

David J. O'Connell  
Momkus Ozog & McCluskey LLC  
Attorneys for Debtors  
305 1 Oak Grove Drive, Suite 220  
Downers Grove, Illinois 605 15  
(630) 434-0400

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re AI REALTY MARKETING OF NEW YORK,  
INC., LASER ACQUISITIONS CORP., DDGI  
INC., SUNBEAM AMERICAS HOLDINGS, LTD.,  
et.al.

Case Nos.  
0 1-40252 through  
0 1-40290

Debtors.

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SECOND APPLICATION OF MOMKUS OZOG & MCCLUSKEY LLC  
ATTORNEYS FOR DEBTORS, FOR ALLOWANCE OF INTERIM COMPENSATION FOR  
SERVICES RENDERED FROM JUNE 1, 2001 THROUGH OCTOBER 3 1, 2001  
AND FOR REIMBURSABLE EXPENSES

TO THE HONORABLE ARTHUR J. GONZALEZ  
UNITED STATES BANKRUPTCY JUDGE

Momkus Ozog & McCluskey LLC, attorneys for the Debtors in the Chapter 11 cases of AI REALTY MARKETING OF NEW YORK, INC., LASER ACQUISITIONS CORP., DDGI INC., SUNBEAM AMERICAS HOLDINGS, LTD., et.al., debtors and debtors in possession, submits this second application, pursuant to sections 330 (a) and 33 1 of Title 11 of the United States Bankruptcy Code and Rule 20 16 of the Federal Rules of Bankruptcy Procedure, for the allowance of interim compensation for professional services rendered from June 1, 2001 through October 3 1, 2001, and for reimbursement of expenses incurred in connection with such services, and, in support thereof, respectfully represents:

1. Momkus Ozog & McCluskey LLC seeks allowance of interim compensation for professional services rendered to the Debtors during the period from June 1, 2001 through October 3 1, 2001 in the aggregate amount of \$3 14,920.00, and for reimbursement of expenses incurred in connection with the rendition of such services in the aggregate amount of \$21,074.16

2. Momkus Ozog & McCluskey LLC is the national product liability counsel for the Debtors and has been required to continue to defend and monitor product liability litigation in over 40 open and pending lawsuits. Momkus Ozog & McCluskey LLC has further been engaged by the Debtors to assume responsibility for its Risk Management Department in handling open and pending claims involving various product manufactured and sold by the Debtors. These activities include defending lawsuits involving vendors of product manufactured by the Debtors, lawsuits in which the stay has been lifted, notification of courts of the bankruptcy proceedings, and day to day management of claims and other general product liability matters within the company. Services also included commercial litigation matters for other operating subsidiaries.

3. For these reasons, Momkus Ozog & McCluskey LLC respectfully submits that the services performed on behalf of the Debtors were reasonable and necessary for the continued operation of these companies at the time the services were rendered.

4. Momkus Ozog & McCluskey LLC has previously submitted monthly fee statements to the Debtors, counsel for the Debtors, the United States Trustee and counsel for the post and pre-petition lenders in accordance with the Administrative Order. Pursuant to the Fee Statements and the Administrative Order, to date Momkus Ozog & McCluskey LLC has received an aggregate of \$141,747.77 in fees, plus \$9,531.21 in expenses in respect of services rendered during these Chapter 11 cases. On November 8, 2001 Momkus Ozog & McCluskey LLC submitted a Fee Statement for the period of October 1 through 31, 2001. Pursuant to the Administrative Order, unless an objection is served, the Debtors will pay 80% of the fees for services performed and 100% of the disbursements to Momkus Ozog & McCluskey LLC.

5. This application has been prepared in accordance 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 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 and this Court's Administrative Order dated February 27, 2001 establishing procedures for Interim Compensation and Reimbursement of Expenses of Professionals. Pursuant to local guidelines, a certification regarding compliance with same is attached hereto as Exhibit A.

6. By this application, Momkus Ozog & McCluskey LLC seeks the Court's confirmation of all prior amounts paid to Momkus Ozog & McCluskey LLC pursuant to the

Administrative Order, as well as the allowance of the remainder of the fees and disbursements requested.

7. During the compensation period, Momkus Ozog & McCluskey LLC's attorneys and paraprofessionals expended a total of 2,138.0 hours for which compensation is requested. A schedule setting for the number of hours expended by each of the partners, associates, and paraprofessionals of Momkus Ozog & McCluskey LLC who rendered services to the Debtors, their respective hourly rates, and the year of bar admission for each Momkus Ozog & McCluskey LLC attorney is attached hereto as Exhibit B. A schedule specifying the categories of expenses for which Momkus Ozog & McCluskey LLC is seeking reimbursement and the total amount for each such expense category is attached hereto as Exhibit C. Pursuant to Section II.D. of the U.S.T. Guidelines, a schedule setting forth a description of the project categories utilized in this case, the number of hours expended by the partners, associates, and paraprofessionals of Momkus Ozog & McCluskey LLC by project category, and the aggregate fees associated with each project category is attached hereto as Exhibit D.

8. Momkus Ozog & McCluskey LLC maintains computerized records of the time spent by all attorneys and paraprofessionals in connection with its representations of the Debtors. Subject to redaction for the attorney client privilege where necessary to protect the Debtor, copies of these computerized records were previously furnished to the Court in the format specified by the UST Guidelines.

