

STILLMAN & FRIEDMAN, P.C.  
Litigation Counsel for Debtor  
425 Park Avenue  
New York, New York 10022  
(212) 223-0200  
Julian W. Friedman, Esq. (JF 6010)

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
In re : Chapter 11 Case No.  
: 01-40291 (AJG)  
SUNBEAM CORPORATION, :  
Debtor. :  
----- X

**COVER SHEET PURSUANT TO UNITED STATES TRUSTEE  
GUIDELINES FOR REVIEWING APPLICATIONS FOR  
COMPENSATION AND REIMBURSEMENT OF EXPENSE  
FILED UNDER 11 U.S.C. § 330**

**FINAL APPLICATION**

NAME OF APPLICANT:	Stillman & Friedman, P.C.
ROLE OF APPLICANT:	Litigation Counsel for Debtor
CURRENT APPLICATION:	Fees Requested: \$11,223.18 Expenses Requested: \$ 9,964.63
PRIOR APPLICATION:	None
FINAL APPLICATION:	Total Fees Requested: \$11,223.18 Total Expenses Requested: \$ 9,964.63

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
In re : Chapter 11 Case No.  
SUNBEAM CORPORATION, : 01-40291 (AJG)  
Debtor. :  
----- X

**APPLICATION OF STILLMAN & FRIEDMAN, P.C.,  
LITIGATION COUNSEL FOR DEBTOR, FOR FINAL  
ALLOWANCE OF COMPENSATION FOR  
PROFESSIONAL SERVICES RENDERED AND FOR  
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES**

TO THE HONORABLE ARTHUR J. GONZALEZ  
UNITED STATES BANKRUPTCY JUDGE

Stillman & Friedman, P.C. (“S&F”), litigation counsel for Sunbeam Corporation as Debtor in Possession in this Chapter 11 case (the “Debtor”), for its final application (the “Final Application”), pursuant to § 330 of Title 11 of the United States Code (the “Bankruptcy Code”) and Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), for the final allowance of compensation for professional services performed by S&F for the Debtor during the months of January, 2002 and May, 2002 (the “Final Compensation Period”), and for reimbursement

of its actual and necessary expenses incurred during the Final Compensation Period, respectfully represents as follows:

**SUMMARY OF PROFESSIONAL COMPENSATION  
AND REIMBURSEMENT OF EXPENSES REQUESTED**

1. Based on the balance of this application, S&F is requesting a final award of \$21,187.18.

2. This Final Application has been prepared in accordance with the Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy cases (the “Local Guidelines”), the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 (the “U.S.T. Guidelines”), and the Amended Order Pursuant to §§ 327 and 328 of the Bankruptcy Code Authorizing Employment of Professionals Utilized in the Ordinary Course of Business (the “Administrative Order” and, collectively with the Local Guidelines and the U.S.T. Guidelines, the “Guidelines”). Pursuant to the Local Guidelines, a certification regarding compliance with the same is attached hereto as Exhibit A.

3. S&F seeks allowance of compensation for professional services rendered to the Debtor in the amount of \$11,223.18, and for reimbursement of expenses incurred in connection with the rendition of such services in the aggregate amount of \$9,964.63. During the Final Compensation Period, S&F attorneys and para-professionals expended a total of 253.20 hours, resulting in total time charges of \$61,875.63. Of the aforesaid amount, payment was received of \$50,652.45, leaving an unpaid balance of \$11,223.18, payment of which is requested in this application.

4. During the Final Compensation Period, S&F has received no payment and no promises of payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Final Application, with the sole exception of the payments referred to in ¶ 3 above.

5. There is no agreement or understanding between S&F and any other person, other than members of S&F, for the sharing of compensation to be received for services rendered to the Debtor.

6. The fees charged by S&F which are the subject of this Final Application are in accordance with S&F's existing billing rates and procedures in effect during the Final Compensation Period. The rates S&F charged for the services rendered to Debtor by its professionals and para-professionals are the same rates S&F charges for professional and para-professional services rendered in non-bankruptcy matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases.

7. Pursuant to the U.S.T. Guidelines, annexed hereto as Exhibit B is a schedule setting forth all S&F professionals and para-professionals who have performed services in this matter during the Final Compensation Period, the capacities in which each such individual is employed by S&F, the hourly billing rate charged by S&F for services performed by such individual, the aggregate number of hours expended in this matter and the fees billed therefor, and the year in which each lawyer was first licensed to practice law.

