

Hearing Date: To Be Determined  
Objection Deadline: To Be Determined

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Capacity as Legal Representative for Future Asbestos  
Personal Injury Claimants

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

-----X  
)  
In re ) Chapter 11  
)  
MOTORS LIQUIDATION COMPANY, *et al.*, ) Case No. 09-50026 (REG)  
)  
f/k/a General Motors Corp., *et al.* )  
)  
Debtors. ) (Jointly Administered)  
-----X

**THIRD INTERIM AND FINAL APPLICATION OF ANALYSIS RESEARCH  
PLANNING CORPORATION AS ASBESTOS CLAIMS VALUATION CONSULTANT  
TO DEAN M. TRAFELET IN HIS CAPACITY AS LEGAL REPRESENTATIVE FOR  
FUTURE ASBESTOS PERSONAL INJURY CLAIMANTS FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE  
INTERIM PERIOD FROM OCTOBER 1, 2010 THROUGH MARCH 29, 2011  
AND THE FINAL PERIOD FROM MARCH 1, 2010 THROUGH MARCH 29, 2011**

**SUMMARY COVERSHEET TO THE SECOND INTERIM APPLICATION OF  
ANALYSIS RESEARCH PLANNING CORPORATION**

NAME OF APPLICANT:	Analysis Research Planning Corporation
AUTHORIZED TO PROVIDE SERVICES TO:	Dean M. Trafelet in his capacity as Legal Representative for Future Asbestos Personal Injury Claimants
DATE OF ENTRY OF ORDER OF APPOINTMENT:	April 21, 2010
PERIODS FOR WHICH COMPENSATION AND REIMBURSEMENT IS SOUGHT:	October 1, 2010 through March 29, 2011 (Third Interim Compensation Period)  March 1, 2010 through March 29, 2011 (Final Compensation Period)
TOTAL PROFESSIONAL FEES SOUGHT IN THE THIRD INTERIM APPLICATION:	\$536,458.00
TOTAL PROFESSIONAL FEES SOUGHT IN THE FINAL APPLICATION:	\$758,031.00
TOTAL EXPENSES SOUGHT IN THE THIRD INTERIM APPLICATION:	\$1,150.33
TOTAL EXPENSES SOUGHT IN THE FINAL APPLICATION:	\$2,007.55
TOTAL COMPENSATION SOUGHT IN THE THIRD INTERIM APPLICATION (FEES AND EXPENSES):	\$537,608.33
TOTAL COMPENSATION SOUGHT IN THE FINAL APPLICATION (FEES AND EXPENSES):	\$760,038.55
TOTAL PROFESSIONAL HOURS IN THE THIRD INTERIM APPLICATION:	5,327.50
TOTAL PROFESSIONAL HOURS IN THE FINAL APPLICATION:	6,624.80

BLENDED HOURLY RATE IN THE THIRD INTERIM APPLICATION: \$100.70

BLENDED HOURLY RATE IN THE FINAL APPLICATION: \$114.42

INTERIM OR FINAL APPLICATION: This is Applicant's third interim and final application for compensation.

### SUMMARY OF PRIOR APPLICATIONS

<b>Date Application Filed</b>	<b>Docket No.</b>	<b>Compensation Period</b>	<b>Fees Requested</b>	<b>Expenses Requested</b>	<b>Fees Allowed</b>	<b>Expenses Allowed</b>	<b>Holdback (if any)</b>
7/15/2010	6351	March 1, 2010 – May 30, 2010	\$16,034.50	\$0.00	\$16,034.50	\$0.00	\$1,603.45
11/15/2010	7748	June 1, 2010 – September 30, 2010	\$205,538.50	\$857.22	\$205,538.50	\$857.22	\$20,553.85

**SUMMARY OF HOURS BILLED BY PROFESSIONAL  
DURING THE THIRD INTERIM COMPENSATION PERIOD**

<b>Professional</b>	<b>Title</b>	<b>Year</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Fees</b>
Florence, Tom	President	2010	\$555.00	40.80	\$22,719.00
		2011	\$580.00		
Brockman, Amy	Vice President	2010	\$435.00	45.70	\$20,004.00
		2011	\$450.00		
Brophy, John	Vice President	2010	\$435.00	2.20	\$981.00
		2011	\$450.00		
Raab, Timothy	Managing Director	2011	\$285.00	2.50	\$712.50
Cryblsky, Todd	Director	2011	\$275.00	1.20	\$330.00
Macskasi, Zsolt	Director	2010	\$275.00	11.50	\$3,162.50
Oh, Andrew	Director	2010	\$250.00	22.20	\$5,612.00
		2011	\$260.00		
Wagoner, Jason	Director	2010	\$260.00	105.60	\$27,750.00
		2011	\$270.00		
Baker, Troy	Consultant	2011	\$85.00	228.60	\$19,431.00
Backhaus, Roland	Consultant	2010	\$85.00	42.50	\$3,612.50
Brands, Jonathan	Consultant	2010	\$85.00	379.60	\$32,266.00
		2011	\$85.00		
Brower, Nathan	Consultant	2011	\$260.00	23.90	\$6,214.00
Brown, Philip	Consultant	2010	\$125.00	64.50	\$8,297.50
		2011	\$130.00		

Bravo, Gabriela	Consultant	2010	\$85.00	93.00	\$7,905.00
		2011	\$85.00		
Burr, Aaron	Consultant	2010	\$85.00	664.70	\$56,499.50
		2011	\$85.00		
Case, Peter	Consultant	2010	\$85.00	140.50	\$11,942.50
Cirenza, Frances	Consultant	2010	\$85.00	50.00	\$4,250.00
Chanpong, Katherine	Consultant	2011	\$85.00	58.20	\$4,947.00
Connolly, Emma	Consultant	2011	\$85.00	133.20	\$11,322.00
Cox, Joyce	Consultant	2011	\$75.00	5.70	\$427.50
Eickemeyer, Jason	Consultant	2011	\$85.00	15.40	\$1,309.00
Gee, Will	Consultant	2010	\$85.00	41.00	\$3,485.00
		2011	\$85.00		
Geraci, Ben	Consultant	2010	\$85.00	195.60	\$16,702.50
		2011	\$85.00		
Hester, Clay	Consultant	2010	\$85.00	567.80	\$48,263.00
		2011	\$85.00		
Hogg, Seamus	Consultant	2011	\$85.00	19.50	\$1,657.50
Jones, Matt	Consultant	2010	\$85.00	232.90	\$19,756.50
		2011	\$85.00		
Knighton, Jeremy	Consultant	2010	\$85.00	66.00	\$56,010.00
Koretz, Phil	Consultant	2011	\$85.00	293.00	\$24,905.00
Kreger, James	Consultant	2010	\$150.00	199.10	\$30,225.00
		2011	\$155.00		
Kurkky, Brian	Consultant	2011	\$85.00	40.50	\$3,442.50

McTyre, Nick	Consultant	2011	\$85.00	15.00	\$1,275.00
Melikian, Lia	Consultant	2010	\$85.00	322.80	\$27,438.00
		2011	\$85.00		
Miller, Kevin	Consultant	2011	\$85.00	156.20	\$13,277.00
Molnar, Andras	Consultant	2011	\$240.00	1.10	\$264.00
Partridge, Diana	Consultant	2011	\$85.00	63.50	\$5,397.50
Patel, Monica	Consultant	2011	\$85.00	63.60	\$5,406.00
Potter, Lauren	Consultant	2011	\$85.00	76.40	\$6,494.00
Rajpal, Sanjay	Consultant	2011	\$85.00	81.90	\$6,961.50
Ross, Adam	Consultant	2011	\$85.00	64.20	\$5,457.00
Siegel, Molly	Consultant	2011	\$85.00	84.00	\$7,140.00
Shiffman, Jeffrey	Consultant	2010	\$85.00	80.00	\$6,800.00
		2011	\$85.00		
Smythe, Doug	Consultant	2011	\$85.00	61.90	\$5,261.50
Sperling, Coline	Consultant	2011	\$85.00	155.80	\$13,243.00
Tchoukleva, Ioana	Consultant	2011	\$85.00	246.30	\$20,935.50
Wetherald, Sarah	Consultant	2010	\$150.00	67.00	\$7,326.50
		2011	\$85.00		
<b>Grand Total:</b>				<b>5,327.50</b>	<b>\$536,458.00</b>
Blended Hourly Rate:					\$100.70

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**SUMMARY OF HOURS BILLED BY PROFESSIONAL  
DURING THE FINAL COMPENSATION PERIOD**

<b>Professional</b>	<b>Title</b>	<b>Year</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Fees</b>
Florence, Tom	President	2010	\$555.00	85.00	\$47,250.00
		2011	\$580.00		
Brockman, Amy	Vice President	2010	\$435.00	103.40	\$41,385.50
		2011	\$450.00		
Brophy, John	Vice President	2010	\$435.00	37.80	\$16,467.00
		2011	\$450.00		
Wingo, Gary	Vice-President	2010	\$435.00	6.40	\$2,784.00
Raab, Timothy	Managing Director	2011	\$285.00	55.10	\$15,177.50
Cryblsky, Todd	Director	2011	\$275.00	1.20	\$330.00
Macskasi, Zsolt	Director	2010	\$275.00	11.50	\$3,162.50
Oh, Andrew	Director	2010	\$250.00	35.20	\$8,862.00
		2011	\$260.00		
Wagoner, Jason	Director	2010	\$260.00	324.30	\$84,612.00
		2011	\$270.00		
Baker, Troy	Consultant	2011	\$85.00	228.60	\$19,431.00
Backhaus, Roland	Consultant	2010	\$85.00	118.30	\$10,055.50
Bixler, Devin	Consultant	2010	\$150.00	2.70	\$405.00
Brands, Jonathan	Consultant	2010	\$85.00	428.60	\$36,431.00
		2011	\$85.00		
Brower, Nathan	Consultant	2011	\$260.00	23.90	\$6,214.00



Brown, Philip	Consultant	2010	\$125.00	64.50	\$8,297.50
		2011	\$130.00		
Bravo, Gabriela	Consultant	2010	\$85.00	93.00	\$7,905.00
		2011	\$85.00		
Burr, Aaron	Consultant	2010	\$85.00	763.20	\$64,872.00
		2011	\$85.00		
Case, Peter	Consultant	2010	\$85.00	147.30	\$12,520.50
Cirenza, Frances	Consultant	2010	\$85.00	109.00	\$9,265.00
Chanpong, Katherine	Consultant	2011	\$85.00	58.20	\$4,947.00
Connolly, Emma	Consultant	2011	\$85.00	133.20	\$11,322.00
Cox, Joyce	Consultant	2011	\$75.00	5.70	\$427.50
Eickemeyer, Jason	Consultant	2011	\$85.00	15.40	\$1,309.00
Gee, Will	Consultant	2010	\$85.00	41.00	\$3,485.00
		2011	\$85.00		
Geraci, Ben	Consultant	2010	\$85.00	309.10	\$26,273.50
		2011	\$85.00		
Hester, Clay	Consultant	2010	\$85.00	684.60	\$58,191.00
		2011	\$85.00		
Hogg, Seamus	Consultant	2011	\$85.00	19.50	\$1,657.50
Jones, Matt	Consultant	2010	\$85.00	232.90	\$19,796.50
		2011	\$85.00		
Kahn, Karl	Consultant	2010	\$150.00	12.00	\$1,800.00
Kemper, Joseph	Consultant	2010	\$85.00	4.50	\$382.50
Knighton, Jeremy	Consultant	2010	\$85.00	66.00	\$5,610.00