9. While it believes that all applicable time and disbursement charges have been included herein, to the extent that time or disbursement charges for services-rendered or disbursements incurred relate to the compensation period, but were not processed prior to the preparation of this Application, Momkus Ozog & McCluskey LLC reserves the right to request additional compensation for such services and reimbursement of such expenses in a future application.

10. On February 6, 2001 a voluntary Chapter 11 bankruptcy petition was filed by the Debtors. The Debtors continue to operate their business and manage their properties as debtors in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code. No request has been made for the appointment of a trustee or an examiner.

11. The 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. 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.

12. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards 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 employed "reasonable compensation for actual necessary services rendered . and reimbursement for actual, necessary expenses. 11 U.S.C. 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded, the court should consider the nature, extent, and 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 comparable skilled practitioners in cases other than cases under this title.

11 U.S.C. 330(a)(3).

13. In the instant case, Momkus Ozog & McCluskey LLC respectfully submits that the services for which it seeks compensation in this Application were necessary for and beneficial to the Debtor. These services were performed without duplication of effort or expense incurred by professionals and paraprofessionals employed by Momkus Ozog & McCluskey LLC. Momkus Ozog & McCluskey LLC submits that its request for compensation for the foregoing services is reflective of a reasonable and appropriate amount of time expended in performing

such services commensurate with the complexity, importance and nature of the problem, issue, or task involved.

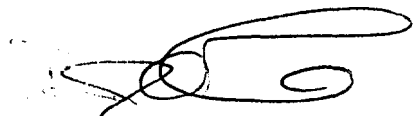
14. As set forth in the certification of David J. O'Connell annexed hereto as Exhibit A, the compensation requested by Momkus Ozog & McCluskey LLC is based on the customary compensation charged by comparably skilled practitioner in cases other than cases under the Bankruptcy Code.

15. Pursuant to the 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, Momkus Ozog & McCluskey LLC respectfully requests that the Court waive the requirement that Momkus Ozog & McCluskey LLC file a memorandum of law in support of this Application.

16. Pursuant to the Administrative Order, copies of this Application have been given to the Debtors, the United States Trustee and counsel for the pre-petition and post-petition lenders. Momkus Ozog & McCluskey LLC submits that this is good and sufficient notice and no other or further notice is necessary.

WHEREFORE, Momkus Ozog & McCluskey LLC respectfully requests (i) an interim allowance of compensation for professional services rendered as attorney for the Debtors above the fee cap in the amount of \$66,850.85 for the period of June 1, 2001 through October 31, 2001 pursuant to this Court's Administrative Order of February 27, 2001; (ii) approval of all expenses incurred for the period of June 1, 2001 through October 31, 2001; and (iii) such other and further relief as is just.

Dated: November 27, 2001



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David J. O'Connell  
Momkus Ozog & McCluskey LLC  
Attorneys for Debtors  
305 1 Oak Grove Drive, Suite 220  
Downers Grove, Illinois 605 15  
(63 0) 434-0400

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Momkus Ozog & McCluskey LLC  
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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re AI REALTY MARKETING OF NEW YORK,  
INC., LASER ACQUISITIONS CORP., DDGI  
INC., SUNBEAM AMERICAS HOLDINGS, LTD.,  
et. al.

Case Nos.  
01-40252 through  
01-40291

Debtors.

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EXHIBIT A  
CERTIFICATION UNDER GUIDELINES FOR FEES AND  
DISBURSEMENTS FOR PROFESSIONALS IN RESPECT OF FIRST  
APPLICATION OF MOMKUS OZOG & MCCLUSKEY LLC FOR INTERIM  
COMPENSATION AND REIMBURSEMENT OF EXPENSES

I, David J. O'Connell, hereby certify that:

1. I am an attorney at law and the professional designated by the applicant, Momkus Ozog & McCluskey LLC with responsibility for compliance with the Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases by the Court on April 19, 1995 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.

2. This certification is made in respect to Momkus Ozog & McCluskey LLC's second application dated November 27, 2001 for interim compensation and reimbursement of expenses for the period commencing June 1, 2001 through October 31, 2001 in accordance with the Local Guidelines.

3. In 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;
- (c) the fees and disbursements sought are billed at rates in accordance with practices customarily employed by Momkus Ozog & McCluskey LLC and generally accepted by Momkus Ozog & McCluskey LLC's clients; and
- (d) in providing a reimbursable service, Momkus Ozog & McCluskey LLC does not make a profit on that service, whether the service is performed by Momkus Ozog & McCluskey LLC in-house or through a third party.

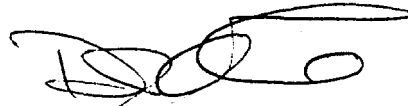
4. In respect of Section B.2 of the Local Guidelines, I certify that:

(a) The debtors, counsel for the debtors, the Office of the United States Trustee, the Court, and counsel for the pre-petition and post-petition lenders have each been provided on a monthly basis with a statement of Momkus Ozog & McCluskey LLC's fees and disbursements accrued during the previous month; and

(b) the statement contained lists of professionals and paraprofessionals providing services, their respective billing rates, the aggregate hours spent by each professional, a general description of the services rendered, a reasonably detailed breakdown of the disbursements incurred, and an explanation of the billing practices.