8. Annexed hereto as Exhibit C is a schedule specifying the categories of expenses for which S&F is seeking reimbursement and the total amount for each such expense category.

9. Pursuant to § II.D of the U.S.T. Guidelines, annexed hereto as Exhibit D is a summary of S&F's time records showing time billed during the Final Compensation Period.

10. S&F maintains computerized records of the time spent of all S&F attorneys and para-professionals in connection with the services rendered to Debtor. Subject to redaction for attorney-client privilege where necessary, copies of these computerized records will be furnished to the Court, the Statutory Creditors' Committee and the United States Trustee for the Southern District of New York in the format specified by the U.S.T. Guidelines.

11. Since the commencement of this case, pursuant to the Administrative Order, S&F has provided the Debtor with monthly fee statements following the month for which compensation is sought. During the Final Compensation Period, S&F provided the Debtor with separate statements for the months of January and May, 2002, the two months included in the Final Compensation Period. With respect to such fee statement for the Final Compensation Period, S&F received payment totaling \$50,652.45. The unpaid portion of such fee statements, in the amount of \$11,223.18, is being sought in this Final Application.

### **SUMMARY OF SERVICES**

12. The services rendered by S&F to the Debtor during the Final Compensation Period were rendered in connection with an action entitled Sunbeam Corporation v. PricewaterhouseCoopers, LLP, Case No. CL005444AN, pending in the Circuit Court for the Fifteen Judicial Circuit, Palm Beach County, Florida (the "Pending Action"). The attorneys at S&F who

have rendered services to Debtor in the Pending action were admitted to practice by the aforesaid Court pro hac vice.

13. The Pending Action arises from consulting services which were performed by a predecessor of PricewaterhouseCoopers, LLP for the Debtor. The Complaint alleges that in performing those services, PricewaterhouseCoopers, LLP violated various legal duties which it owed to the Debtor.

14. At the outset of the Pending Action, the defendant moved to dismiss for failure to state a claim. That motion was denied by the Court. As a result of the Court's denial of the defendant's motion to dismiss, the Debtor was permitted to maintain the action. The action is still pending.

15. The services rendered by S&F to the Debtor during the Final Compensation Period in connection with the Pending Action consisted of: review of Sunbeam Corporation documents for determination of responsiveness and applicable privileges; production of documents; review of documents produced by the defendant; various communications with the Court in connection with discovery matters; preparation for depositions; and legal analysis of various claims and defenses. Such services are described in greater detail in Exhibit D to this Final Application.

16. The foregoing professional services performed by S&F were necessary and appropriate to the prosecution of the Pending Action, and were therefore in the best interests of the Debtor. Compensation for the foregoing services as requested is commensurate with the complexity, importance and nature of the issues and tasks involved. The professional services were performed with expedition and in an efficient manner.

17. The professional services performed by S&F on behalf of the Debtor during the Final Compensation Period required an aggregate of 253.20 hours by S&F's professionals and para-professionals. Of the aggregate time expended, 161.5 hours were expended by professionals, and the balance was expended by para-professionals.

18. During the Final Compensation Period, S&F's hourly billing rates for attorneys ranged from \$150 to \$500. The hourly billing rates for the attorneys who rendered services to the Debtor were \$450 and \$185. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable cases. As noted, attached hereto is a schedule listing each S&F professional and para-professional who performed services for Debtor during the Final Compensation Period, the hourly rate charged by S&F for services performed for each such individual and the aggregate number of hours and charges by each such individual.

**ACTUAL AND NECESSARY DISBURSEMENTS OF S&F**

19. As set forth in detail in Exhibit C, S&F has disbursed \$9,964.63 as actual and necessary expenses incurred in providing professional services to Debtor during the Final Compensation Period. These charges cover S&F's direct operating costs, which costs are not incorporated in the S&F hourly billing rates. Only clients who actually use services of the types set forth in Exhibit C are separately charged for such services. The effect of including such expenses as part of the hourly billing rates would impose that cost upon clients who do not require extensive photocopying and similar services.

20. As set forth in Exhibit C, the largest portion of the expense reimbursement sought -- \$7,746.00 out of the total -- is attributable to outside document services for which S&F contracted. Such services were necessary because of the large volume of document production

involved in the Pending Action. In view of the high speed copiers and dedicated personnel available from outside document service companies, it was both more efficient and more cost-effective to have such services performed by an outside company.