Koretz, Phil	Consultant	2011	\$85.00	293.00	\$24,905.00
Kreger, James	Consultant	2010	\$150.00	253.40	\$38,370.00
		2011	\$155.00		
Kurkky, Brian	Consultant	2011	\$85.00	40.50	\$3,442.50
Lubert, Ryan	Consultant	2010	\$85.00	10.70	\$909.50
McTyre, Nick	Consultant	2011	\$85.00	15.00	\$1,275.00
Melikian, Lia	Consultant	2010	\$85.00	323.40	\$27,489.00
		2011	\$85.00		
Miller, Kevin	Consultant	2011	\$85.00	156.20	\$13,277.00
Molnar, Andras	Consultant	2011	\$240.00	12.40	\$2,863.00
Partridge, Diana	Consultant	2011	\$85.00	63.50	\$5,397.50
Patel, Monica	Consultant	2011	\$85.00	63.60	\$5,406.00
Potter, Lauren	Consultant	2011	\$85.00	76.40	\$6,494.00
Puthottu, Rachna	Consultant	2010	\$85.00	68.00	\$5,780.00
Rajpal, Sanjay	Consultant	2011	\$85.00	81.90	\$6,961.50
Ross, Adam	Consultant	2011	\$85.00	64.20	\$5,457.00
Rourke, Daniel	Consultant	2010	\$300.00	13.10	\$3,930.00
Samuelson, Talia	Consultant	2010	\$85.00	68.70	\$5,839.50
Siegel, Molly	Consultant	2011	\$85.00	84.00	\$7,140.00
Shiffman, Jeffrey	Consultant	2010	\$85.00	88.00	\$7,480.00
		2011	\$85.00		
Smythe, Doug	Consultant	2011	\$85.00	61.90	\$5,261.50
Sperling, Coline	Consultant	2011	\$85.00	155.80	\$13,243.00
Tchoukleva, Ioana	Consultant	2011	\$85.00	246.30	\$20,935.50

Wetherald, Sarah	Consultant	2010	\$150.00	162.20	\$15,418.50
		2011	\$85.00		
Yates, Chalisa	Consultant	2010	\$85.00	1.50	\$127.50
<b>Grand Total:</b>				<b>6,624.80</b>	<b>\$758,031.00</b>
Blended Hourly Rate:					\$114.42

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<b>Exhibit B</b>	Order Pursuant to Sections 105 and 1109 of the Bankruptcy Code Appointing Dean M. Trafelet as Legal Representative for Future Asbestos Personal Injury Claimants
<b>Exhibit C</b>	Order Granting Application of Dean M. Trafelet as Legal Representative for Future Asbestos Personal Injury Claimants to Retain and Employ Analysis, Research & Planning Corporation as Asbestos Claims Valuation Consultant as of March 1, 2010
<b>Exhibit D-1</b>	Summary of Professional Fees – Third Interim Compensation Period
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<b>Exhibit F-1</b>	Expense Summary – Third Interim Compensation Period
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<b>Exhibit G</b>	Monthly Invoices – Third Interim Compensation Period
<b>Exhibit H</b>	Certification of B. Thomas Florence in Support of the Third Interim and Final Application of Analysis Research Planning Corporation as Asbestos Claims Valuation Consultant to Dean M. Trafelet in His Capacity as Legal Representative for Future Asbestos Personal Injury Claimant for Allowance of Compensation and Reimbursement of Expenses Incurred for the Interim Period From October 1, 2010 Through March 29, 2011 and the Final Period From March 1, 2010 Through March 29, 2011

**THIRD INTERIM AND FINAL APPLICATION OF ANALYSIS RESEARCH  
PLANNING CORPORATION AS ASBESTOS CLAIMS VALUATION CONSULTANT  
TO DEAN M. TRAFELET IN HIS CAPACITY AS LEGAL REPRESENTATIVE FOR  
FUTURE ASBESTOS PERSONAL INJURY CLAIMANTS FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE  
INTERIM PERIOD FROM OCTOBER 1, 2010 THROUGH MARCH 29, 2011  
AND THE FINAL PERIOD FROM MARCH 1, 2010 THROUGH MARCH 29, 2011**

TO THE HONORABLE ROBERT E. GERBER  
UNITED STATES BANKRUPTCY JUDGE:

Analysis Research Planning Corporation (“**ARPC**”), asbestos claims valuation consultant to Dean M. Trafelet in his capacity as the legal representative for future asbestos personal injury claimants (the “**Future Claimants’ Representative**”) in the chapter 11 case of Motors Liquidation Company (f/k/a General Motors Corp.) (“**MLC**” or the “**Debtor**”) submits this application (the “**Application**”) for the allowance of compensation and reimbursement of expenses for the period from October 1, 2010 through March 29, 2011 (the “**Third Interim Compensation Period**”) and for the period from March 1, 2010 through March 29, 2011 (the “**Final Compensation Period**”) pursuant to 11 U.S.C. §§ 105, 330 and 331; Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”); Local Bankruptcy Rule 2016-1; and this Court’s *Order Pursuant to 11 U.S.C. §§ 105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* signed on August 7, 2009 (Docket No. 3711) (the “**Interim Compensation Order**”). In support hereof, ARPC respectfully shows this Court as follows:

**I.**  
**PRELIMINARY STATEMENT**

1. By this Application,<sup>1</sup> ARPC seeks approval of the sum of \$536,458.00 for services rendered during the Third Interim Compensation Period and \$1,150.33 for the reimbursement of expenses incurred in connection with the rendition of such services, for a total interim award of \$537,608.33. ARPC further seeks approval of the sum of \$758,031.00 for services rendered during the Final Compensation Period and \$2,007.55 for the reimbursement of expenses incurred in connection with the rendition of such services, for a total final award of \$760,038.55.

2. On July 15, 2010, ARPC filed the *First Interim Application of Analysis Research Planning Corporation as Asbestos Claims Valuation Consultant to Dean M. Trafelet in his Capacity as Legal Representative for Future Asbestos Personal Injury Claimants for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period from March 1, 2010 through May 31, 2010* (the “**First Interim Application**”) seeking allowance of \$16,034.50 in professional fees. On November 24, 2010 this Court entered its Order Granting, *inter alia*, Applications for Allowance of Interim Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred from February 1, 2010 through May 31, 2010 (Docket No. 7910), and awarded ARPC \$16,034.50 in professional fees, including a 10% holdback of \$1,603.45.

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<sup>1</sup> This Application has been prepared in accordance with the Interim Compensation Order, which is attached hereto as **Exhibit A**, the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases* (General Order M-389) dated November 25, 2009 (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, dated January 30, 1996 (the “**U.S. Trustee Guidelines**”).



3. On November 15, 2010, ARPC filed the *Second Interim Application of Analysis Research Planning Corporation as Asbestos Claims Valuation Consultant to Dean M. Trafelet in his Capacity as Legal Representative for Future Asbestos Personal Injury Claimants for Allowance of Interim Compensation and Reimbursement of Expenses for the Period from June 1, 2010 through September 30, 2010*, (the “**Second Interim Application**”) seeking allowance of \$205,538.50 in professional fees and reimbursement of expenses in the amount of \$857.22. On December 22, 2010, this Court entered its Order Granting, *inter alia*, Applications for Allowance of Interim Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred from June 1, 2010 through September 30, 2010 (Docket No. 8289), and awarded ARPC \$205,538.50 in professional fees, including a 10% holdback of \$20,553.85, and \$857.22 in reasonable expenses.

4. Other than the payments made by the Debtors to ARPC for fees incurred during the prior interim fee periods, and those payments if any, described below, which were made in accordance with this Court’s Interim Compensation Order, ARPC has not received payment of any compensation or reimbursement of expenses in this chapter 11 case. There is no agreement or understanding between ARPC and any other person for the sharing of compensation to be received for services rendered during the Debtors’ chapter 11 cases.

5. Pursuant to the terms of the Interim Compensation Order, ARPC, as indicated in the chart below, submitted six invoices for services rendered and reimbursement of expenses incurred during the Third Interim Compensation Period.

<b>Time Period Covered by Invoice</b>	<b>Fees Requested</b>	<b>Expenses Requested</b>	<b>Payment Received</b>
October 2010	\$101,400.50	\$0.00	\$81,020.40
November 2010	\$17,507.50	\$0.00	\$14,006.00
December 2010	\$50,756.50	\$1,150.00	\$41,755.53
January 2011	\$61,770.50	\$0.00	\$49,416.00
February 2011	\$116,987.50	\$0.00	\$0.00
March 2011 <sup>2</sup>	\$188,035.50	\$0.00	\$0.00
<b>Totals</b>	<b>\$536,458.00</b>	<b>\$1,150.00</b>	<b>\$186,197.83</b>

6. ARPC has received payments from the Debtors representing 80% of the fees and 100% of the expenses for services rendered and invoiced from October 2010 through January 2011. As of the date hereof, ARPC has not received any payments from the Debtors for fees and expenses related to services rendered during the period covered by its February and March 2011 invoices.<sup>3</sup> Thus, as of May 13, 2011, \$350,260.07 in requested fees and expenses remain unpaid.

7. Through this Application, ARPC seeks approval of all monthly fees and expenses that have been paid to date, as well as authorization to receive (i) any unpaid monthly fees and expenses on account of the above monthly invoices, and (ii) the twenty percent (20%) of its fees

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<sup>2</sup> In this Application, ARPC is only requesting approval of professional fees and expenses incurred through March 29, 2011, which is the date of confirmation of the Debtors' Second Amended Joint Chapter 11 Plan (Docket No. 9941). The initial March 2011 invoice submitted by ARPC pursuant to the Interim Compensation Order contained an error of excess fees in the amount of \$1,586.00. ARPC hereby submits a revised March 2011 invoice as part of the attached **Exhibit G**.

<sup>3</sup> ARPC has received no payment on its February or March 2011 invoices, and such invoices are currently the subject of informal objections raised by the Debtors that are currently pending and being negotiated.

previously held back from each of the invoices previously submitted in accordance with the Interim Compensation Order.

## **II.** **JURISDICTION AND VENUE**

8. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334, and the District Court's *Standing Order of Referral of Bankruptcy Cases to Bankruptcy Judges* dated July 10, 1984. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

## **III.** **BACKGROUND**

9. On June 1, 2009 (the "**Petition Date**"), Motors Liquidation Company (f/k/a General Motors Corporation) and several of its affiliates (collectively, the "**Debtors**") commenced this case under chapter 11 of the Bankruptcy Code.

10. On June 3, 2009, the United States Trustee appointed the Official Committee of Unsecured Creditors (the "**Creditors' Committee**"). (*See* Docket No. 356). Since that time the membership of the Creditors' Committee has been reconstituted twice. *See First Amended Appointment of the Official Committee of Unsecured Creditors* (Docket No. 4552); *see also Second Amended Appointment of the Official Committee of Unsecured Creditors* (Docket No. 5201).

11. On December 23, 2009, the Court appointed Brady C. Williamson as the Fee Examiner, pursuant to the Stipulation and Order with Respect to Appointment of a Fee Examiner (Docket No. 4708).

12. On March 2, 2010, the United States Trustee appointed the Official Committee of Unsecured Creditors Holding Asbestos Related Claims of Motors Liquidation Company (the

“**Asbestos Committee**”, and together with the Creditors’ Committee, the “**Committees**”)  
(Docket No. 5206).

13. On March 9, 2010, the Debtors filed their *Motion Pursuant to Sections 105 and 1109 of the Bankruptcy Code for an Order Appointing Dean M. Trafelet as Legal Representative for Future Asbestos Personal Injury Claimants* (the “**Appointment Motion**”) (Docket No. 5214) asking this Court to appoint the Future Claimants’ Representative to represent and protect the interests of holders of future asbestos personal injury claims against the Debtors (the “**Future Claimants**”). In the Appointment Motion, the Debtors’ stated that their intention to propose a plan of reorganization that will establish a trust to process and pay current and future asbestos personal injury claims against the Debtors. Pursuant to an order (the “**FCR Appointment Order**”), dated April 8, 2010, this Court approved Dean M. Trafelet’s appointment as the Future Claimants’ Representative (Docket No. 5459, attached hereto as **Exhibit B**).