5. In respect of Section B.3 of the Local Guidelines, I certify that the debtors, counsel for the debtors, the United States Trustee, and counsel for the pre-petition and post-petition lenders are each being provided with a copy of the Application *in* accordance with the Court's Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals.

Dated: November 27, 2001



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David J. O'Connell  
Momkus Ozog & McCluskey LLC

**EXHIBIT B**  
**Momkus Ozon & McCluskey LLC**  
**Rate & Time Schedule For All Matter**  
**June 1, 2001 through October 31, 2001**

<u>Timekeeper</u>	<u>Yr. Admitted</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Total Hours</u>	<u>Total Amount</u>
<b>Partners</b>					
Edward Momkus	1977	Atty	\$200	11.4	\$ 2,280.00
James Ozog	1977	Atty	\$125-200	393.5	\$78,455.00
David O'Connell	1988	Atty	\$ 125-200	537.4	\$98,945.00
James Marsh	1988	Atty	5200	97.3	\$19,460.00
John J. McCluskey	1967	Atty	\$125-200	25.8	\$ 4,020.00
Mark M. Monroe	1986	Atty	\$125-200	1.0	\$ 200.00
<b>Associates</b>					
Edward McGinnis	1976	Atty	\$160	3.2	\$ 512.00
Michael Bardell	1997	Atty	\$160	40.5	\$ 6,480.00
David Sigale	1996	Atty	\$160	1.5	\$ 240.00
Tim Grandchamp	1992	Atty	\$160	6.5	\$ 1,040.00
James M. Rozak	1991	Atty	\$160	271.2	\$43,392.00
<b>Paralegals</b>					
Alison Lezak		Paralegal	\$80	51.3	\$ 4,104.00
Janine Rauch		Paralegal	\$80	2.7	\$ 216.00
Beth Morgan		Paralegal	\$80	657.2	\$ 52,576.00
Jana L. Fischer		Paralegal	\$80	37.5	\$ 3,000.00
<b>Totals</b>				<b>2,138.0</b>	<b>\$314,920.00</b>

**EXHIBIT C**  
**Momkus Ozog & McCluskey LLC**  
**Disbursement Schedule for June 1, 2001 through October 31, 2001**

<u>Disbursement</u>	<u>Amount</u>
Long Distance Telephone Expense	\$ 187.34
Overnight Courier Expense	\$ 927.11
Document Reproduction	\$ 2,211.21
Domestic Travel	\$15,512.81
Local Travel	\$ 549.43
Document Retrieval	\$ 475.00
Research	\$ 621.36
Court Reporter	\$ 589.90
<b>Total</b>	<b>\$21,074.16</b>

David J. O'Connell



PROOF OF SERVICE

Under penalties as provided by law, DAVID J. O'CONNELL, certifies that he mailed a true and correct copy of the **Second Application of Momkus Ozog & McCluskey LLC** to the following parties:

Sunbeam Corporation  
23 8 1 Executive Center Drive  
Boca Raton, Florida 3343 1  
Attn: Steven R. Isko, Esq.

U.S. Bankruptcy Court  
1 Bowling Green  
New York, New York 10004  
Attn: Judge Arthur J. Gonzalez

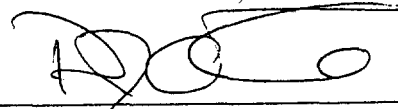
Weil Gotshal & Manges LLP  
767 Fifth Avenue  
New York, New York 10 153  
Attn: George A. Davis, Esq.

The Office of the United States Trustee  
33 Whitehall Street  
2 1<sup>st</sup> Floor  
New York, New York 10004  
Attn: Paul K. Schwartzberg, Esq.

Wachtell, Lipton, Rosen & Katz  
51 West 52<sup>nd</sup> Street  
New York, New York 10019  
Attn: Chaim J. Fortgang

Simpson Thacher & Bartlett  
425 Lexington Avenue  
New York, New York 100 17  
Attn: Steven M. Fuhrman, Esq.

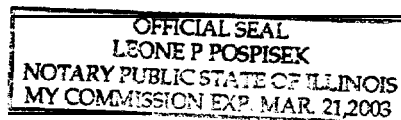
by mailing such copies in a stamped envelope, addressed to each party and depositing same in a U.S. Mail Box at Downers Grove, Illinois 60515 on November 27, 2001



David J. O'Connell

**Subscribed and Sworn to**  
before me this 27<sup>th</sup> day  
of November, 2001.

*Leone P. Pospisek*  
Notary Public



Momkus Ozog & McCluskey LLC  
Attorneys for Debtors  
305 1 Oak Grove Drive, Suite 220  
Downers Grove, Illinois 605 15  
(630) 434-0400

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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**In re** AI REALTY MARKETING OF NEW YORK,  
INC., LASER ACQUISITIONS CORP., DDGI  
INC., SUNBEAM AMERICAS HOLDINGS, LTD.,  
**et.al.**

Case Nos.  
0 1-40252 through  
01-40290

Debtors.