**THE REQUESTED COMPENSATION SHOULD BE ALLOWED**

21. Section 330 provides that a Court may award a professional employed under § 327 of the Bankruptcy Code “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 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, 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.

11 U.S.C. § 330(a)(3).

22. In the instant case, S&F respectfully submits that the services for which it seeks compensation in this Final Application were, at the time rendered, believed to be necessary for,

beneficial to, and in the best interests of the Debtor's estate. S&F further submits that the compensation requested herein is reasonable in light of the nature, extent and value of such services to the Debtor and its estate.

23. Whenever possible, as reflected in Exhibit B annexed to this Final Application, S&F sought to minimize the costs of S&F's services to the Debtor by utilizing junior attorneys and para-professionals to handle the more routine aspects of the Pending Action.

24. In sum, it is respectfully submitted that the services rendered by S&F were necessary and beneficial to the Debtor's estate, and were consistently performed in a timely manner commensurate with the complexity, importance, and nature of the issues involved, and that approval of the compensation sought herein is warranted.

#### **NOTICE**

25. Notice of this Final Application has been provided to the United States Trustee, the attorneys for the Statutory Creditors' Committee and the members of the Joint Fee Review Committee. S&F submits that no other or further notice need be provided.

#### **CONCLUSION**

WHEREFORE, S&F respectfully requests: (i) final allowance of compensation for professional services rendered during the Final Compensation Period in the amount of \$11,223.18; (ii) reimbursement for actual and necessary expenses which S&F incurred during the Final Compensation Period in the amount of \$9,964.63; and (iii) such other and further relief as the Court deems appropriate.

Dated: New York, New York  
February 5, 2003

/s/ Julian W. Friedman  
Julian W. Friedman (JF 6010)  
(A Member of the Firm)

STILLMAN & FRIEDMAN, P.C.  
425 Park Avenue  
New York, New York 10022  
(212) 223-0200

Litigation Counsel for Debtor

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
In re : Chapter 11 Case No.  
SUNBEAM CORPORATION, : 01-40291 (AJG)  
Debtor. :  
----- X

**CERTIFICATION UNDER GUIDELINES FOR  
FEES AND DISBURSEMENTS FOR PROFESSIONALS  
IN RESPECT OF APPLICATION OF STILLMAN &  
FRIEDMAN, P.C. FOR FINAL COMPENSATION AND  
REIMBURSEMENT OF EXPENSES**

I, Julian W. Friedman, hereby certify that:

1. I am a partner in the applicant firm, Stillman & Friedman, P.C. (“S&F”), with responsibility for the litigation in which my firm is representing the Debtor. I make this certification pursuant to 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”), 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 “U.S.T. Guidelines”) and the Order Pursuant to Sections 105(a) and 331 Establishing Procedures for

Compensation and Reimbursement of Expenses of Professionals (the “Administrative Order”) and, collectively with the Local Guidelines and the U.S.T. Guidelines, the “Guidelines”).

2. This certification is made in respect of S&F’s Final Application, dated February 5, 2003 (the “Application”), for compensation and reimbursement of expenses for the months of January, 2002 and May, 2002 (the “Final Compensation Period”) in accordance with the Guidelines.

3. In respect of 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 S&F and generally accepted by S&F’s clients; and
- d. in providing a reimbursable service, S&F does not make a profit on that service, whether the service is performed by S&F in-house or through a third party.

4. In respect of Section B.2 of the Local Guidelines and as required by the Administrative Order, I certify that S&F has complied with the provision requiring it to provide the Debtor, on a monthly basis, with a statement of S&F’s fees and disbursements accrued during the previous month.

5. In respect of Section B.3 of the Local Guidelines, I certify that counsel for the Statutory Creditors’ Committee, the United States Trustee for the Southern District of New York and the members of the Joint Fee Review Committee are each being provided with a copy of this Application.