14. On April 2, 2010, the Future Claimants’ Representative filed his *Application for Order Authorizing Legal Representative for Future Asbestos Claimants to Retain and Employ Analysis, Research & Planning Corporation as Asbestos Claims Valuation Consultant as of March 1, 2010* (Docket No. 5413).

15. By Order signed on April 21, 2010, this Court authorized the Future Claimants’ Representative to retain and employ ARPC as his asbestos claims valuation consultant effective as of March 1, 2010. A true and correct copy of the *Order Granting Application of Dean M. Trafelet as Legal Representative for Future Asbestos Personal Injury Claimants to Retain and Employ Analysis, Research & Planning Corporation as Asbestos Claims Valuation Consultant as of March 1, 2010* (the “**Retention Order**”) (Docket No. 5533) is attached hereto as **Exhibit C**.

16. Pursuant to the terms of the Retention Order, ARPC is authorized to seek compensation and reimbursement in accordance with the Interim Compensation Order under Sections 330 and 331 of the Bankruptcy Code.

**IV.**  
**STATUTORY BASIS FOR COMPENSATION**

17. The statutory predicates for the award of fees and expenses under the Application are Sections 330 and 331 of the Bankruptcy Code, as supplemented by Bankruptcy Rule 2016. Pursuant to Sections 330 and 331 of the Bankruptcy Code, ARPC seeks compensation for actual and necessary professional services rendered and for reimbursement of expenses incurred during the Second Interim Compensation Period.

18. Section 331 of the Bankruptcy Code provides as follows:

A trustee, examiner, a debtor’s attorney, or any other professional person employed under section 327 or 1103 of [the Bankruptcy Code] may apply to the court not more than once every 120 days after an order for relief in a case under this title, or more often if the court permits, for such compensation for services rendered before the date of such an application or reimbursement for expenses incurred before such date as is provided under section 330 of [the Bankruptcy Code]. After notice and a hearing, the court may allow and disburse to such applicant such compensation or reimbursement.

11 U.S.C. § 331.

19. Section 330 of the Bankruptcy Code authorizes the bankruptcy court to award an applicant, as counsel for a debtor, creditors’ committee or other professional employed pursuant to 11 U.S.C. § 327, reasonable compensation for its services and reimbursement of expenses.

Specifically, Section 330 of the Bankruptcy Code states, in relevant part, as follows:

(a)(1) After notice to the parties in interest and the United States Trustee and a hearing, and subject to sections 326, 328, and 329, the court may award to a trustee, ... or a professional person employed under section 327 or 1103—

(A) reasonable compensation for actual, necessary services rendered by the trustee, examiner, ombudsman, professional person, or attorney and by any paraprofessional person employed by any such person; and

(B) reimbursement for actual, necessary expenses.

11 U.S.C. § 330(a)(1).

20. Section 330(a)(3) provides that in determining the amount of reasonable compensation to be awarded, the court should consider the nature, extent and value of the services rendered to the estate, 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 [the Bankruptcy Code];

(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;

(E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

(F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under [the Bankruptcy Code].

11 U.S.C. § 330(a)(3)(A)-(F).

21. ARPC's request for compensation for professional services and reimbursement for expenses incurred on behalf of the Future Claimants' Representative and his constituents is reasonable.

22. ARPC agreed to provide asbestos claims valuation services to the Future Claimants' Representative at hourly rates for its professionals on the same basis and factors as are normally considered in determining fees. The rates charged are the normal hourly rates charged by ARPC for work performed in similar matters for clients for this consulting firm. ARPC represents and would demonstrate that its hourly rates for services performed in these proceedings are competitive and customary for the degree of skill and expertise required in the performance of similar services rendered by other professionals serving in a similar capacity. As required by the Local Guidelines and the U.S. Trustee Guidelines, the cover page of this Application includes a summary schedule of the hours expended by all ARPC professionals who rendered services to the Future Claimants' Representative during the Third Interim and Final Compensation Periods, showing their hourly billing rates and the total hours expended by each during the Third Interim and Final Compensation Periods.

23. All professionals rendering services in this case have made a deliberate effort to avoid any unnecessary duplication of work and time expended. ARPC represents that all services for which allowance of compensation is requested were performed on behalf of the Future Claimants' Representative and his constituents, and not on behalf of any committee, creditor or any other person. Furthermore, ARPC respectfully submits that the services for which it seeks compensation in this Application were, at the time rendered, believed to be necessary for and beneficial to the protection of the interests of the Future Claimants' Representative and his constituents. The services performed by ARPC were performed economically, effectively and efficiently, and the results obtained have benefited not only the Future Claimants, but also the Debtors, the Debtors' estate and other parties in interest.

Accordingly, the compensation requested herein is reasonable in light of the nature, extent and value of such services to the Future Claimants and the Debtors' estate.

24. For the Court's review, a summary containing the name of each professional providing services during the Third Interim Compensation Period, including the professional's standard hourly billing rate, the time expended, and the total value of services rendered during the Third Interim Compensation Period is attached hereto as **Exhibit D-1**. A summary containing the name of each professional providing services during the Final Compensation Period, including the professional's standard hourly billing rate, the time expended, and the total value of services rendered during the Final Compensation Period is attached hereto as **Exhibit D-2**.

25. A summary of the time expended by ARPC and the total value of professional services rendered identified by project task category during the Third Interim Compensation Period is attached hereto as **Exhibit E-1**. A summary of the time expended by ARPC and the total value of professional services rendered identified by project task category during the Final Compensation Period is attached hereto as **Exhibit E-2**.

26. Attached hereto as **Exhibit F-1** is a summary of the expenses incurred by ARPC during the Third Interim Compensation Period. Attached hereto as **Exhibit F-2** is a summary of the expenses incurred by ARPC during the Final Compensation Period.

27. Attached hereto as **Exhibit G** are ARPC's monthly invoices from the Third Interim Compensation Period that contain descriptions of the services rendered by ARPC on a daily basis. ARPC's invoices for the First and Second Interim Compensation Periods are attached to ARPC's First and Second Interim Applications (Docket Nos. 6351 and 7748) and are incorporated herein by reference.



**V.**  
**SUMMARY OF SERVICES RENDERED**

28. With respect to the time and labor expended by ARPC in this case during the Third Interim Compensation Period, as set forth in **Exhibits D-1 and E-1**, ARPC rendered professional services in the amount of \$536,458.00. With respect to the time and labor expended by ARPC in this case during the Final Compensation Period, as set forth in **Exhibits D-2 and E-2**, ARPC rendered professional services in the amount of \$758,031.00. ARPC believes that it is appropriate for it to be compensated for the time spent in connection with these matters, and sets forth a brief narrative description of the services rendered for or on behalf of the Future Claimants' Representative and his constituents, and the time expended, organized by project task categories, as follows:

**A. ASBESTOS CLAIMS VALUATION (C-02)**

29. During the Third Interim Compensation Period, ARPC performed extensive analytical work to assist the Future Claimants' Representative and his other professionals to estimate the value of future asbestos claims and negotiate a settlement under the Debtors' plan that would provide compensation to such future asbestos claims. These efforts culminated in the Court's entry of its *Stipulation and Order Fixing Asbestos Trust Claim and Resolving Debtors' Estimation Motion* (Docket No. 9214) (the "**Asbestos Settlement Stipulation**"). Following the entry of the Asbestos Settlement Stipulation, ARPC performed significant work to assist the Future Claimants' Representative and his other professionals with tasks related to the creation and start-up of the asbestos trust created under the Debtors' plan. ARPC also performed extensive analysis of documents produced by the Debtors during the period of time leading up to plan confirmation so as to protect the interests of the Future Claimants should the Debtors' plan have failed to have been confirmed.

30. Throughout the Final Compensation Period, ARPC continued to work with the Future Claimants' Representative and his other professionals to determine the information needed to identify, estimate, classify and value the asbestos-related liabilities of the Debtors. ARPC also worked with the Debtors, the Committees, and their respective professionals to analyze and resolve various issues relating to access to the Debtors' historical and current asbestos-related claims information, as well as various financial information pertinent to the Debtors' asbestos-related liabilities. ARPC assisted the Future Claimants' Representative and his counsel in the negotiation of various issues related to discovery sought by the Future Claimants' Representative, the Debtors and the Committees, including the negotiation of various confidentiality agreements and protocols for protecting the confidential information belonging to and the privacy of individual asbestos claimants. As additional information was made available by the Debtors, ARPC continued its review and analysis of the Debtors' asbestos-related liabilities. These activities allowed ARPC to assist the Future Claimants' Representative in his investigation into the Debtors' asbestos-related liabilities and will assist ARPC in the analysis and estimation of the claims in connection with the Debtors' plan of reorganization.

31. ARPC seeks compensation for 5,237.50 hours of reasonable and necessary professional fees incurred in the category of Asbestos Claims Valuation during the Third Interim Compensation Period in the total amount of \$536,458.00. ARPC seeks compensation for 6,624.00 hours of reasonable and necessary professional fees incurred in the category of Asbestos Claims Valuation during the Third Interim Compensation Period in the total amount of \$757,683.00.

**B. FEE/EMPLOYMENT APPLICATIONS (C-10)**

32. During the Final Compensation Period, ARPC reviewed, commented on and approved the Future Claimants' Representative's application to employ ARPC and the declaration of B. Thomas Florence in support of the application. These activities allowed the Future Claimants' Representative to file the necessary papers with the Court to retain and employ ARPC to assist him with his duties as the Future Claimants' Representative in this case.

33. ARPC seeks compensation for 0.80 hours of reasonable and necessary professional fees incurred in the category of Fee/Employment Applications during the Compensation Period in the total amount of \$348.00.

**VI.  
DISBURSEMENTS**

34. ARPC incurred out-of-pocket expenses in the amount of \$1,150.33 in connection with the services rendered during the Third Interim Compensation Period. A summary of the expenses incurred by ARPC during the Third Interim Compensation Period is set forth in **Exhibit F-1**. ARPC incurred out-of-pocket expenses in the amount of \$2,007.55 in connection with the services rendered during the Final Compensation Period. A summary of the expenses incurred by ARPC during the Final Compensation Period is set forth in **Exhibit F-2**.

35. These expenses are actual, necessary, out-of-pocket expenses which are not properly included in overhead, and arise exclusively from and are traceable to the services rendered by the Future Claimants' Representative in connection with these chapter 11 cases and were incurred for the benefit of the Future Claimants and are therefore, reimbursable by the estates. No allowable disbursement is treated as a "profit center" involving a markup over actual cost.

**VII.**  
**CONCLUSION**

36. The professional services summarized by this Application and rendered by ARPC were substantial and beneficial to the interests of the Future Claimants' Representative and his constituents.

37. The amounts sought by ARPC consist only of the actual and reasonable billable time expended by it and the actual and necessary expenses incurred by ARPC during the Second Interim Compensation Period.

38. The reasonable value of the professional services rendered by ARPC during the Third Interim Compensation Period is \$536,458.00 and the reasonable and necessary out-of-pocket expenses incurred by ARPC are \$1,150.33, for total allowable fees and expenses of \$537,608.33.

39. The reasonable value of the professional services rendered by ARPC during the Final Compensation Period is \$758,031.00 and the reasonable and necessary out-of-pocket expenses incurred by ARPC are \$2,007.55, for total allowable fees and expenses of \$760,038.55.

40. ARPC believes that the instant application and the description of services set forth herein of work performed are in compliance with the requirements of Local Bankruptcy Rule 2016-1, the Bankruptcy Code, the Local Guidelines and the U.S. Trustee Guidelines. As required by the Local Guidelines a true and correct copy of the Certification of B. Thomas Florence is attached hereto as **Exhibit H**.