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EXHIBIT D  
SECOND APPLICATION OF MOMKUS OZOG & MCCLUSKEY LLC  
ATTORNEYS FOR DEBTORS, FOR ALLOWANCE OF INTERIM COMPENSATION FOR  
SERVICES RENDERED FROM JUNE 1, 2001 THROUGH OCTOBER 31, 2001  
AND FOR REIMBURSABLE EXPENSES

VOLUME I of III

**MOMKUS OZOG & McCLUSKEY LLC**  
ATTORNEYS AT LAW

P.O. BOX 9250  
3051 OAK GROVE DRIVE, SUITE 220  
DOWNERS GROVE, ILLINOIS 60515-9250

(630) 434-0400  
FAX(630) 434-0444  
JULY 12, 2001

Steven R. Isko, Esq.  
Sunbeam Corporation  
238 1 Executive Center Drive  
Boca Raton, Florida 3343 1

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FOR PROFESSIONAL SERVICES AND DISBURSEMENTS

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Reference No. \_\_\_\_\_

Bill No. \_\_\_\_\_

Re: AI REALTY MARKETING OF NEW YORK,  
INC., LASER ACQUISITION CORP., DDGI,  
INC., SUNBEAM AMERCAS HOLDINGS, LTD.,  
et al.,  
Case Nos. 01-40252 through 01-40291  
(June 1.2001 -June 30.2001)

Including continued administration, defense and prosecution of litigated matters and claims involving contract and product liability pending in various State and Federal courts throughout the United States including the defense of retailers as more fully set forth in the individual invoices. Further work includes administration of bankruptcy procedures and documentation for BRK Brands, Inc. as more fully set forth in the individual invoice attached. Billing information on the identified invoices may have been redacted to protect information that is confidential and/or subject to the attorney-client privilege or work product doctrine.

Total	\$48,800.50	
Less Holdback as per Court Order dated February 27, 2001	(\$9,760.10)	\$39,040.40
DISBURSEMENTS:		
Overnight Courier Expense	\$ 457.35	
Document Reproduction	\$ 175.94	
Domestic Travel	\$6,089.57	
Auto Expense/Parking	\$ 93.20	
TOTAL		\$ 6,816.06
Amount Payable Pursuant to Court Order dated February 27, 2001		<u>\$45,856.46</u>

**MOMKUS OZOG & MCCLUSKEY LLC**

RATE AND TIME SCHEDULE FOR ALL MATTERS  
June 1 – 30, 2001

<b>Timekeeper</b>	<b>Position</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Total Amount</b>
James Ozog	Partner	\$125.00 - \$200.00	25.6	\$5,095.00
David J. O'Connell	Partner	\$125.00 - \$200.00	120.7	21,992.50
John J. McCluskey	Partner	\$125.00 - \$200.00	1.8	225.00
James P. Marsh	Partner	\$125.00 - \$200.00	23.0	4,600.00
<b>Total Partner Time</b>			<b>171.1</b>	<b>\$31,912.50</b>
P. Timothy Grandchamp	Associate	\$160.00	5.5	880.00
James M. Rozak	Associate	\$160.00	43.2	6,912.00
David G. Sigale	Associate	\$160.00	1.5	240.00
<b>Total Associate Time</b>			<b>50.2</b>	<b>\$8,032.00</b>
Beth A. Morgan	Paralegal	\$80.00	107.7	\$8,616.00
Jana L. Fischer	Paralegal	\$80.00	3.0	240.00
<b>Total Paralegal Time</b>			<b>110.7</b>	<b>\$8,856.00</b>
<b>TOTAL DUE</b>			<b>332.0</b>	<b>\$48,800.50</b>

DISBURSEMENT SCHEDULE  
June 1-30,2001

<b>Disbursement</b>	<b>Amounts</b>	<b>Total</b>
Overnight Courier Expense	\$457.35	
Document Reproduction Sir Speedy	175.94	
Domestic Travel	<b>6,089.57</b>	
Local Travel	93.20	
<b>TOTAL DUE</b>		<b>\$6,816.06</b>

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**PROOF OF SERVICE**

Under penalties as provided by law, DAVID J. O'CONNELL, certifies that he mailed a true and correct copy of the **Invoice for Professional Services and Disbursements** to the following parties:

Sunbeam Corporation  
238 1 Executive Center Drive  
**Boca Raton**, Florida 3343 1  
Attn: Steven R. Isko, Esq.

U.S. Bankruptcy Court  
1 Bowling Green  
New York, New York 10004  
Attn: Judge Arthur J. Gonzalez

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

The **Office** of the United States Trustee  
33 Whitehall Street  
21<sup>st</sup> Floor  
New York, New York 10004  
Attn: Paul **K.** Schwartzberg, Esq.