Dated: New York, New York

February 5, 2003

/s/ Julian W. Friedman  
Julian W. Friedman (JF 6010)

## HOURS BILLED REPORT

In the matter of Sunbeam v. Price Waterhouse Coopers

Period of January 1-31, 2002

Name	Bar Admission	Hours Billed	Rate	Total Billed	Amount previously paid	Fees Sought in App.
<b>Partners</b>						
Julian W. Friedman	1969	28.70	\$450	\$12,915.00		
<b>Associates</b>						
Patience Atkin	2001	64.60	\$185	\$11,951.00		
<b>Paralegals</b>						
Scott Taylor		22.30	\$100	\$2,230.00		
Connie Winston		2.00	\$100	\$200.00		
Eric Lane		12.10	\$100	\$1,210.00		
Connie Winston (reproduction)		.50	\$25	\$12.50		
Don Glenn		1.30	\$25	\$32.50		
Disbursements				\$1,811.65		
<b>Total</b>				\$30,362.65	\$28,652.45	\$1,710.20

## HOURS BILLED REPORT

In the matter of Sunbeam v. Price Waterhouse Coopers

Period of May 1- 31, 2002

Name	Bar Admission	Hours Billed	Rate	Total Billed	Amount previously paid	Fees Sought in App.
<b>Partners</b>						
Julian W. Friedman	1969	4.70	\$550	\$2,585.00		
<b>Associates</b>						
Patience Atkin	2001	63.50	\$225	\$14,287.50		
<b>Paralegals</b>						
Scott Taylor		32.90	\$125	\$4,112.50		
Eric Lane		4.30	\$125	\$537.50		
Don Glenn		14.30	\$125	\$1,787.50		
Don Glenn (Reproduction)		2.00	\$25	\$50.00		
Disbursements				\$8,152.98		
<b>Total</b>				\$31,512.98	\$22,000.00	\$9,512.98

**DISBURSEMENTS BILLED REPORT**

**In the matter of Sunbeam v. Price Waterhouse Coopers**

**Period of January 1-31, 2002**

<b>EXPENSES</b>	<b>TOTAL</b>
Federal Express	\$45.67
Computerized legal research	\$582.98
Duplicating	\$1,120.75
Telecopy charges	\$6.00
Transportation	\$20.00
Conference and Business Meals	\$36.25
Total	\$1,811.65

**Period of May 1-31, 2002**

<b>EXPENSES</b>	<b>TOTAL</b>
Duplicating (Firm)	\$11.50
Printing and photostats (Outside)	\$5,500.00
Postage	\$0.57
Federal Express	\$214.81
Transportation	\$100.72
Conference and business meals	\$76.38
Telecopy charge	\$3.00
Outside Document Service	\$2,246.00
	\$8,152.98

Steven R. Isko, Esq.  
General Counsel  
Sunbeam Corp.  
2381 Executive Center Dr.  
Boca Raton, FL 33431

STATEMENT # 23280  
FEBRUARY 15, 2002  
FILE # 588-0010

PAGE

RE: Sunbeam v. Price Waterhouse Coopers

PROFESSIONAL SERVICES

01/02/02	JWF	Legal analysis	0.30	135.00
01/02/02	PEA	Telephone conversation with Dages re: SAP; research re: SAP	2.80	518.00
01/02/02	ST	Summation document management	1.50	150.00
01/03/02	PEA	Conference with Friedman; research re: standards	4.70	869.50
01/04/02	JWF	Legal analysis	0.20	90.00
01/04/02	PEA	Research re: consulting standards; conference with Friedman; telephone conversations with Giberson re: document production	3.30	610.50
01/04/02	ST	Data management Summation issues	1.00	100.00
01/07/02	ST	Work with Summation disk	1.00	100.00
01/07/02	JWF	Discovery	1.00	450.00
01/07/02	PEA	Review correspondence; review Coopers' internal memo	0.30	55.50
01/08/02	ST	Summation database work	2.00	200.00
01/08/02	JWF	Discovery	0.70	315.00
01/08/02	PEA	Review Coopers internal training memo; conference with Friedman; telephone conversation with Gibson and Friedman	1.20	222.00
01/09/02	JWF	Discovery	0.80	360.00
01/09/02	PEA	Conference with Taylor re: information management; conference with Friedman re: same; research; telephone conversation with Giberson	2.30	425.50
01/10/02	JWF	Prepare for depositions	2.80	1,260.00
01/10/02	PEA	Research re: consulting standards; conference with Easterly re: same	6.90	1,276.50