*[remainder of page intentionally left blank]*

**WHEREFORE**, ARPC respectfully requests the entry of an order (a) awarding ARPC allowance of compensation for professional services in the amount of \$536,458.00 and reimbursement of expenses in the amount of \$1,150.33 for total compensation of \$537,608.33 during the Third Interim Compensation Period; (b) awarding ARPC allowance of compensation for professional services in the amount of \$758,031.00 and reimbursement of expenses in the amount of \$2,007.55 for total compensation of \$760,038.55 during the Final Compensation Period; (c) directing payment of the foregoing amounts to the extent that such amounts have not already been paid by the Debtors, and the 20% of professional fees that has been held back from each monthly invoice; and (d) granting ARPC such other and further relief as may be appropriate.

Dated: May 16, 2011  
Washington, D.C.

Respectfully submitted,

**ANALYSIS RESEARCH PLANNING  
CORPORATION**

By: /s/ B. Thomas Florence  
B. Thomas Florence

1220 19th Street, NW, Suite 700  
Washington, D.C. 20036

**Asbestos Claims Valuation Consultant to  
Dean M. Trafelet in his capacity as Legal  
Representative for Future Asbestos Personal Injury  
Claimants**

## **EXHIBIT A**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In re : Chapter 11 Case No.  
: :  
MOTORS LIQUIDATION COMPANY, *et al.*, : 09-50026 (REG)  
f/k/a General Motors Corp., *et al.* :  
Debtors. : (Jointly Administered)  
: :  
-----X

**ORDER PURSUANT TO 11 U.S.C. §§ 105(a) AND 331 ESTABLISHING  
PROCEDURES FOR INTERIM COMPENSATION AND  
REIMBURSEMENT OF EXPENSES OF PROFESSIONALS**

Upon the Motion, dated July 21, 2009 (the “**Motion**”),<sup>1</sup> of Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), pursuant to sections 105(a) and 331 of title 11, United States Code (the “**Bankruptcy Code**”) and Rule 2016(a) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), for entry of an order authorizing the establishment of certain procedures for interim compensation and reimbursement of professionals, all as more fully described in the Motion; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and upon the objection of the St. Regis Mohawk Tribe (the “**Tribe Objection**”) and the State of New York on behalf of the New York State Department of Environmental Conservation (the “**State Objection**,” and together with the Tribe Objection, the “**Objections**”) to the Motion; and upon the reply (the “**Reply**”) of Debtors to the Objections; and a hearing having been held to consider the relief requested in the Motion (the “**Hearing**”); and upon the record of the Hearing, and all of the proceedings had before the Court;

<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that, for the reasons set forth on the record of the Hearing, the Motion is granted as provided herein; and it is further

ORDERED that the Objections are hereby overruled in their entirety; provided, however, that the Debtors shall provide the St. Regis Mohawk Tribe (the “**Tribe**”) and the New York State Department of Environmental Conservation (the “**NYSDEC**”) with the Monthly Letter (as defined below); and it is further

ORDERED that except as may otherwise be provided in Court orders authorizing the retention of specific professionals, all professionals in this case may seek interim compensation in accordance with the following procedure:

- (a) Except as provided in paragraph (b) below, on or before the **30th day** of each month following the month for which compensation is sought, each professional seeking compensation will serve a monthly statement (the “**Monthly Statement**”), by hand or overnight delivery, on (i) the Debtors, Motors Liquidation Company, 300 Renaissance Center, Detroit, Michigan 48265 (Attn: Ted Stenger); (ii) the attorneys for the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Stephen Karotkin, Esq. and Joseph Smolinsky, Esq.); (iii) the attorneys for the Creditors’ Committee, Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq. and Robert Schmidt, Esq.); and (iv) the Office of the United States Trustee, 33 Whitehall Street, 22nd Floor, New York, New York 10004 (Attn: Diana G. Adams, Esq.) (collectively, the “**Notice Parties**”).
- (b) Each professional shall serve the Monthly Statement for the month of June 2009 on or before August 14, 2009.
- (c) The Monthly Statement shall not be filed with the Court and a courtesy copy need not be delivered to Chambers because this Motion is not intended to alter the fee application requirements outlined in sections 330



and 331 of the Bankruptcy Code. Professionals are still required to serve and file interim and final applications for approval of fees and expenses in accordance with the relevant provisions of the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules for the Southern District of New York.

- (d) Each Monthly Statement must contain a list of the individuals and their respective titles (e.g., attorney, paralegal, etc.) who provided services during the period covered by the Monthly Statement, their respective billing rates, the aggregate hours spent by each individual, a reasonably detailed breakdown of the disbursements incurred (no professional should seek reimbursement of an expense that would otherwise not be allowed pursuant to the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 dated January 30, 1996), and contemporaneously maintained time entries for each individual in increments of **tenths (1/10) of an hour** or as close thereto as practicable.<sup>2</sup>
- (e) Except as provided for in paragraph (f) below, each Notice Party shall have at least **15 days** after receipt of a Monthly Statement to review it and, if such party has an objection to the compensation or reimbursement sought in a particular Monthly Statement (an “**Objection**”), such party shall, by no later than the **45th day** following the month for which compensation is sought (the “**Objection Deadline**”), serve upon the professional whose Monthly Statement is objected to, and the other persons designated to receive statements in paragraph (a) above, a written “Notice of Objection to Fee Statement,” setting forth the nature of the Objection and the amount of fees or expenses at issue.
- (f) Each Notice Party shall have at least **15 days** after receipt of the Monthly Statement for June 2009 to review it and, if such party has an Objection, such party shall, by no later than the **60th day** following the end of the month of June 2009, serve upon the professional whose Monthly Statement is objected to, and the other persons designated to receive statements in paragraph (a) above, a written “Notice of Objection to Fee Statement,” setting forth the nature of the Objection and the amount of fees or expenses at issue.
- (g) At the expiration of the Objection Deadline, the Debtors shall promptly pay **80%** of the fees and **100%** of the expenses identified in each Monthly Statement to which no Objection has been served in accordance with paragraphs (e) and (f) above.

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<sup>2</sup> The Debtors may seek to modify this requirement in the retention application of certain professionals.

- (h) If the Debtors receive an Objection to a particular Monthly Statement, they shall withhold payment of that portion of the Monthly Statement to which the Objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth in paragraph (g) above.
- (i) If an Objection is resolved and if the party whose Monthly Statement was the subject of the Objection serves on all Notice Parties a statement indicating that the Objection has been withdrawn and describing in detail the terms of the resolution, then the Debtors shall promptly pay, in accordance with paragraph (g) above, that portion of the Monthly Statement that was withheld is no longer subject to the Objection.
- (j) All Objections that are not resolved by the parties shall be preserved and presented to the Court at the next interim or final fee application hearing to be heard by the Court in accordance with paragraph (l) below.
- (k) The service of an Objection in accordance with paragraph (f) above shall not prejudice the objecting party's right to object to any fee application made to the Court in accordance with the Bankruptcy Code on any ground, whether raised in the Objection or not. Furthermore, the decision by any party not to object to a Monthly Statement shall not be a waiver of any kind or prejudice that party's right to object to any fee application subsequently made to the Court in accordance with the Bankruptcy Code.
- (l) Commencing with the period ending September 30, 2009, and at four-month intervals thereafter (the "**Interim Fee Period**"), each of the retained professionals as set forth in paragraphs 3 and 4 herein (the "**Retained Professionals**") shall file with the Court an application (an "**Interim Fee Application**") for interim Court approval and allowance, pursuant to sections 330 and 331 of the Bankruptcy Code (as the case may be) of the compensation and reimbursement of expenses requested in the Monthly Statements served during such Interim Fee Period. Each Retained Professional shall file its Interim Fee Application no later than **45 days** after the end of the Interim Fee Period.
- (m) The Debtors' attorneys shall obtain a date from the Court for the hearing to consider Interim Fee Applications for all Retained Professionals (the "**Interim Fee Hearing**"). At least **30 days** prior to the Interim Fee Hearing, the Debtors' attorneys shall file a notice with the Court, with service upon the U.S. Trustee and all Retained Professionals, setting forth the time, date, and location of the Interim Fee Hearing, the period covered by the Interim Fee Applications, and the Objection Deadline. Any Retained Professional unable to file its own Interim Fee Application with the Court shall deliver to the Debtors' attorneys a fully executed copy with original signatures, along with service copies, three business days before the filing deadline. The Debtors' attorneys shall file and serve such Interim Fee Application.

- (n) Any Retained Professional who fails to timely file an Interim Fee Application seeking approval of compensation and expenses previously paid pursuant to a Monthly Statement shall be ineligible to receive further monthly payments of fees or reimbursement of expenses as provided herein until such Interim Fee Application is filed.
- (o) The pendency of an Interim Fee Application or a Court order that payment of compensation or reimbursement of expenses was improper as to a particular Monthly Statement shall not disqualify a Retained Professional from the future payment of compensation or reimbursement of expenses as set forth above, unless otherwise ordered by the Court.
- (p) Neither the payment of, nor the failure to pay, in whole or in part, monthly compensation and reimbursement as provided herein shall have any effect on this Court's interim or final allowance of compensation and reimbursement of expenses of any Retained Professionals.
- (q) The attorneys for the Creditors' Committee may, in accordance with the foregoing procedure for monthly compensation and reimbursement of professionals, collect and submit statements of expenses, with supporting vouchers, from members of the Creditors' Committee; *provided, however*, that these reimbursement requests must comply with this Court's Administrative Orders dated June 24, 1991 and April 21, 1995; and it is further
- (r) On or before the **30th day** of each month following the month for which compensation is sought, the Debtors will transmit a letter (the "**Monthly Letter**") to (i) the attorneys for the Tribe, McNamee, Lochner, Titus & Williams, P.C., 677 Broadway, Albany, New York 12207 (Attn: John J. Privitera Esq. and Jacob F. Lamme, Esq.) and (ii) the attorneys for the State of New York on behalf of the NYSDEC, New York State Department of Law Environmental Protection Bureau, The Capitol, Albany, New York 12224 (Attn: Maureen F. Leary, Assistant Attorney General) setting forth the aggregate fees and aggregate expenses for the period covered by the Monthly Letter for all retained professionals submitting Monthly Fee Statements. The Tribe and NYSDEC shall have no right to object to or otherwise challenge the Monthly Statements. The Monthly Letter is being provided for informational purposes only.

ORDERED that the Debtors shall include all payments to Retained Professionals on their monthly operating reports, detailed so as to state the amount paid to each Retained Professional; provided however, that amounts paid to Ordinary Course Professionals may be stated in the aggregate on any monthly operating reports; and it is further

ORDERED that all time periods set forth in this Order shall be calculated in accordance with Rule 9006(a) of the Federal Rules of Bankruptcy Procedure; and it is further

ORDERED that any and all other and further notice of the relief requested in the Motion shall be, and hereby is, dispensed with and waived; provided, however, that the Debtors shall serve a copy of this Order on each of the Retained Professionals; and it is further

ORDERED that notice of hearings to consider Interim Fee Applications and final fee applications shall be limited to the Notice Parties and any party who files a notice of appearance and requests notice in these chapter 11 cases; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York  
August 7, 2009

s/ Robert E. Gerber  
United States Bankruptcy Judge

## **EXHIBIT B**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In re : Chapter 11 Case No.  
: :  
MOTORS LIQUIDATION COMPANY, *et al.*, : 09-50026 (REG)  
f/k/a General Motors Corp., *et al.* :  
: :  
Debtors. : (Jointly Administered)  
: :  
-----X

**ORDER PURSUANT TO SECTIONS 105 AND 1109 OF THE  
BANKRUPTCY CODE APPOINTING DEAN M. TRAFELET AS LEGAL  
REPRESENTATIVE FOR FUTURE ASBESTOS PERSONAL INJURY CLAIMANTS**

Upon the Motion, dated March 8, 2010 (the “**Motion**”),<sup>1</sup> of Motors Liquidation Company (f/k/a General Motors Corporation) (“**MLC**”) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), pursuant to sections 105 and 1109 of title 11, United States Code (the “**Bankruptcy Code**”), for an Order appointing Dean M. Trafelet as Legal Representative for “**Future Claimants**” (as hereinafter defined), all as more fully described in the Motion; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be given; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Motion is granted as provided herein; and it is further