Wachtell, **Lipton, Rosen & Katz**  
51 West 52<sup>nd</sup> Street  
New York, New York 100 19  
Attn: Chaim J. **Fortgang**

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

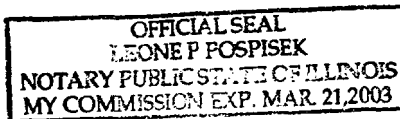
by mailing such copies in a stamped envelope, addressed to each party and depositing same in a U.S. Mail Box at Downers Grove, Illinois 60515 on July 12, 2001



David J. O'Connell

**Subscribed and Sworn to**  
before me this 12<sup>th</sup> day  
of July, 2001.

*Leone P. Pospisek*  
Notary Public



**MOMKUS OZOG & McCLUSKEY LLC**  
ATTORNEYS AT LAW

P.O. Box 9250  
3051 OAK GROVE DRIVE, SUITE 220  
DOWNERS GROVE, ILLINOIS 60515-9250

(630) 434-0400  
FAX (630) 434-0444  
AUGUST 14, 2001

Steven R Isko, Esq.  
Sunbeam Corporation  
23 8 1 Executive Center Drive  
Boca Raton, Florida 3343 1

---

FOR PROFESSIONAL SERVICES AND DISBURSEMENTS

---

Reference No. \_\_\_\_\_

Bill No. \_\_\_\_\_

Re: AI REALTY MARKETING OF NEW YORK,  
INC., LASER ACQUISITION CORP., DDGI,  
INC., SUNBEAM AMERCAS HOLDINGS, LTD.,  
et al.  
Case Nos. 01-40252 through 01-40291  
(July 1, 2001 – July 31, 2001)

Including continued administration, defense and prosecution of litigated matters and claims involving contract and product liability pending in various State and Federal courts throughout the United States including the defense of retailers as more **fully** set forth in the individual invoices. Further work includes administration of bankruptcy procedures and documentation for BRK Brands, Inc. as more fully set forth in the individual invoice attached. Billing information on the identified invoices may have been redacted to protect information that is confidential and/or subject to the attorney-client privilege or work product doctrine.

Total	\$60,261.50	
Less <b>Holdback</b> as per Court Order dated February 27, 2001	(\$12,052.30)	\$48,209.20
DISBURSEMENTS:		
Overnight Courier Expense	\$188.60	
Document Reproduction	\$529.99	
Domestic Travel	\$260.00	
Research Fee	\$60.00	
TOTAL		\$ 1,038.59
Amount Payable Pursuant to Court Order dated February 27, 2001		<u>\$49,247.79</u>

**MOMKUS OZOG & MCCLUSKEY LLC**

RATE AND TIME SCHEDULE FOR ALL MATTERS  
July 1 – 31, 2001

<b>Timekeeper</b>	<b>Position</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Total Amount</b>
James Ozog	Partner	\$125.00 - <b>\$200.00</b>	<b>79.0</b>	<b>\$15,715.00</b>
David J. O'Connell	Partner	\$125.00 - <b>\$200.00</b>	<b>103.9</b>	<b>19,585.00</b>
John J. McCluskey	Partner	\$125.00 - <b>\$200.00</b>	<b>11.4</b>	<b>1,837.50</b>
Mark W. Monroe	Partner	\$125.00 - <b>\$200.00</b>	<b>1.0</b>	<b>200.00</b>
James P. Marsh	Partner	\$125.00 - <b>\$200.00</b>	<b>14.9</b>	<b>2,980.00</b>
<b>Total Partner Time</b>			<b>210.20</b>	<b>40,317.50</b>
James M. Rozak	Associate	<b>\$160.00</b>	<b>50.8</b>	<b>8,128.00</b>
<b>Total Associate Time</b>			<b>50.8</b>	<b>8,128.00</b>
Beth A. Morgan	Paralegal	<b>\$80.00</b>	<b>113.3</b>	<b>9,064.00</b>
Jana L. Fischer	Paralegal	<b>\$80.00</b>	<b>34.0</b>	<b>2,720.00</b>
Janine E. Rauch	Paralegal	<b>\$80.00</b>	<b>.4</b>	<b>32.00</b>
<b>Total Paralegal Time</b>			<b>147.7</b>	<b>11,816.00</b>
<b>TOTAL DUE</b>			<b>408.7</b>	<b>\$60,261.50</b>

DISBURSEMENT SCHEDULE  
June 1-30,2001

<b>Disbursement</b>	<b>Amounts</b>	<b>Total</b>
Overnight Courier Expense	\$188.60	
Document Reproduction Sir Speedy	<b>529.99</b>	
Domestic Travel	<b>260.00</b>	
Research Fee	<b>60.00</b>	
<b>TOTAL DUE</b>		<b>\$1,038.59</b>

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Momkus Ozog & McCluskey LLC  
Attorneys for Debtors  
305 1 Oak Grove Drive, Suite 220  
Downers Grove, Illinois 605 15  
(630) 434-0400

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re AI REALTY MARKETING OF NEW YORK,  
INC., LASER ACQUISITIONS CORP., DDGI  
INC., SUNBEAM AMERICAS HOLDINGS, LTD.,  
et.al.

Case Nos.  
01-40252 through  
01-40290

Debtors.