CONTINUED

01/11/02	JWF	Telephone conversation with co-counsel; discovery	3.80	1,710.00
01/11/02	PEA	Review Coopers documents; research re: consulting standards; review deposition outline memos; conference with Friedman re: consultant standards	4.00	740.00
01/14/02	JWF	Discovery	3.60	1,620.00
01/14/02	PEA	Telephone conversations with Taylor, computer Consultants; correspondence to Gibson re: information management	0.80	148.00
01/14/02	ST	Conference with Array technology and Kraft and Kennedy re: database	1.00	100.00
01/15/02	PEA	Telephone conversation with Giberson re: conference call; conference with Taylor re: information management; review client documents	4.00	740.00
01/15/02	ST	Summation review of disks	.80	80.00
01/16/02	JWF	Discovery; review documents	1.30	585.00
01/16/02	PEA	Telephone conversations with Friedman; review client documents; conferences with Taylor, Giberson re: documents	4.40	814.00
01/17/02	JWF	Participate in conference call with co-counsel and consultants; telephone conversation with Isko	0.90	405.00
01/17/02	PEA	Prepare for and participate in conference call with Friedman and co-counsel; review correspondence	1.60	296.00
01/18/02	CW	Prepare binders for Friedman and Atkins	2.00	200.00
01/18/02	CW	Reproduce documents	.50	12.50
01/21/02	JWF	Prepare for depositions	2.60	1,170.00
01/22/02	PEA	Telephone conversation with Giberson re: depositions	0.10	18.50
01/22/02	JWF	Prepare for depositions	0.30	135.00
01/23/02	JWF	Discovery	1.70	765.00
01/23/02	PEA	Review transcripts	2.20	407.00
01/23/02	EL	Reproduce documents	0.80	80.00
01/24/02	JWF	Prepare for depositions	2.30	1,035.00
01/24/02	PEA	Review transcripts	5.00	925.00
01/25/02	PEA	Review Taylor, Giberson, Manne re: documents; review transcripts and documents	6.00	1,110.00
01/25/02	JWF	Telephone conversations with client, co-counsel	0.80	360.00
01/25/02	ST	Summation document work	2.00	200.00
01/27/02	PEA	Review transcripts	4.00	740.00
01/28/02	PEA	Review transcripts	4.00	740.00
01/28/02	JWF	Prepare for testimony	2.30	1,035.00
01/28/02	ST	Summation related issues; document management	1.00	100.00
01/29/02	JWF	Discovery	2.00	900.00
01/29/02	PEA	Review documents	3.00	555.00
01/29/02	EL	Print out Sunbeam documents from Summation	6.30	630.00
01/29/02	ST	Summation database; conference call with Friedman,	6.00	600.00

CONTINUED

		Atkin and co-counsel		
01/30/02	PEA	Conferences with Friedman, Taylor, Manber, Giberson re: information management	0.70	129.50
01/30/02	JWF	Pre-trial discovery	1.30	585.00
01/30/02	EL	Print out documents from Summation program	4.20	420.00
01/30/02	ST	Summation disk loading	5.00	500.00
01/31/02	PEA	Review documents; conferences with Taylor re: document imaging	3.30	610.50
01/31/02	ST	Summation; computer solutions	1.00	100.00
01/31/02	EL	Print documents from Summation program	0.80	80.00
01/31/02	DG	Reproduce documents	1.30	32.50

Julian W. Friedman	28.70	12,915.00
Scott Taylor	22.30	2,230.00
Patience Atkin	64.60	11,951.00
Connie Winston	2.00	200.00
COPY/Winston	0.50	12.50
Eric Lane	12.10	1,210.00
COPY/Glenn	1.30	32.50

TOTAL HOURS		131.50	
TOTAL FEES			28,551.00

#### DISBURSEMENTS

01/31/02	Federal Express 1-21-02 invoice		45.67
01/31/02	Computerized Legal Research WESTLAW - DEC.		582.98
01/31/02	Reproduction JAN.		1,120.75
01/31/02	Telecopy charge JAN.		6.00
01/31/02	Transportation Petty Cash 1/02		20.00
01/31/02	Non Salary Overtime Expenses Various dinners 1/2-1/18/02		36.25

Reproduction	1,120.75
Federal Express	45.67
Telecopy charge	6.00
Transportation	20.00
Non Salary Overtime Expenses	36.25
Computerized Legal Research	582.98

CONTINUED

TOTAL DISBURSEMENTS	1,811.65
TOTAL STATEMENT	\$30,362.65

PER Stillman & Friedman, P.C.