ORDERED that Dean M. Trafelet is hereby appointed as the legal representative (the “**Future Claimants’ Representative**”) of individuals who were exposed to asbestos or

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

asbestos-containing products that were manufactured, sold, supplied, produced, distributed, released, or marketed by any of the Debtors but who, prior to confirmation of a chapter 11 plan for MLC, have not manifested symptoms of asbestos-related diseases resulting from such exposure, whether such individuals are determined to have “claims” under section 101(5) of the Bankruptcy Code or “demands” within the meaning of section 524(g)(5) of the Bankruptcy Code (the “**Future Claimants**”); and it is further

ORDERED that the Future Claimants’ Representative shall have standing under section 1109(b) of the Bankruptcy Code to be heard as a party in interest in all matters relating to the Debtors’ chapter 11 cases, as appropriate, and the Future Claimants’ Representative shall have such powers and duties of a committee as set forth in section 1103 of the Bankruptcy Code as are appropriate for a Future Claimants’ Representative; and it is further

ORDERED that the Future Claimants’ Representative shall be compensated, at the rate of \$785 per hour and shall be entitled to reimbursement of reasonable and necessary expenses, in accordance with the Order Pursuant to 11 U.S.C. §§ 105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals (the “**Interim Compensation Order**”), entered by this Court on August 7, 2009 [Docket No. 3711], or such other orders as may be entered by the Court with respect compensation of professionals in these cases; and it is further

ORDERED that the Future Claimants’ Representative may employ attorneys and other professionals consistent with sections 105 and 327 of the Bankruptcy Code, subject to prior approval of this Court, and such professionals shall be subject to the terms of the Interim Compensation Order; and it is further

ORDERED that the Future Claimants’ Representative shall not be liable for any

damages, or have any obligations other than as prescribed by orders of this Court; *provided, however,* that the Future Claimants' Representative may be liable for damages caused by his willful misconduct or gross negligence. The Future Claimants' Representative shall not be liable to any person as a result of any action or omission taken or made by the Future Claimants' Representative in good faith. The Debtors shall indemnify, defend, and hold the Future Claimants' Representative harmless from any claims by any party against the Future Claimants' Representative arising out of or relating to the performance of his duties as Future Claimants' Representative; *provided, however,* that the Future Claimants' Representative shall not have such indemnification rights if a court of competent jurisdiction determines pursuant to a final and non-appealable order that the Future Claimants' Representative is liable upon such claim as a result of willful misconduct or gross negligence. If, before the earlier of (i) the entry of an order confirming a chapter 11 plan in MLC's chapter 11 case (that order having become a final order and no longer subject to appeal), and (ii) the entry of an order closing MLC's chapter 11 case, the Future Claimants' Representative believes that he is entitled to payment of any amounts by the Debtors on account of the Debtors' indemnification, contribution, and/or reimbursement obligations under this Order, including, without limitation, the advancement of defense costs, the Future Claimants' Representatives must file an application therefor in this Court and the Debtors may not pay any such amounts to the Future Claimants' Representative before the entry of an order by this Court approving the payment. The preceding sentence is intended to specify the period of time under which this Court shall have the jurisdiction over any request for fees and expenses by the Future Claimants' Representative for indemnification, contribution, or reimbursement and is not a limitation on the duration of the Debtors' obligation to indemnify the Future Claimants' Representative to the extent provided herein. In the event that a cause of



action is asserted against the Future Claimants' Representative arising out of or relating to the performance of his duties as Future Claimants' Representative, the Future Claimants' Representative shall have the right to choose his own counsel; and it is further

ORDERED that the Future Claimants' Representative and its counsel shall be entitled to receive all notices and pleadings which are served upon the Unsecured Creditors' Committee pursuant to any and all orders entered in these chapter 11 cases, including, without limitation, the Interim Compensation Order; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: *April 8, 2010*  
New York, New York

*s/ Robert E. Gerber*  
UNITED STATES BANKRUPTCY JUDGE

## **EXHIBIT C**

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

-----X  
In re )  
 ) Chapter 11  
 )  
MOTORS LIQUIDATION COMPANY, *et al.*, ) Case No. 09-50026 (REG)  
 )  
 )  
f/k/a General Motors Corp., *et al.* )  
 )  
Debtors. ) (Jointly Administered)  
-----X

**ORDER GRANTING APPLICATION OF DEAN M. TRAFELET AS LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS PERSONAL INJURY CLAIMANTS TO RETAIN AND EMPLOY ANALYSIS, RESEARCH & PLANNING CORPORATION AS ASBESTOS CLAIMS VALUATION CONSULTANT AS OF MARCH 1, 2010**

Upon the Application, dated April 2, 2010 (the “**Application**”),<sup>1</sup> of Dean M. Trafelet as legal representative for future asbestos personal injury claimants (the “**Future Claimants’ Representative**”), pursuant to sections 105(a), 327(a) and 1103 of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), for entry of an order authorizing the employment of Analysis, Research & Planning Corporation (“ARPC”) as Asbestos Claims Valuation Consultant for the Future Claimants’ Representative, effective as March 1, 2010; and upon the Declaration of B. Thomas Florence, President and a Principal of ARPC, attached to the Application as Exhibit B (the “**Florence Declaration**”); and the Court being satisfied, based upon the representations made in the Application and the Florence Declaration, that ARPC is “disinterested” as such term is defined in Section 101(14) of the Bankruptcy Code and that ARPC represents no interest adverse to the Debtors’ estates with respect to the matters upon which it is to be engaged; and the Court having jurisdiction to consider the

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to such terms in the Motion.

Application and the relief requested therein in accordance with 28 U.S.C §§ 157 and 1334 and the Standing Order M-61 Referring to Bankruptcy Judges for the Southern District of New York Any and All Proceedings Under Title 11, dated July 10, 1984 (Ward, Acting C.J.); and consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Application is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore; it is

ORDERED that the Application is granted as provided herein; and it is further

ORDERED that pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a), the Future Claimants' Representative is authorized to employ and retain ARPC as his asbestos claims valuation consultant in this chapter 11 case in accordance with ARPC's normal hourly rates and disbursement policies, all as contemplated by the Application, effective as of March 1, 2010 is approved; and it is further

ORDERED that ARPC shall be compensated in accordance with the standards and procedures set forth in Sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, and the Order Pursuant to Section 105(a) and 331 of the Bankruptcy Code Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, entered by this Court on August 7, 2009, or such other orders as may be entered by the Court with respect to compensation of professionals in these cases; and it is further

ORDERED that notice of this Application as provided herein and therein shall be deemed good and sufficient notice of the Application; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York  
April 21, 2010

s/ Robert E. Gerber  
ROBERT E. GERBER  
UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT D-1**

**EXHIBIT D-1****SUMMARY OF HOURS BILLED BY ARPC  
FOR THE THIRD INTERIM COMPENSATION PERIOD  
FROM OCTOBER 1, 2010 THROUGH MARCH 29, 2011**

<b>Professional</b>	<b>Title</b>	<b>Year</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Fees</b>
Florence, Tom	President	2010	\$555.00	40.80	\$22,719.00
		2011	\$580.00		
Brockman, Amy	Vice President	2010	\$435.00	45.70	\$20,004.00
		2011	\$450.00		
Brophy, John	Vice President	2010	\$435.00	2.20	\$981.00
		2011	\$450.00		
Raab, Timothy	Managing Director	2011	\$285.00	2.50	\$712.50
Cryblsky, Todd	Director	2011	\$275.00	1.20	\$330.00
Macskasi, Zsolt	Director	2010	\$275.00	11.50	\$3,162.50
Oh, Andrew	Director	2010	\$250.00	22.20	\$5,612.00
		2011	\$260.00		
Wagoner, Jason	Director	2010	\$260.00	105.60	\$27,750.00
		2011	\$270.00		
Baker, Troy	Consultant	2011	\$85.00	228.60	\$19,431.00
Backhaus, Roland	Consultant	2010	\$85.00	42.50	\$3,612.50
Brands, Jonathan	Consultant	2010	\$85.00	379.60	\$32,266.00
		2011	\$85.00		
Brower, Nathan	Consultant	2011	\$260.00	23.90	\$6,214.00
Brown, Philip	Consultant	2010	\$125.00	64.50	\$8,297.50
		2011	\$130.00		

Bravo, Gabriela	Consultant	2010	\$85.00	93.00	\$7,905.00
		2011	\$85.00		
Burr, Aaron	Consultant	2010	\$85.00	664.70	\$56,499.50
		2011	\$85.00		
Case, Peter	Consultant	2010	\$85.00	140.50	\$11,942.50
Cirenza, Frances	Consultant	2010	\$85.00	50.00	\$4,250.00
Chanpong, Katherine	Consultant	2011	\$85.00	58.20	\$4,947.00
Connolly, Emma	Consultant	2011	\$85.00	133.20	\$11,322.00
Cox, Joyce	Consultant	2011	\$75.00	5.70	\$427.50
Eickemeyer, Jason	Consultant	2011	\$85.00	15.40	\$1,309.00
Gee, Will	Consultant	2010	\$85.00	41.00	\$3,485.00
		2011	\$85.00		
Geraci, Ben	Consultant	2010	\$85.00	195.60	\$16,702.50
		2011	\$85.00		
Hester, Clay	Consultant	2010	\$85.00	567.80	\$48,263.00
		2011	\$85.00		
Hogg, Seamus	Consultant	2011	\$85.00	19.50	\$1,657.50
Jones, Matt	Consultant	2010	\$85.00	232.90	\$19,756.50
		2011	\$85.00		
Knighton, Jeremy	Consultant	2010	\$85.00	66.00	\$56,010.00
Koretz, Phil	Consultant	2011	\$85.00	293.00	\$24,905.00
Kreger, James	Consultant	2010	\$150.00	199.10	\$30,225.00
		2011	\$155.00		
Kurkky, Brian	Consultant	2011	\$85.00	40.50	\$3,442.50



McTyre, Nick	Consultant	2011	\$85.00	15.00	\$1,275.00
Melikian, Lia	Consultant	2010	\$85.00	322.80	\$27,438.00
		2011	\$85.00		
Miller, Kevin	Consultant	2011	\$85.00	156.20	\$13,277.00
Molnar, Andras	Consultant	2011	\$240.00	1.10	\$264.00
Partridge, Diana	Consultant	2011	\$85.00	63.50	\$5,397.50
Patel, Monica	Consultant	2011	\$85.00	63.60	\$5,406.00
Potter, Lauren	Consultant	2011	\$85.00	76.40	\$6,494.00
Rajpal, Sanjay	Consultant	2011	\$85.00	81.90	\$6,961.50
Ross, Adam	Consultant	2011	\$85.00	64.20	\$5,457.00
Siegel, Molly	Consultant	2011	\$85.00	84.00	\$7,140.00
Shiffman, Jeffrey	Consultant	2010	\$85.00	80.00	\$6,800.00
		2011	\$85.00		
Smythe, Doug	Consultant	2011	\$85.00	61.90	\$5,261.50
Sperling, Coline	Consultant	2011	\$85.00	155.80	\$13,243.00
Tchoukleva, Ioana	Consultant	2011	\$85.00	246.30	\$20,935.50
Wetherald, Sarah	Consultant	2010	\$150.00	67.00	\$7,326.50
		2011	\$85.00		
<b>Grand Total:</b>				<b>5,327.50</b>	<b>\$536,458.00</b>
Blended Hourly Rate:					\$100.70

**EXHIBIT D-2**

**EXHIBIT D-2****SUMMARY OF HOURS BILLED BY ARPC  
FOR THE FINAL COMPENSATION PERIOD FROM  
MARCH 1, 2010 THROUGH MARCH 29, 2011**