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EXHIBIT D  
SECOND APPLICATION OF MOMKUS OZOG & MCCLUSKEY LLC  
ATTORNEYS FOR DEBTORS, FOR ALLOWANCE OF INTERIM COMPENSATION FOR  
SERVICES RENDERED FROM JUNE 1, 2001 THROUGH OCTOBER 31, 2001  
AND FOR REIMBURSABLE EXPENSES

VOLUME II of III



**MOMKUS OZOG & MCCLUSKEY LLC**  
ATTORNEYS AT LAW

P.O. BOX 9250  
3051 OAK GROVE DRIVE, SUITE 220  
DOWNERS GROVE, ILLINOIS 60515-9250

(630) 434-0400  
FAX(630) 434-0444  
SEPTEMBER 12, 2001

Steven R. Isko, Esq.  
Sunbeam Corporation  
23 8 1 Executive Center Drive  
**Boca Raton, Florida 3343 1**

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FOR PROFESSIONAL SERVICES AND DISBURSEMENTS

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Reference No. \_\_\_\_\_

Bill No. \_\_\_\_\_

Re: AI REALTY MARKETING OF NEW YORK,  
INC., LASER ACQUISITION CORP., DDGI,  
INC., SUNBEAM AMERCAS HOLDINGS, LTD.,  
et al.  
Case Nos. 01-40252 through 01-40291  
(August 1, 2001 – August 3 1.2001)

Including continued administration, defense and prosecution of litigated matters and claims involving contract and product liability pending in various State and Federal courts throughout the United States including the defense of retailers as more fully set forth in the individual invoices. Further work includes administration of bankruptcy procedures and documentation for BRK Brands, Inc. as more fully set forth in the individual invoice attached. Billing information on the identified invoices may have been redacted to protect information that is confidential and/or subject to the attorney-client privilege or work product doctrine.

Total	<b>\$77,337.00</b>	
Less <b>Holdback</b> as per Court Order dated February 27,200 1	<b>(\$19,334.25)</b>	<b>\$58,002.75</b>
<b>DISBURSEMENTS:</b>		
Overnight Courier Expense	\$ 135.83	
Document Reproduction	\$ 459.37	
Domestic Travel	<b>\$4,575.94</b>	
Auto Expense/Parking	\$ 224.89	
Research Fee	\$ 23.16	
Court Reporter	<b>\$ 326.50</b>	
TOTAL		<b>\$ 5,745.69</b>
Amount Payable Pursuant to Court Order dated February 27,2001		<b><u>\$63,748.44</u></b>

**MOMKUS OZOG & MCCLUSKEY LLC**

RATE AND **TIME** SCHEDULE FOR ALL MATTERS

August 1 – 31, 2001

<b>Timekeeper</b>	<b>Position</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Total Amount</b>
James Ozog	Partner	\$125.00 - \$200.00	110.0	<b>\$21,895.00</b>
David J. O'Connell	Partner	\$125.00 - \$200.00	109.2	<b>19,880.00</b>
John J. McCluskey	Partner	\$125.00 - \$200.00	2.8	350.00
James P. Marsh	Partner	\$125.00 - \$200.00	24.1	<b>4,820.00</b>
<b>Total Partner Time</b>			<b>246.1</b>	<b>\$46,945.00</b>
James M. Rozak	Associate	\$160.00	98.1	<b>\$15,696.00</b>
<b>Total Associate Time</b>			<b>98.1</b>	<b>\$15,696.00</b>
Beth A. Morgan	Paralegal	<b>\$80.00</b>	151.3	<b>\$12,104.00</b>
<b>Jana</b> L. Fischer	Paralegal	<b>\$80.00</b>	.5	40.00
Janine E. <b>Rauch</b>	Paralegal	\$80.00	2.3	184.00
Alison <b>J.</b> Lezak	Paralegal	\$80.00	29.6	<b>2,368.00</b>
<b>Total Paralegal Time</b>			<b>183.7</b>	<b>\$14,696.00</b>
<b>TOTAL DUE</b>			<b>527.9</b>	<b>\$77,337.00</b>

DISBURSEMENT SCHEDULE

August 1-31, 2001

<b>Disbursement</b>	<b>Amounts</b>	<b>Total</b>
Overnight Courier Expense	135.83	
Document Reproduction Sir Speedy	459.37	
Domestic Travel	<b>4,575.94</b>	
Auto Expense/Parking	224.89	
Research Fee	23.16	
Court Reporter	326.50	
<b>TOTAL DUE</b>		<b>\$5,745.69</b>

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Momkus Ozog & McCluskey LLC  
Attorneys for Debtors  
305 1 Oak Grove Drive, Suite 220  
Downers Grove, Illinois 605 15  
(630) 434-0400

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re AI REALTY MARKETING OF NEW YORK,  
INC., LASER ACQUISITIONS **CORP.**, DDGI  
INC., SUNBEAM AMERICAS HOLDINGS, LTD.,  
**et.al.**

Case Nos.  
01-40252 through  
01-40290

Debtors.

