2381 EXECUTIVE CENTER DRIVE  
BOCA RATON, FL 33431  
ATTN: MR. STEVEN P. BERRETH

INVOICE # 8800755

APRIL 20, 2001

CLIENT NUMBER - 38483-000

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH MARCH 31, 2001

SEB S.A. V. CLIENT

MATTER NUMBER - 10007

3/19/01	SDE	4.25	Organized correspondence, memoranda and court file in preparation for filing; updated re same.	318.75
3/20/01	SDE	0.25	Updated correspondence.	18.75
3/22/01	CCJ	0.25	Telephone conference with K. Hughes.	71.25
3/22/01	TAH	1.50	Attention to copying and production of CD-Roms that had previously been produced to Pentalpha.	255.00
3/22/01	SDE	6.50	Updated court file and memorandum; organized documents from C. Johnson and T. Hudson.	487.50
3/23/01	CCJ	0.25	Telephone conference with B. Sung.	71.25
3/23/01	SDE	1.75	Prepared deposition transcripts requested by C. Johnson; prepared C. Johnson working file.	131.25
3/26/01	SDE	0.50	Organized deposition transcripts requested by C. Johnson.	37.50
3/27/01	SDE	2.75	Reviewed and organized documents requested by C. Johnson; updated correspondence and court file.	206.25
3/28/01	SDE	2.00	Prepared documents for review.	150.00
3/30/01	SDE	2.00	Reviewed and organized documents requested by C. Johnson; prepared conference room for Sunbeam document review; assisted in review of documents.	150.00
		22.00	PROFESSIONAL SERVICES	1,897.50

**DISBURSEMENTS**

3/01/01	Long Distance Telephone	5.81
3/08/01	Long Distance Telephone	1.26
3/22/01	Long Distance Telephone	1.26
3/23/01	Long Distance Telephone	0.36
3/23/01	Long Distance Telephone	1.26
3/27/01	Long Distance Telephone	0.36
3/31/01	Photocopy	766.96
	<b>TOTAL DISBURSEMENTS</b>	<b>777.27</b>

INVOICE TOTAL

\$2,674.77

**SUMMARY OF PROFESSIONAL SERVICES**

<b>ATTORNEY</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
CLARK C JOHNSON	0.50	285.00	142.50
TIMOTHY A HUDSON	1.50	170.00	255.00
SHARYL D EISENSTEIN	20.00	75.00	1,500.00
<b>TOTAL</b>	<b>22.00</b>		<b>1,897.50</b>

LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

CLIENT NUMBER 38483-000  
MATTER NUMBER 10007

SUNBEAM CORPORATION  
2381 EXECUTIVE CENTER DRIVE  
BOCA RATON, FL 33431  
ATTN: MR. STEVEN P. BERRETH

MAY 17, 2001  
INVOICE # 8803975

**SEB S.A. V. CLIENT**

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH APRIL 30, 2001

\$112.50

DISBURSEMENTS

190.78

**TOTAL INVOICE**

\$303.28

**PRIOR UNPAID INVOICES**

Invoice No. 8788670, 1/17/01

54,477.18

Invoice No. 8792153, 2/28/01

7,871.31

Invoice No. 8795745-1, 3/20/01

327.50

Invoice No. 8800755, 4/20/01

2,674.77

**TOTAL AMOUNT DUE**

**\$65,654.04**

LAW OFFICES  
**JENNER & BLOCK, LLC**  
ONE IBM PLAZA  
CHICAGO, ILLINOIS 60611  
(312) 222-9350

UNBEAM CORPORATION  
2381 EXECUTIVE CENTER DRIVE  
BOCA RATON, FL 33431  
ATTN: MR. STEVEN P. BERRETH

INVOICE # 8803975

MAY 17, 2001

CLIENT NUMBER - 38483-000

FOR PROFESSIONAL SERVICES RENDERED  
THROUGH APRIL 30, 2001

SEB S.A. V. CLIENT

MATTER NUMBER - 10007

4/06/01	SDE	0.50	Attended to request from Sunbeam attorney, B. Sung.	37.50
4/11/01	SDE	1.00	Organized document production, deposition files and exhibits for filing.	75.00
		1.50	PROFESSIONAL SERVICES	112.50

**DISBURSEMENTS**

3/25/01	Special Messenger Service			5.35
3/26/01	Special Messenger Service			37.67
3/30/01	Special Messenger Service			125.56
4/06/01	Long Distance Telephone			0.36
4/06/01	Long Distance Telephone			0.36
4/06/01	Long Distance Telephone			0.18
4/09/01	Long Distance Telephone			0.36
4/09/01	Special Messenger Service			16.74
4/15/01	Photocopy			0.24
4/15/01	Photocopy & Related Expenses			3.60
4/16/01	Long Distance Telephone			0.36
	TOTAL DISBURSEMENTS			190.78