<b>Professional</b>	<b>Title</b>	<b>Year</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Fees</b>
Florence, Tom	President	2010	\$555.00	85.00	\$47,250.00
		2011	\$580.00		
Brockman, Amy	Vice President	2010	\$435.00	103.40	\$41,385.50
		2011	\$450.00		
Brophy, John	Vice President	2010	\$435.00	37.80	\$16,467.00
		2011	\$450.00		
Wingo, Gary	Vice-President	2010	\$435.00	6.40	\$2,784.00
Raab, Timothy	Managing Director	2011	\$285.00	55.10	\$15,177.50
Cryblsky, Todd	Director	2011	\$275.00	1.20	\$330.00
Macskasi, Zsolt	Director	2010	\$275.00	11.50	\$3,162.50
Oh, Andrew	Director	2010	\$250.00	35.20	\$8,862.00
		2011	\$260.00		
Wagoner, Jason	Director	2010	\$260.00	324.30	\$84,612.00
		2011	\$270.00		
Baker, Troy	Consultant	2011	\$85.00	228.60	\$19,431.00
Backhaus, Roland	Consultant	2010	\$85.00	118.30	\$10,055.50
Bixler, Devin	Consultant	2010	\$150.00	2.70	\$405.00
Brands, Jonathan	Consultant	2010	\$85.00	428.60	\$36,431.00
		2011	\$85.00		
Brower, Nathan	Consultant	2011	\$260.00	23.90	\$6,214.00

Brown, Philip	Consultant	2010	\$125.00	64.50	\$8,297.50
		2011	\$130.00		
Bravo, Gabriela	Consultant	2010	\$85.00	93.00	\$7,905.00
		2011	\$85.00		
Burr, Aaron	Consultant	2010	\$85.00	763.20	\$64,872.00
		2011	\$85.00		
Case, Peter	Consultant	2010	\$85.00	147.30	\$12,520.50
Cirenza, Frances	Consultant	2010	\$85.00	109.00	\$9,265.00
Chanpong, Katherine	Consultant	2011	\$85.00	58.20	\$4,947.00
Connolly, Emma	Consultant	2011	\$85.00	133.20	\$11,322.00
Cox, Joyce	Consultant	2011	\$75.00	5.70	\$427.50
Eickemeyer, Jason	Consultant	2011	\$85.00	15.40	\$1,309.00
Gee, Will	Consultant	2010	\$85.00	41.00	\$3,485.00
		2011	\$85.00		
Geraci, Ben	Consultant	2010	\$85.00	309.10	\$26,273.50
		2011	\$85.00		
Hester, Clay	Consultant	2010	\$85.00	684.60	\$58,191.00
		2011	\$85.00		
Hogg, Seamus	Consultant	2011	\$85.00	19.50	\$1,657.50
Jones, Matt	Consultant	2010	\$85.00	232.90	\$19,796.50
		2011	\$85.00		
Kahn, Karl	Consultant	2010	\$150.00	12.00	\$1,800.00
Kemper, Joseph	Consultant	2010	\$85.00	4.50	\$382.50
Knighton, Jeremy	Consultant	2010	\$85.00	66.00	\$5,610.00

Koretz, Phil	Consultant	2011	\$85.00	293.00	\$24,905.00
Kreger, James	Consultant	2010	\$150.00	253.40	\$38,370.00
		2011	\$155.00		
Kurkky, Brian	Consultant	2011	\$85.00	40.50	\$3,442.50
Lubert, Ryan	Consultant	2010	\$85.00	10.70	\$909.50
McTyre, Nick	Consultant	2011	\$85.00	15.00	\$1,275.00
Melikian, Lia	Consultant	2010	\$85.00	323.40	\$27,489.00
		2011	\$85.00		
Miller, Kevin	Consultant	2011	\$85.00	156.20	\$13,277.00
Molnar, Andras	Consultant	2011	\$240.00	12.40	\$2,863.00
Partridge, Diana	Consultant	2011	\$85.00	63.50	\$5,397.50
Patel, Monica	Consultant	2011	\$85.00	63.60	\$5,406.00
Potter, Lauren	Consultant	2011	\$85.00	76.40	\$6,494.00
Puthottu, Rachna	Consultant	2010	\$85.00	68.00	\$5,780.00
Rajpal, Sanjay	Consultant	2011	\$85.00	81.90	\$6,961.50
Ross, Adam	Consultant	2011	\$85.00	64.20	\$5,457.00
Rourke, Daniel	Consultant	2010	\$300.00	13.10	\$3,930.00
Samuelson, Talia	Consultant	2010	\$85.00	68.70	\$5,839.50
Siegel, Molly	Consultant	2011	\$85.00	84.00	\$7,140.00
Shiffman, Jeffrey	Consultant	2010	\$85.00	88.00	\$7,480.00
		2011	\$85.00		
Smythe, Doug	Consultant	2011	\$85.00	61.90	\$5,261.50
Sperling, Coline	Consultant	2011	\$85.00	155.80	\$13,243.00
Tchoukleva, Ioana	Consultant	2011	\$85.00	246.30	\$20,935.50

Wetherald, Sarah	Consultant	2010	\$150.00	162.20	\$15,418.50
		2011	\$85.00		
Yates, Chalisa	Consultant	2010	\$85.00	1.50	\$127.50
<b>Grand Total:</b>				<b>6,624.80</b>	<b>\$758,031.00</b>
Blended Hourly Rate:					\$114.42

**EXHIBIT E-1**

**EXHIBIT E-1****COMPENSATION BY PROJECT CATEGORY  
FOR THE THIRD INTERIM COMPENSATION PERIOD FROM  
OCTOBER 1, 2010 THROUGH MARCH 29, 2011**

	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
1	Asbestos Issues	—	—
2	Asbestos Claims Valuation	5,237.50	\$536,458.00
3	Asset Analysis and Recovery	—	—
4	Asset Disposition	—	—
5	Business Operations	—	—
6	Case Administration	—	—
7	Claims Administration and Objections	—	—
8	Employee Benefits/Pensions	—	—
9	Executory Contracts/Unexpired Leases	—	—
10	Fee/Employment Applications	—	—
11	Fee/Employment Objections	—	—
12	Financing/Cash Collateral	—	—
13	Hearings	—	—
14	Litigation	—	—
15	Nonworking Travel	—	—
16	Meetings of Creditors	—	—
17	Plan and Disclosure Statement	—	—
18	Relief from Stay Proceedings	—	—
	<b>TOTAL</b>	<b>5,237.50</b>	<b>\$536,458.00</b>



**EXHIBIT E-2**

**EXHIBIT E-2****COMPENSATION BY PROJECT CATEGORY  
FOR THE FINAL COMPENSATION PERIOD FROM  
MARCH 1, 2010 THROUGH MARCH 29, 2011**

	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
1	Asbestos Issues	—	—
2	Asbestos Claims Valuation	6,624.00	\$757,683.00
3	Asset Analysis and Recovery	—	—
4	Asset Disposition	—	—
5	Business Operations	—	—
6	Case Administration	—	—
7	Claims Administration and Objections	—	—
8	Employee Benefits/Pensions	—	—
9	Executory Contracts/Unexpired Leases	—	—
10	Fee/Employment Applications	0.80	\$348.00
11	Fee/Employment Objections	—	—
12	Financing/Cash Collateral	—	—
13	Hearings	—	—
14	Litigation	—	—
15	Nonworking Travel	—	—
16	Meetings of Creditors	—	—
17	Plan and Disclosure Statement	—	—
18	Relief from Stay Proceedings	—	—
	<b>TOTAL</b>	<b>6,624.80</b>	<b>\$758,031.00</b>

**EXHIBIT F-1**

**EXHIBIT F-1****EXPENSE SUMMARY  
FOR THE THIRD INTERIM COMPENSATION PERIOD FROM  
OCTOBER 1, 2010 THROUGH MARCH 29, 2011**

<b>EXPENSE CATEGORY</b>	<b>TOTAL EXPENSES</b>
<b>Photocopying</b>	
a. Internal Photocopying	—
b. External Photocopying	—
<b>Telecommunications</b>	
a. Toll Charges	—
b. Facsimile	—
<b>Courier and Freight</b>	—
<b>Printing</b>	—
<b>Court Reporter and Transcripts</b>	—
<b>Messenger Service</b>	—
<b>Computerized Research</b>	—
<b>Out of Town Travel Expenses</b>	
a. Airfare	—
b. Hotel	\$651.83
c. Meals	—
d. Cabs/Parking	\$48.50
e. Mileage	—
f. Rental Car	—
<b>Word Processing, Secretarial and other Staff Services</b>	—
<b>Overtime Expenses</b>	
a. Non-Professional	—
b. Professional	—
<b>Local Meals</b>	—
<b>Local Transportation</b>	\$450.00
<b>Court Call / Telephonic Hearing Costs</b>	—
<b>Filing Fees</b>	—
<b>Total</b>	<b>\$1,150.33</b>

**EXHIBIT F-2**

**EXHIBIT F-2****EXPENSE SUMMARY  
FOR THE FINAL COMPENSATION PERIOD FROM  
MARCH 1, 2010 THROUGH MARCH 29, 2011**

<b>EXPENSE CATEGORY</b>	<b>TOTAL EXPENSES</b>
<b>Photocopying</b>	
a. Internal Photocopying	—
b. External Photocopying	—
<b>Telecommunications</b>	
a. Toll Charges	—
b. Facsimile	—
<b>Courier and Freight</b>	—
<b>Printing</b>	—
<b>Court Reporter and Transcripts</b>	—
<b>Messenger Service</b>	—
<b>Computerized Research</b>	\$857.22
<b>Out of Town Travel Expenses</b>	
a. Airfare	—
b. Hotel	\$651.83
c. Meals	—
d. Cabs/Parking	\$48.50
e. Mileage	—
f. Rental Car	—
<b>Word Processing, Secretarial and other Staff Services</b>	
<b>Overtime Expenses</b>	
a. Non-Professional	—
b. Professional	—
<b>Local Meals</b>	—
<b>Local Transportation</b>	\$450.00
<b>Court Call / Telephonic Hearing Costs</b>	—
<b>Filing Fees</b>	—
<b>Total</b>	<b>\$2,007.55</b>

## **EXHIBIT G**



220 19th Street, NW, Suite 700  
Washington, DC 20036

Invoice to:
Dean Trafelet General Motors (GM) 50 W. Schiller St. Chicago, IL 60610

Invoice #	Date	Amount Due
18113	11/23/2010	\$101,400.50

For professional services rendered by Analysis.Research.Planning Corp. (ARPC) during the period October 2010.

Item	Description	Amount
<b>Claims Analysis</b>		
	Prepare and edit database(s)	\$3,379.00
	Historical data analysis	\$9,448.50
		<b>\$12,827.50</b>
<b>Claim Forecast(s)</b>		
	Data analysis - model building	\$3,201.50
		<b>\$3,201.50</b>
<b>Review Case Documents and Materials</b>		
	Document review and comment	\$79,207.50
		<b>\$79,207.50</b>
<b>Prepare/Attend Calls/Meetings</b>		
	Counsel/client meetings/calls	\$522.00
		<b>\$522.00</b>
<b>Actuarial Analysis</b>		
	Historical data analysis - model building	\$2,479.50
	Forecast Methodology	\$3,162.50
		<b>\$5,642.00</b>
<b>Total Amount Due for this Invoice:</b>		<b>\$101,400.50</b>

Detailed fee and expense information is attached. If you have any questions regarding this invoice, please call Joy Rothwell at (202) 797-1111. Thank you.