Steven R. Isko, Esq.  
General Counsel  
Sunbeam Corp.  
2381 Executive Center Dr.  
Boca Raton, FL 33431

STATEMENT # 24030  
JUNE 15, 2002  
FILE # 588-0010

PAGE

RE: Sunbeam v. Price Waterhouse Coopers

PROFESSIONAL SERVICES

05/01/02	JWF	Telephone conversation with Mandel	0.30	165.00
05/01/02	PEA	Telephone conversation with Sweeton; conferences with Taylor re: information management	0.10	22.50
05/01/02	ST	Database review; scheduling meeting with David amber and Eric Christiansen re: network; meeting with Atkin	2.00	250.00
05/01/02	EL	Internet research	1.00	125.00
05/02/02	PEA	Conferences with Taylor, Giberson, Christiansen, Manber, Katsouris re: information management; conference with Lane re: travel; telephone conversation with Sweeton confirming McMinnville trip	1.50	337.50
05/02/02	ST	Database review; telephone calls with Mamber; VNC network setup	3.00	375.00
05/02/02	EL	Internet research	1.60	200.00
05/03/02	ST	Database set up/connection with Florida	1.00	125.00
05/03/02	EL	Internet research and telephone conversations	.50	62.50
05/06/02	PEA	Conference with Lane re: McMinnville trip	.10	22.50
05/06/02	ST	Database management; review calls to Array re: problems	1.00	125.00
05/06/02	EL	Travel arrangements for Atkin re: McMinnville	1.20	150.00
05/07/02	JWF	Telephone conversations with client, Giberson	.20	110.00
05/07/02	PEA	Review transcripts; prepare for McMinnville trip; participate in conference call with Friedman and	4.80	1,080.00

		Giberson re: interrogatory responses; conference with Taylor and Manber re: information management		
05/07/02	ST	Database review; telephone conversation with Mamber and Atkin; conference call to Florida with Guy Giberson	5.00	625.00
05/08/02	PEA	Telephone conversation with Giberson re: Waynesboro trip; review Kistol transcript	3.80	855.00
05/08/02	ST	Copy of database to hard drive and database review	2.00	250.00
05/10/02	PEA	Correspondence to Giberson	.10	22.50
05/10/02	ST	Database review	1.00	125.00
05/13/02	PEA	Telephone conversations with Sweeton; review documents for McMinnville trip; correspondence to Giberson; conferences with Taylor and DG re: document production	.50	112.50
05/13/02	ST	Database search	1.00	125.00
05/13/02	DG	Research	1.00	125.00
05/14/02	PEA	Telephone conversation with Giberson; review documents for McMinnville trip	1.60	360.00
05/14/02	ST	Testing; telephone conversation with David Mamber regarding VCN connection and Sunbeam database; searches re: McMinnville and report printing database search	3.00	375.00
05/14/02	DG	Research	4.00	500.00
05/15/02	JWF	Discovery	.20	110.00
05/15/02	PEA	Conferences with Taylor re: document review; conferences with DG re: same	.50	112.50
05/15/02	ST	Database review	2.00	250.00
05/15/02	DG	Research	3.00	375.00
05/16/02	ST	Document printout, research and database review, computer connection to Florida; problem solving	3.20	400.00
05/17/02	JWF	Prepare for discovery	.60	330.00
05/17/02	PEA	Document review; conference with Friedman re: McMinnville trip; conference with Giberson re: same	3.50	787.50
05/17/02	ST	Document printout; project management; computer solutions	1.50	187.50
05/17/02	DG	Research	3.00	375.00
05/17/02	DG	Reproduce documents	2.00	50.00
05/20/02	JWF	Document discovery	.60	330.00