INVOICE TOTAL

\$303.28

**SUMMARY OF PROFESSIONAL SERVICES**

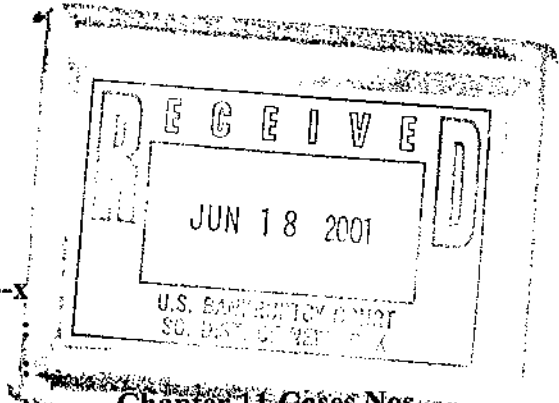
<b>ATTORNEY</b>		<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
SHARYL D EISENSTEIN		1.50	75.00	112.50
	<b>TOTAL</b>	1.50		112.50



EXHIBIT E

Jerold S. Solovy  
Daniel Lynch  
Jenner & Block  
One IBM Plaza  
Chicago, IL 60611  
(312) 222-9350

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**



In re

**AI REALTY MARKETING OF NEW YORK,  
INC., LASER ACQUISITION CORP., DDG I,  
INC., SUNBEAM AMERICAS HOLDINGS, LTD.,  
et al.,**

**Debtors.**

**Chapter 11 Cases Nos.**

**01-40252 (AJG) through  
01-40290 (AJG)**

**(Jointly Administered)**

**CERTIFICATION UNDER GUIDELINES FOR FEES AND DISBURSEMENTS FOR  
PROFESSIONALS WITH RESPECT TO JENNER & BLOCK'S FIRST APPLICATION  
FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES**

I, Daniel Lynch, hereby certify that:

1. I am an attorney at law and the professional designated by the applicant, Jenner & Block, LLC ("Jenner & Block") with responsibility with respect to compliance with the Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases adopted by the Court on April 19, 1995 (the "Local Guidelines") and the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted on January 30, 1996 (the "UST Guidelines").

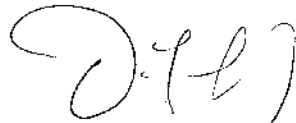
2. This certification is made with respect to Jenner & Block's first application, dated June 15, 2001 (the "Application"), for interim compensation and reimbursement of expenses for the period commencing February 6, 2001 through April 30, 2001 (the "Compensation Period").

3. With respect to section B.1 of the Local Guidelines, I certify that:
- a. I have read the Application;
  - b. to the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Local Guidelines and the UST Guidelines;
  - c. the fees and disbursements sought are billed at rates in accordance with practices customarily employed by Jenner & Block and generally accepted by Jenner & Block's clients; and
  - d. in providing a reimbursable service, Jenner & Block does not make a profit on that service, whether the service is performed by Jenner & Block in-house or through a third party.
4. With respect to section B.2 of the Local Guidelines, I certify that:
- e. the United States Trustee, the Debtors, counsel for the Debtors, and counsel for the pre-petition and post-petition lenders have each been provided on a monthly basis with a statement of Jenner & Block's fees and disbursements accrued during the previous month; and
  - f. the statement contained lists of professionals and paraprofessionals providing services, their respective billing rates, the aggregate hours spent

by each professional and paraprofessional, a general description of the services rendered, a reasonably detailed breakdown of the disbursements incurred, and an explanation of billing practices.

5. With respect of section B.3 of the Local Guidelines, I certify that the United States Trustee, the Debtors, counsel for the Debtors, and counsel for the pre-petition and post-petition lenders have each been provided with a copy of the Application at least 10 days before the deadline set by the Court for filing fee applications.

Dated: June 15, 2001

  
\_\_\_\_\_  
Daniel Lynch

Document Number : 610351

Jerold S. Solovy  
Daniel Lynch  
Jenner & Block  
One IBM Plaza  
Chicago, IL 60611  
(312) 222-9350

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
:  
**In re** :  
:  
:  
**AI REALTY MARKETING OF NEW YORK,** :  
**INC., LASER ACQUISITION CORP., DDG I,** :  
**INC., SUNBEAM AMERICAS HOLDINGS, LTD.,** :  
**et al.** :  
:  
**Debtors.** :  
:  
-----X

**Chapter 11 Cases Nos.**

**01-40252 (AJG) through  
01-40290 (AJG)**

**NOTICE OF FILING**

**TO:**

Steven R. Isko, Esq.  
Sunbeam Corporation  
c/o AI Realty Marketing of New York, Inc.  
2381 Executive Center Drive  
Boca Raton, FL 33431