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EXHIBIT D  
SECOND APPLICATION OF MOMXUS OZOG & MCCLUSKEY LLC  
ATTORNEYS FOR DEBTORS, FOR ALLOWANCE OF INTERIM COMPENSATION FOR  
SERVICES RENDERED FROM JUNE 1, 2001 THROUGH OCTOBER 31, 2001  
AND FOR REIMBURSABLE EXPENSES

VOLUME III of III

**MOMKUS OZOG & McCLUSKEY LLC**  
ATTORNEYS AT LAW

P.O. Box 9250  
3051 OAK GROVE DRIVE, SUITE 220  
DOWNERS GROVE, ILLINOIS 0515-9250

(630) 434-0400  
FAX(630) 434-0444  
OCTOBER 5, 2001

Steven R Isko, Esq.  
Sunbeam Corporation  
23 8 1 Executive Center Drive  
Boca Raton, Florida 3343 1

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FOR PROFESSIONAL SERVICES AND DISBURSEMENTS

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Reference No. \_\_\_\_\_

Bill No. \_\_\_\_\_

Re: AIREALTY MARKETING OF NEW YORK,  
INC., LASER ACQUISITION CORP., DDGI,  
INC., SUNBEAM AMERCAS HOLDINGS, LTD.,  
et al.  
Case Nos. 01-40252 through 01-40291  
(September 1, 2001 – September 30, 2001)

Including continued administration, defense and prosecution of litigated matters and claims involving contract and product liability pending in various State and Federal courts throughout the United States including the defense of retailers as more **fully** set forth in the individual invoices. Further work includes administration of bankruptcy procedures and documentation for **BRK** Brands, Inc. as more **fully** set forth in the individual invoice attached. Billing information on the identified invoices may have been redacted to protect information that is confidential and/or subject to the attorney-client privilege or work product doctrine.

<b>Total</b>	<b>\$45,357.50</b>	
Less <b>Holdback</b> as per Court Order dated February 27, 200 1	(\$ 9,071.50)	<b>\$36,286.00</b>
<b>DISBURSEMENTS:</b>		
Overnight Courier Expense	\$ 83.20	
Document Reproduction	\$ 515.14	
Domestic Travel	<b>\$2,616.83</b>	
Auto Expense/Parking	\$ 201.26	
Court Reporter	\$ 263.40	
<b>TOTAL</b>		<b>\$ 3,679.83</b>
Amount Payable Pursuant to Court Order dated February 27, 200 1		<u>\$39,965.83</u>

**MOMKUS OZOG & MCCLUSKEY LLC**

RATE AND TIME SCHEDULE FOR ALL MATTERS  
September 1 – 30, 2001

<b>Timekeeper</b>	<b>Position</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Total Amount</b>
James Ozog	Partner	\$125.00 - \$200.00	59.0	\$11,770.00
David J. O'Connell	Partner	\$125.00 - \$200.00	106.2	19,382.50
John J. McCluskey	Partner	\$125.00 - \$200.00	7.9	1,325.00
James P. Marsh	Partner	\$125.00 - \$200.00	1.0	200.00
<b>Total Partner Time</b>			<b>174.1</b>	<b>\$32,677.50</b>
James M. Rozak	Associate	\$160.00	18.2	\$2,912.00
<b>Total Associate Time</b>			<b>18.2</b>	<b>\$2,912.00</b>
Beth A. Morgan	Paralegal	\$80.00	112.0	\$8,960.00
Alison J. Lezak	Paralegal	\$80.00	10.1	808.00
<b>Total Paralegal Time</b>			<b>122.1</b>	<b>\$9,768.00</b>
<b>TOTAL DUE</b>			<b>314.40</b>	<b>45,357.50</b>

DISBURSEMENT SCHEDULE  
September 1-30,2001

<b>Disbursement</b>	<b>A m o u n t s</b>	<b>Total</b>
Overnight Courier Expense	\$83.20	
Document Reproduction Sir Speedy	515.14	
Domestic Travel	2,616.83	
Auto Expense/Parking	201.26	
Court Reporter	263.40	
<b>TOTAL DUE</b>		<b>\$3,679.83</b>

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**PROOF OF SERVICE**

Under penalties as provided by law, DAVID J. O'CONNELL, certifies that he mailed a true and **correct** copy of the **Invoice for Professional Services and Disbursements** to the following parties:

Sunbeam Corporation  
23 8 1 Executive Center Drive  
**Boca Raton**, Florida 3343 1  
Attn: Steven R Isko, Esq.

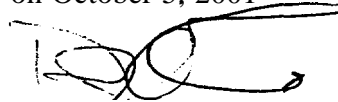
**Weil Gotshal & Manges** LLP  
767 **Fifth** Avenue  
New York, New York 10 153  
Attn: George A. Davis, Esq.

The **Office** of the United States Trustee  
33 Whitehall Street  
**2 1<sup>st</sup>** Floor  
New York, New York 10004  
Attn: Paul **K.** Schwartzberg, Esq.

Wachtell, **Lipton, Rosen & Katz**  
51 West 52<sup>nd</sup> Street  
New York New York 10019  
Attn: Chaim J. **Fortgang**

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

by mailing such copies in a stamped envelope, addressed to each party and depositing same in a U.S. Mail Box at Downers Grove, Illinois 60515 on October 5, 2001

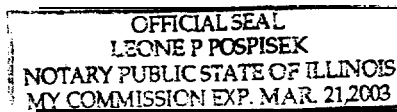


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David J. O'Connell

**Subscribed and Sworn** to  
before me this 5<sup>th</sup> day  
of October, 2001.

*Leone P. Pospisek*  
Notary Public



**MOMKUS OZOG & McCLUSKEY LLC**  
ATTORNEYS AT LAW

P.O. Box 9250  
3051 OAK GROVE DRIVE, SUITE 220  
DOWNERS GROVE, ILLINOIS 60515-9250

(630) 434-0400  
FAX(630) 434-0444  
NOVEMBER 8, 2001

Steven R. Isko, Esq.  
Sunbeam Corporation  
238 1 Executive Center Drive  
Boca Raton, Florida 3343 1