05/20/02	PEA	Telephone conversations with Sweeton re: trip, Giberson re: same, Bogner re: Hattiesburg; prepare for trip; participate in conference call with Giberson, Mandel and Friedman	4.80	1,080.00
05/20/02	ST	Document printout and document search using summation	3.00	375.00
05/20/02	DG	Research	1.30	162.50
05/21/02	PEA	Prepare for McMinnville trip	2.90	652.50
05/21/02	PEA	[ONYC] travel to LaGuardia; travel to Nashville; drive to McMinnville	6.00	1,350.00
05/21/02	ST	Preparing Atkin for trip to McMinnville; document pulling	1.00	125.00
05/22/02	JWF	Telephone conversation with Atkin	.10	55.00
05/22/02	PEA	[ONYC] review documents; conduct employee interviews; draft memo to file re: interviews; conferences with Giberson re: plant visit	9.10	2,047.50
05/23/02	ST	Telephone conversation with Atkin re: documents to be copied/scanned by Indata shipped from McMinnville; prepare cover letter with documents; telephone conversations with Indata	1.30	162.50
05/23/02	PEA	[ONYC] review documents; conduct employee interviews; telephone conversations with Taylor, Indata Inc., re: document production; conferences with Giberson re: same; draft memos to file re: employee interviews	8.30	1,867.50
05/24/02	JWF	Discovery	.60	330.00
05/24/02	ST	Document and computer management	1.00	125.00
05/24/02	DG	Research	2.00	250.00
05/24/02	PEA	[ONYC] travel to Nashville and New York review notes; telephone conversations with Stallman; conference with Taylor	4.80	1,080.00
05/28/02	JWF	Telephone conversation with David Mandel; discovery	1.80	990.00
05/28/02	PEA	Conference with Friedman re: documents; telephone conversation with Mandel, Giberson re: interrogatories; review documents	3.70	832.50
05/29/02	JWF	Discovery letter	.30	165.00
05/29/02	PEA	Telephone conversations with Gross re: documents, employees re: document retention; document review	4.00	900.00
05/30/02	PEA	Telephone conversation with Anderson re: documents; review documents	2.50	562.50

05/30/02	ST	Conference with Atkin	.40	50.00
05/31/02	ST	Database management issues	.50	62.50
05/31/02	PEA	Review documents; telephone conversation with Giberson re: Hattiesburg and document retention	.90	202.50

Julian W. Friedman	4.70	\$2,585.00
Scott Taylor	32.90	4,112.50
Patience Atkin	63.50	14,287.50
Lane, Eric	4.30	537.50
Don Glenn	14.30	1,787.50
Copy/Glenn	2.00	50.00

TOTAL HOURS	121.70	
TOTAL FEES		23,360.00

#### DISBURSEMENTS

05/16/02	Transportation 5-10-02 invoice	12.90
05/16/02	Image Scanning Services/Consultation ArrayTech 4/02 services	2,246.00
05/29/02	Postage 5-10 to 5-16	.57
05/30/02	Federal Express 5-27 invoice	214.81
05/30/02	Reproduction 5-28 to 5-30	11.50
05/31/02	Transportation 5-31-02 invoice	41.82
05/31/02	Telecopy charge	3.00
05/31/02	Outside Reproduction Indata Corp. - 5/23/02 invoice	5,500.00
05/31/02	Non Salary Overtime Expenses 4/29 - 5/28/02 dinners	27.11
05/31/02	Transportation 05/31/02	12.00
05/31/02	Transportation 05/31/02	34.00
05/31/02	Non Salary Overtime Expenses 05/31/02 - dinners	49.27
	Reproduction	\$11.50
	Outside reproduction	5,500.00
	Postage	.57

Federal Express	214.81	
Telecopy charge	3.00	
Transportation	100.72	
Non Salary Overtime expenses	76.38	
Image Scanning Services/Consultation	2,246.00	
TOTAL DISBURSEMENTS		\$8,152.98
TOTAL STATEMENT		\$31,512.98

**AFFIDAVIT OF SERVICE BY MAIL**

STATE OF NEW YORK     )

ss.:

COUNTY OF NEW YORK    )

CHRISTINE NATOLI, being duly sworn, deposes and says that deponent is not a party to this action, is over 18 years of age and resides at 36 Fifth Street, Cresskill, New Jersey; that on the 5<sup>th</sup> day of February, 2003, deponent served the within Application of Stillman & Friedman, P.C., Litigation Counsel for Debtor, for Final Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses upon:

American Household, Inc. (formerly known as Sunbeam Corporation)  
2381 Executive Center Road  
Boca Raton, FL 33431  
Attn: Steven R. Isko, Esq.

Simpson Thacher & Bartlett  
425 Lexington Avenue  
New York, NY 10017  
Attn: Peter V. Pantaleo, Esq.  
Alice B. Eaton, Esq.

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

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

the address designated by said individual for that purpose, by depositing a true copy of same, enclosed in a properly addressed envelope, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.

/s/ Christine Natoli  
Christine Natoli

Sworn to before me this  
5<sup>th</sup> day of February, 2003

/s/ Julian W. Friedman  
Notary Public

Julian W. Friedman  
Notary Public, State of New York  
No. 31-9322756  
Qualified in New York County  
Commission Expires June 30, 2006