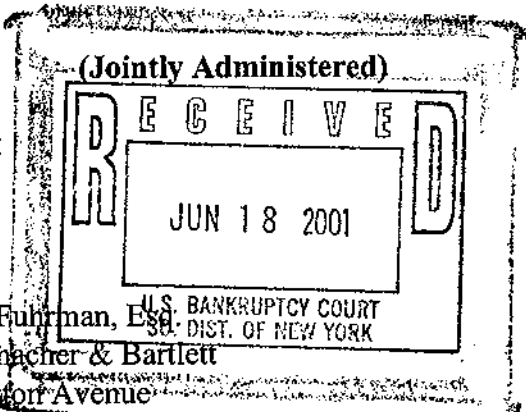
George A. Davis, Esq.  
Weil Gotshal & Manges, LLP  
767 Fifth Avenue  
New York, NY 10153

Paul K. Schwartzberg, Esq.  
The Office of the United States Trustee  
33 Whitehall Street, 21st Floor  
New York, NY 10004

Steven M. Fuhrman, Esq.  
Simpson Thacher & Bartlett  
425 Lexington Avenue  
New York, NY 10017

David Friedman, Esq.  
Lisa Laukitis, Esq.  
Kasowitz Benson Torres & Friedman, LLP  
1633 Broadway  
New York, NY 10019

Chaim F. Fortgang, Esq.  
Wachtell, Lipton, Rosen & Katz  
51 West 52nd Street  
New York, NY 10019



PLEASE TAKE NOTICE that on or about June 18, 2001, we shall file with the Clerk of the United States Bankruptcy Court for the Southern District of New York, copies of the following attached documents:

1. Monthly Fee Statement of Jenner & Block, LLC, Attorneys Employed by Debtors in the Ordinary Course of Business, for Services Rendered and Expenses Advanced from February 6, 2001 Through February 28, 2001;
2. Monthly Fee Statement of Jenner & Block, LLC, Attorneys Employed by Debtors in the Ordinary Course of Business, for Services Rendered and Expenses Advanced from March 1, 2001 Through March 31, 2001;
3. Monthly Fee Statement of Jenner & Block, LLC, Attorneys Employed by Debtors in the Ordinary Course of Business, for Services Rendered and Expenses Advanced from April 1, 2001 Through April 30, 2001; and
4. First Application of Jenner & Block, LLC, Attorneys Employed by Debtors in the Ordinary course of Business, For Allowance of Interim Compensation for Services Rendered and Expenses Advanced from February 6, 2001 Through April 30, 2001.

Respectfully submitted,

JENNER & BLOCK, LLC

By 

\_\_\_\_\_  
One of Its Attorneys

Jerold S. Solovy  
Daniel Lynch  
JENNER & BLOCK, LLC  
One IBM Plaza  
Chicago, IL 60611  
(312) 222-9350

**CERTIFICATE OF SERVICE**

Beau T. Greiman, an attorney, hereby certifies that on June 15, 2001, he caused true and correct copies of the foregoing Notice of Filing, together with the documents referred to therein, to be served on the following parties by U.S. Mails:

Steven R. Isko, Esq.  
Sunbeam Corporation  
c/o AI Realty Marketing of New York, Inc.  
2381 Executive Center Drive  
Boca Raton, FL 33431

Steven M. Fuhrman, Esq.  
Simpson Thacher & Bartlett  
425 Lexington Avenue  
New York, NY 10017

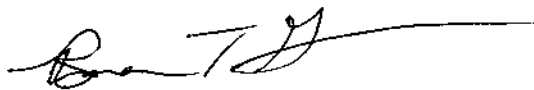
George A. Davis, Esq.  
Weil Gotshal & Manges, LLP  
767 Fifth Avenue  
New York, NY 10153

David Friedman, Esq.  
Lisa Laukitis, Esq.  
Kasowitz Benson Torres & Friedman, LLP  
1633 Broadway  
New York, NY 10019

Paul K. Schwartzberg, Esq.  
The Office of the United States Trustee  
33 Whitehall Street, 21st Floor  
New York, NY 10004

Chaim F. Fortgang, Esq.  
Wachtell, Lipton, Rosen & Katz  
51 West 52nd Street  
New York, NY 10019

By



Beau T. Greiman

### File a Motion:

01-40252-ajg AI Realty Marketing of New York, Inc. and Sunbeam Corporation

Date document filed (mandatory)

6/18/2001

Does this filing refer to an existing document in this case? (If yes, click on the box)

NOTE: If the event you are docketing is an answer/response, you will be prompted on a subsequent screen for its related motion. Therefore, do not click on this box to establish a relationship to the motion you are answering.

Applicant Daniel Lynch

Type Debtor's Attorney

Filer

From 2/6/2001

To 4/30/2001

Fee request \$ 28,557.50

Expense request \$ 2,075.42

Applicant Jenner & Block, LLC

Type Accountant

Filer

From                     

To                     

Fee request \$                     

Expense request \$                     

### Hearing Information

In order to enter a hearing date/time/location, you **must** obtain prior approval from the presiding judge. Contact the Chambers of Judge Gonzalez at 212 668-2894.

Hearing Time [optional]:   AM  PM    Hearing Date [optional]:

Location

### Presentment Information

Enter a presentment time [optional field]

AM  PM

Enter a presentment date [optional field]

Location

Response Due Date



Enter a Response due date [optional field]

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