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FOR PROFESSIONAL SERVICES AND DISBURSEMENTS

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Reference No. \_\_\_\_\_

Bill No. \_\_\_\_\_

Re: AI REALTY MARKETING OF NEW YORK,  
INC., LASER ACQUISITION CORP., DDGI,  
INC., SUNBEAM AMERCAS HOLDINGS, LTD.,  
et al.,  
Case Nos. 01-40252 through 01-40291  
(October 1, 2001 – October 31, 2001)

Including continued administration, defense and prosecution of litigated matters and claims involving contract and product liability pending in various State and Federal courts throughout the United States including the defense of retailers as more fully set forth in the individual invoices. Further work includes administration of bankruptcy procedures and documentation for BRK Brands, Inc. as more fully set forth in the individual invoice attached. Billing information on the identified invoices may have been redacted to protect information that is confidential and/or subject to the attorney-client privilege or work product doctrine.

Total	\$83,163.50	
Less <b>Holdback</b> as per Court Order dated February 27, 2001	(\$16,632.70)	\$66,530.80

DISBURSEMENTS:

Overnight Courier Expense	\$ 62.13	
Document Reproduction	\$ 530.77	
Domestic Travel	\$1,970.47	
Auto Expense/Parking	\$ 30.08	
Research	\$ 538.20	
Document Retrieval	\$ 475.00	
Telephone Expense	\$ 187.34	
TOTAL		\$ 3,793.99

Amount Payable Pursuant to Court Order dated February 27, 2001		\$70,324.79
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**MOMKUS OZOG & MCCLUSKEY LLC**

RATE AND TIME SCHEDULE FOR ALL MATTERS

October 1 – 31, 2001

<b>Timekeeper</b>	<b>Position</b>	<b>Hourly Rate</b>	<b>Total Hours</b>	<b>Total Amount</b>
Edward J. Momkus	Partner	\$125.00 - \$200.00	11.4	\$2,280.00
James Ozog	Partner	\$125.00 - \$200.00	119.9	23,980.00
David J. O'Connell	Partner	\$125.00 - \$200.00	97.4	18,105.00
John J. McCluskey	Partner	\$125.00 - \$200.00	1.9	282.50
James P. Marsh	Partner	\$125.00 - \$200.00	34.3	6,860.00
<b>Total Partner Time</b>			<b>264.9</b>	<b>\$51,507.50</b>
Edward F. McGinnis	Associate	\$160.00	3.2	\$512.00
P. Timothy Grandchamp	Associate	\$160.00	1.0	160.00
James M. Rozak	Associate	\$160.00	60.9	9,744.00
Michael J. Bardell	Associate	\$160.00	40.5	6,480.00
<b>Total Associate Time</b>			<b>105.6</b>	<b>\$16,896.00</b>
Beth A. Morgan	Paralegal	\$80.00	172.9	\$13,832.00
Alison J. Lezak	Paralegal	\$80.00	11.6	928.00
<b>Total Paralegal Time</b>			<b>184.5</b>	<b>\$14,760.00</b>
<b>TOTAL DUE</b>			<b>555.0</b>	<b>\$83,163.50</b>

DISBURSEMENT SCHEDULE

October 1 -31, 2001

<b>Disbursement</b>	<b>Amounts</b>	<b>Total</b>
Overnight Courier Expense	\$62.13	
Document Reproduction Sir Speedy	530.77	
Domestic Travel	1,970.47	
Auto Expense/Parking	30.08	
Research	538.20	
Document Retrieval	475.00	
Telephone Expense	187.34	
<b>TOTAL DUE</b>		<b>\$3,793.99</b>

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**PROOF OF SERVICE**

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238 1 Executive Center Drive  
**Boca Raton, Florida 3343 1**  
Attn: Steven R. Isko, Esq.

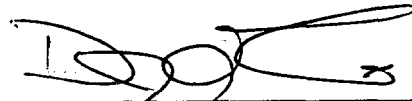
Weil Gotshal & Manges LLP  
767 Fifth Avenue  
New York, New York 10153  
Attn: George A. Davis, Esq.

The **Office** of the United States Trustee  
33 Whitehall Street  
21<sup>st</sup> Floor  
New York, New York 10004  
Attn: Paul K. Schwartzberg, Esq.

Wachtell, **Lipton, Rosen & Katz**  
51 West 52<sup>nd</sup> Street  
New York, New York 10019  
Attn: Chaim J. Fortgang

Simpson **Thacher & Bartlett**  
425 Lexington Avenue  
New York., New York 100 17  
Attn: Steven M. Fuhrman, Esq.

by mailing such copies in a stamped envelope, addressed to each party and depositing same in a U.S. Mail Box at Downers Grove, Illinois 60515 on November 8, 2001



David J. O'Connell

**Subscribed and Sworn** to  
before me this 8<sup>th</sup> day  
of November, 2001.

*Leone P. Pospisek*  
Notary Public