## Professional by Project

	Rate	Hours	Amount
<b>Claims Analysis</b>			
Florence, Tom	\$555.00	10.70	\$5,938.50
Oh, Andrew	\$250.00	10.50	\$2,625.00
Wagoner, Jason	\$260.00	16.40	\$4,264.00
			<b>\$12,827.50</b>
<b>Claim Forecast(s)</b>			
Florence, Tom	\$555.00	5.30	\$2,941.50
Wagoner, Jason	\$260.00	1.00	\$260.00
			<b>\$3,201.50</b>
<b>Review Case Documents and Materials</b>			
Backhaus, Roland	\$85.00	42.50	\$3,612.50
Brands, Jonathan	\$85.00	103.50	\$8,797.50
Bravo, Gabriela	\$85.00	4.00	\$340.00
Brown, Philip	\$125.00	17.50	\$2,187.50
Burr, Aaron	\$85.00	150.50	\$12,792.50
Case, Peter	\$85.00	116.60	\$9,911.00
Cirenza, Frances	\$85.00	50.00	\$4,250.00
Gee, Will	\$85.00	6.50	\$552.50
Geraci, Ben	\$85.00	103.50	\$8,797.50
Hester, Clay	\$85.00	92.00	\$7,820.00
Knighton, Jeremy	\$85.00	44.00	\$3,740.00
Kreger, James	\$150.00	70.90	\$10,635.00
Melikian, Lia	\$85.00	34.90	\$2,966.50
Shiffman, Jeffrey	\$85.00	1.00	\$85.00
Wagoner, Jason	\$260.00	1.00	\$260.00
Wetherald, Sarah	\$150.00	16.40	\$2,460.00
			<b>\$79,207.50</b>
<b>Prepare/Attend Calls/Meetings</b>			
Brockman, Amy	\$435.00	1.20	\$522.00
			<b>\$522.00</b>
<b>Actuarial Analysis</b>			
Brockman, Amy	\$435.00	5.70	\$2,479.50
Macskasi, Zsolt	\$275.00	11.50	\$3,162.50
			<b>\$5,642.00</b>

Professional Fees (detail)

Claims Analysis				
Date	Staff Member	Description	Hours	Charges
<b>Historical data analysis</b>				
09/03/10	Tom Florence	Analysis of settlement summaries	3.50	1,942.50
10/05/10	Jason Wagoner	Zero pay rate and average indemnity calculations for different exposure type groups by year and disease.	2.00	520.00
10/06/10	Tom Florence	Analysis of hard copy claim data	2.30	1,276.50
10/07/10	Tom Florence	Additional analysis of hard copy claim data	4.90	2,719.50
10/19/10	Jason Wagoner	Name matching of deposition/complaint document review to Bates White sample meso claims.	2.50	650.00
10/20/10	Jason Wagoner	Name matching of deposition/complaint document review to ARPC sample meso claims (2 hrs). Comparison of matching results to Bates White sample match. (0.5 hrs)	2.50	650.00
10/21/10	Jason Wagoner	Revisions to doc review data (2.5 hrs). Re-matching doc review to meso samples on first and last name. (1.5 hrs).	4.00	1,040.00
10/22/10	Jason Wagoner	Matching complaint/deposition document review to meso claim samples. (1 hr) Review of match quality. (1 hr) Review of duplicate name matches (0.5 hrs)	2.50	650.00
			<b>24.20</b>	<b>9,448.50</b>
<b>Prepare and edit database(s)</b>				
10/04/10	Jason Wagoner	Perform database validation.	2.90	754.00
10/04/10	Andrew Oh	Work on document review issues (.20 hrs); claimant database building (.20 hrs)	0.40	100.00
10/05/10	Andrew Oh	Additional review of document issues (.70 hrs); continuation of claimant database building (.70 hrs)	1.40	350.00
10/06/10	Andrew Oh	Further review of document issues (.40 hrs); additional claimant database building (.10 hrs)	0.50	125.00
10/07/10	Andrew Oh	Continued reviewing document issues (2.30 hrs); continued claimant database building (2 hrs)	4.30	1,075.00
10/14/10	Andrew Oh	Continued claims database building	1.40	350.00
10/18/10	Andrew Oh	Claim database standardization/formatting (.50 hrs); continued with reviewing document issues (.40hrs)	0.90	225.00
10/26/10	Andrew Oh	Document review (.30 hrs) and data research (.30 hrs)	0.60	150.00
10/27/10	Andrew Oh	More document review (.50 hrs) and data research (.50 hrs)	1.00	250.00
			<b>13.40</b>	<b>3,379.00</b>
		<b>Total Fees for Claims Analysis:</b>	<b>37.60</b>	<b>12,827.50</b>
<b>Claim Forecast(s)</b>				
Date	Staff Member	Description	Hours	Charges
<b>Data analysis - model building</b>				
10/08/10	Jason Wagoner	Revised forecast using Nicholson 1982 incidence model.	1.00	260.00
10/13/10	Tom Florence	Review of preliminary forecast assumptions	2.80	1,554.00
10/21/10	Tom Florence	Review of preliminary forecast results	2.50	1,387.50
			<b>6.30</b>	<b>3,201.50</b>
		<b>Total Fees for Claim Forecast(s):</b>	<b>6.30</b>	<b>3,201.50</b>
<b>Review Case Documents and Materials</b>				
Date	Staff Member	Description	Hours	Charges
<b>Document review and comment</b>				
10/01/10	Sarah Wetherald	Continued to review case specific interrogatory responses and deposition	3.50	525.00

Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
		transcripts for GM sites and products.		
10/01/10	Jonathan Brands	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	6.00	510.00
10/01/10	Gabriela Bravo	Reviewed case specific interrogatory responses and deposition transcripts for GM sites and products.	0.50	42.50
10/01/10	Peter Case	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	3.00	255.00
10/01/10	Aaron Burr	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	7.00	595.00
10/01/10	James Kreger	Continued to review GM claimant complaints and depositions.	3.70	555.00
10/01/10	Clay Hester	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	4.00	340.00
10/04/10	Peter Case	Continued to review case specific interrogatory responses, deposition transcripts, and court documents for GM sites and products.	9.00	765.00
10/04/10	Sarah Wetherald	Continued to review GM complaint and deposition documents.	0.30	45.00
10/04/10	Ben Geraci	Continued to Review Case Specific Deposition and Interrogatory Response Transcripts for GM Sites and Products.	8.20	697.00
10/04/10	Aaron Burr	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	8.00	680.00
10/04/10	James Kreger	Continued to review case depositions and documents for data relevant to claims analysis	0.80	120.00
10/04/10	Jonathan Brands	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	8.00	680.00
10/04/10	Clay Hester	Reviewed case specific depositions and interrogatory response transcripts for GM sites and products.	9.80	833.00
10/04/10	Frances Cirenza	Continued to Review Case Specific Deposition and Interrogatory Response Transcripts for GM Sites and Products.	5.00	425.00
10/05/10	Jonathan Brands	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	7.00	595.00
10/05/10	Peter Case	Continued to review case specific interrogatory responses, deposition transcripts, and court documents for GM sites and products.	11.00	935.00
10/05/10	Aaron Burr	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	8.00	680.00
10/05/10	Clay Hester	Continued to Review Case Specific Deposition and Interrogatory Response Transcripts for GM Sites and Products.	8.70	739.50
10/05/10	Roland Backhaus	Reviewed case specific interrogatory responses and deposition transcripts for GM sites and products.	4.00	340.00
10/05/10	James Kreger	Continued to review case depositions and documents in connection with claims analysis	5.00	750.00
10/05/10	Frances Cirenza	Continued to Review Case Specific Deposition and Interrogatory Response Transcripts for GM Sites and Products.	5.00	425.00
10/05/10	Ben Geraci	Continued to Review Case Specific Deposition and Interrogatory Response Transcripts for GM Sites and Products.	8.80	748.00
10/05/10	Sarah Wetherald	Continued to review GM complaint and deposition documents.	1.50	225.00
10/06/10	Peter Case	Continued to review case specific interrogatory responses, deposition transcripts, and court documents for GM sites and products.	8.60	731.00
10/06/10	Frances Cirenza	Continued to Review Case Specific Deposition and Interrogatory Response Transcripts for GM Sites and Products.	2.00	170.00
10/06/10	James Kreger	Continued to review case depositions and documents in connection with claims analysis	2.00	300.00

Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
10/06/10	Ben Geraci	Continued to Review Case Specific Deposition and Interrogatory Response Transcripts for GM Sites and Products.	1.00	85.00
10/06/10	Clay Hester	Continued to Review Case Specific Complaints for GM Sites and Products.	7.50	637.50
10/06/10	Sarah Wetherald	Continued to review GM complaint and deposition documents.	2.00	300.00
10/06/10	Jonathan Brands	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	8.00	680.00
10/06/10	Ben Geraci	Continued to Review Case Specific Deposition and Interrogatory Response Transcripts for GM Sites and Products.	8.00	680.00
10/06/10	Aaron Burr	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	6.00	510.00
10/07/10	Peter Case	Continued to review case specific interrogatory responses, deposition transcripts, and court documents for GM sites and products.	5.00	425.00
10/07/10	James Kreger	Continued to review case depositions and documents in connection with claims analysis	0.50	75.00
10/07/10	Sarah Wetherald	Continued to review GM complaint and deposition documents.	3.50	525.00
10/07/10	Jonathan Brands	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	8.00	680.00
10/07/10	Aaron Burr	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	6.00	510.00
10/07/10	Ben Geraci	Continued to Review Case Specific Deposition and Interrogatory Response Transcripts for GM Sites and Products.	8.00	680.00
10/07/10	Clay Hester	Continued to Review Case Specific Complaints for GM Sites and Products.	8.50	722.50
10/08/10	Aaron Burr	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	7.00	595.00
10/08/10	Jonathan Brands	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	7.00	595.00
10/08/10	Peter Case	Continued to review case specific interrogatory responses, deposition transcripts, and court documents for GM sites and products.	1.90	161.50
10/08/10	James Kreger	Continued to review case depositions and documents in connection with claims analysis	7.20	1,080.00
10/08/10	Clay Hester	Continued to Review Case Specific Complaints for GM Sites and Products.	3.50	297.50
10/08/10	Ben Geraci	Continued to Review Case Specific Deposition and Interrogatory Response Transcripts for GM Sites and Products.	6.00	510.00
10/09/10	Peter Case	Continued to review case specific interrogatory responses, deposition transcripts, and court documents for GM sites and products.	9.10	773.50
10/11/10	Clay Hester	Continued to review Case Specific Complaints for GM Sites and Products.	5.00	425.00
10/11/10	Jonathan Brands	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	2.00	170.00
10/11/10	Peter Case	Continued to review case specific interrogatory responses, deposition transcripts, and court documents for GM sites and products.	3.00	255.00
10/11/10	Frances Cirenza	Continued to review case specific interrogatory responses, deposition transcripts, and court documents for GM sites and products.	1.00	85.00
10/12/10	Peter Case	Continued to review case specific interrogatory responses, deposition transcripts, and court documents for GM sites and products.	7.80	663.00
10/12/10	Frances Cirenza	Continued to review case specific interrogatory responses, deposition transcripts, and court documents for GM sites and products.	5.00	425.00
10/12/10	Clay Hester	Continued to review Case Specific Complaints for GM Sites and Products.	8.50	722.50

Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
10/12/10	Ben Geraci	Continued to review case specific complaints for GM sites and products.	8.00	680.00
10/12/10	Jonathan Brands	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products.	5.00	425.00
10/12/10	Aaron Burr	Standardized case specific interrogatory responses and deposition transcripts for GM sites and products.	8.00	680.00
10/13/10	Peter Case	Continued to review case specific interrogatory responses, deposition transcripts, and court documents for GM sites and products.	8.10	688.50
10/13/10	James Kreger	Continued to review case depositions and documents in connection with claims analysis.	6.00	900.00
10/13/10	Aaron Burr	Continued to standardize case specific interrogatory responses and deposition transcripts for GM sites and products.	8.00	680.00
10/14/10	James Kreger	Continued to review case depositions and documents in connection with claims analysis.	2.50	375.00
10/18/10	Roland Backhaus	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	1.90	161.50
10/18/10	Ben Geraci	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	4.00	340.00
10/18/10	Aaron Burr	Reviewed and indexed case specific interrogatory responses and deposition transcripts for GM sites and products.	1.00	85.00
10/18/10	Peter Case	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	4.20	357.00
10/18/10	James Kreger	Continued to review GM case documents in connection with claims analysis.	4.50	675.00
10/18/10	Jonathan Brands	Reviewed case specific depositions and complaints for GM sites, products and damages.	2.50	212.50
10/18/10	Philip Brown	Reviewed and catalogued formal complaint documents.	1.00	125.00
10/19/10	Ben Geraci	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	4.00	340.00
10/19/10	Clay Hester	Reviewed Case Specific Deposition Transcripts for GM Sites and Products.	6.00	510.00
10/19/10	Jason Wagoner	Review of summary of deposition and complaint document review.	1.00	260.00
10/19/10	Ben Geraci	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	4.00	340.00
10/19/10	Aaron Burr	Continued to review and index case specific interrogatory responses and deposition transcripts for GM sites and products.	8.00	680.00
10/19/10	Roland Backhaus	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	7.30	620.50
10/19/10	James Kreger	Continued to review GM case documents for data relevant to claims analysis	1.30	195.00
10/19/10	Jeremy Knighton	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	6.00	510.00
10/19/10	Jonathan Brands	Reviewed case specific depositions and complaints for GM sites, products and damages.	8.50	722.50
10/19/10	Peter Case	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	10.80	918.00
10/19/10	Philip Brown	Additional review and cataloging formal complaint documents.	8.50	1,062.50
10/20/10	Roland Backhaus	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	4.70	399.50

Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
10/20/10	Jeremy Knighton	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	8.00	680.00
10/20/10	Aaron Burr	Continued to review and index case specific interrogatory responses and deposition transcripts for GM sites and products.	7.50	637.50
10/20/10	Lia Melikian	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	2.00	170.00
10/20/10	Ben Geraci	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	8.00	680.00
10/20/10	Clay Hester	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	7.00	595.00
10/20/10	James Kreger	Continued to review GM case documents in connection with claims analysis.	2.50	375.00
10/20/10	Gabriela Bravo	Continued to standardize case specific interrogatory responses and deposition transcripts for GM sites and products.	2.50	212.50
10/20/10	Peter Case	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	6.00	510.00
10/20/10	Will Gee	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	3.50	297.50
10/20/10	Jonathan Brands	Further review of case specific depositions and complaints for GM sites, products and damages.	9.50	807.50
10/20/10	Frances Cirenza	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	6.00	510.00
10/20/10	Philip Brown	Continued to review and catalog formal complaint documents.	7.00	875.00
10/21/10	Jeffrey Shiffman	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	1.00	85.00
10/21/10	Philip Brown	Continued to review and catalog formal complaint documents.	1.00	125.00
10/21/10	Aaron Burr	Standardized case specific interrogatory responses and deposition transcripts for GM sites and products.	8.00	680.00
10/21/10	Roland Backhaus	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	4.30	365.50
10/21/10	Ben Geraci	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	6.50	552.50
10/21/10	Gabriela Bravo	Continued to standardize case specific interrogatory responses and deposition transcripts for GM sites and products.	1.00	85.00
10/21/10	Jeremy Knighton	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	8.00	680.00
10/21/10	Frances Cirenza	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	5.00	425.00
10/21/10	Jonathan Brands	Continued to Review case specific depositions and complaints for GM sites, products and damages.	7.00	595.00
10/21/10	Peter Case	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	6.60	561.00
10/21/10	James Kreger	Continued to review GM case documents for relevance to claims analysis.	8.00	1,200.00
10/21/10	Lia Melikian	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	8.00	680.00
10/21/10	Will Gee	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	3.00	255.00
10/21/10	Clay Hester	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	8.50	722.50

Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
10/22/10	Jeremy Knighton	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	6.00	510.00
10/22/10	James Kreger	Continued to review GM case documents for relevance to claims analysis.	1.00	150.00
10/22/10	Sarah Wetherald	Reviewed case documents for injured party information.	2.60	390.00
10/22/10	Ben Geraci	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	7.50	637.50
10/22/10	Roland Backhaus	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	5.50	467.50
10/22/10	Clay Hester	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	7.00	595.00
10/22/10	Aaron Burr	Continued to standardize case specific interrogatory responses and deposition transcripts for GM sites and products.	7.00	595.00
10/22/10	Lia Melikian	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	8.50	722.50
10/23/10	Aaron Burr	Continued to research case specific interrogatory responses and deposition transcripts for GM sites and products.	13.00	1,105.00
10/24/10	Aaron Burr	Continued to research case specific interrogatory responses and deposition transcripts for GM sites and products.	12.50	1,062.50
10/25/10	Clay Hester	Continued to Review Case Specific Complaints for GM Sites and Products.	1.00	85.00
10/25/10	Lia Melikian	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	6.00	510.00
10/25/10	Ben Geraci	Reviewed Complaints for information pertaining to General Motors' liability in asbestos cases.	8.00	680.00
10/25/10	Frances Cirenza	Continued to review complaint documents for GM site and product information.	10.00	850.00
10/25/10	Peter Case	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products	7.50	637.50
10/25/10	Aaron Burr	Continued to research case specific interrogatory responses and deposition transcripts for GM sites and products.	8.00	680.00
10/25/10	Roland Backhaus	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	6.80	578.00
10/25/10	James Kreger	Continued to review GM case documents for data relevance of claims analysis.	6.20	930.00
10/25/10	Sarah Wetherald	Reviewed complaint documents for GM site and product information.	3.00	450.00
10/25/10	Jonathan Brands	Continued reviewing case specific depositions and complaints for GM sites, products and damages.	8.00	680.00
10/25/10	Jeremy Knighton	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	7.00	595.00
10/26/10	Clay Hester	Continued to Review Case Specific Complaints for GM Sites and Products.	6.50	552.50
10/26/10	Jonathan Brands	Continued reviewing case specific depositions and complaints for GM sites, products and damages.	9.00	765.00
10/26/10	Peter Case	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products	7.80	663.00
10/26/10	Aaron Burr	Continued to research case specific interrogatory responses and deposition transcripts for GM sites and products.	8.00	680.00
10/26/10	Lia Melikian	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	8.20	697.00

Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
<b>Document review and comment</b>				
10/26/10	Ben Geraci	Continued to review complaint documents for GM site and product information.	7.50	637.50
10/26/10	Roland Backhaus	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	8.00	680.00
10/26/10	Frances Cirenza	Continued to review complaint documents for GM site and product information.	5.00	425.00
10/26/10	James Kreger	Continued to review GM case documents in connection with claims analysis.	5.50	825.00
10/26/10	Jeremy Knighton	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products.	9.00	765.00
10/27/10	Frances Cirenza	Continued to review complaint documents for GM site and product information.	6.00	510.00
10/27/10	Clay Hester	Continued to Review Case Specific Complaints for GM Sites and Products.	0.50	42.50
10/27/10	James Kreger	Continued to review GM case documents in connection with claims analysis.	5.00	750.00
10/27/10	Ben Geraci	Continued to review complaint documents for GM site and product information.	6.00	510.00
10/27/10	Lia Melikian	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products.	2.20	187.00
10/27/10	Aaron Burr	Continued to research case specific interrogatory responses and deposition transcripts for GM sites and products.	8.00	680.00
10/27/10	Peter Case	Continued to Review Case Specific Deposition Transcripts for GM Sites and Products	7.20	612.00
10/27/10	Jonathan Brands	Continued reviewing case specific depositions and complaints for GM sites, products and damages.	8.00	680.00
10/28/10	Aaron Burr	Continued to research case specific interrogatory responses and deposition transcripts for GM sites and products.	8.00	680.00
10/28/10	James Kreger	Continued to review GM case documents for data relevant to claim analysis.	4.00	600.00
10/29/10	Aaron Burr	Continued to research case specific interrogatory responses and deposition transcripts for GM sites and products.	3.50	297.50
10/29/10	James Kreger	Continued to review GM case documents for data relevant to claim analysis.	5.20	780.00
			<b>854.80</b>	<b>79,207.50</b>
<b>Total Fees for Review Case Documents and Materials:</b>			<b>854.80</b>	<b>79,207.50</b>

Prepare/Attend Calls/Meetings				
Date	Staff Member	Description	Hours	Charges
<b>Counsel/client meetings/calls</b>				
10/05/10	Amy Brockman	Call with D. Trafelet to discuss W. Boggett and progress of coding of discovery documents.	0.50	217.50
10/08/10	Amy Brockman	Call to discuss status of railroad claimants and additional research.	0.50	217.50
10/15/10	Amy Brockman	Call with S. Esserman re status of data analysis.	0.20	87.00
			<b>1.20</b>	<b>522.00</b>
<b>Total Fees for Prepare/Attend Calls/Meetings:</b>			<b>1.20</b>	<b>522.00</b>

Actuarial Analysis				
Date	Staff Member	Description	Hours	Charges
<b>Forecast Methodology</b>				
09/07/10	Zsolt Macskasi	Research regarding mesothelioma incidence forecasting	0.40	110.00



Actuarial Analysis				
Date	Staff Member	Description	Hours	Charges
<b>Forecast Methodology</b>				
09/08/10	Zsolt Macskasi	Additional research regarding mesothelioma incidence forecasting	0.50	137.50
09/09/10	Zsolt Macskasi	Review and analysis of SEER registries.	0.80	220.00
09/10/10	Zsolt Macskasi	Review SEER data in connection with claims analysis	0.60	165.00
09/13/10	Zsolt Macskasi	Analyze SEER data.	0.60	165.00
09/14/10	Zsolt Macskasi	Review ARPC Peto model.	0.30	82.50
09/14/10	Zsolt Macskasi	Further analysis of most recent SEER data files regarding cancer registries.	0.20	55.00
09/15/10	Zsolt Macskasi	Further analysis of SEER mesothelioma incidence data and characteristics	0.20	55.00
09/16/10	Zsolt Macskasi	Additional review of HSE methodology for forecasting mesothelioma claims	0.40	110.00
09/17/10	Zsolt Macskasi	Additional review and comparisons of forecasting methods identified in research	0.60	165.00
09/20/10	Zsolt Macskasi	Analyze issues related to claims forecasting and data	0.70	192.50
09/21/10	Zsolt Macskasi	Start coding HSE (Hodgson) model	0.40	110.00
09/24/10	Zsolt Macskasi	Continue coding HSE model	0.40	110.00
09/27/10	Zsolt Macskasi	Continue coding HSE model	0.70	192.50
09/28/10	Zsolt Macskasi	Continue coding HSE model	0.70	192.50
09/29/10	Zsolt Macskasi	Write code forecasting future cases	0.70	192.50
09/30/10	Zsolt Macskasi	Calculate Meso Incidences and create Excel table for A. Brockman	0.30	82.50
09/30/10	Zsolt Macskasi	Continue coding HSE model estimating future mesothelioma incidences	0.50	137.50
10/01/10	Zsolt Macskasi	Draft presentation of future forecasts	0.70	192.50
10/04/10	Zsolt Macskasi	Reviewing SEER data in connection with claims forecasting	0.20	55.00
10/04/10	Zsolt Macskasi	Discuss forecasting methodology w/ Andras (.20 hrs); research alternative forecasting models (.30 hrs)	0.50	137.50
10/13/10	Zsolt Macskasi	Review meso forecasting methodologies	0.20	55.00
10/14/10	Zsolt Macskasi	Review meso forecasting methods	0.20	55.00
10/15/10	Zsolt Macskasi	Discuss meso incidence forecasting results w/ Tom V and Amy	0.40	110.00
10/18/10	Zsolt Macskasi	Research related to mesothelioma forecasting methods	0.20	55.00
10/21/10	Zsolt Macskasi	Research literature on forecasting	0.10	27.50
			<b>11.50</b>	<b>3,162.50</b>
<b>Historical data analysis - model building</b>				
10/01/10	Amy Brockman	Review response from Jones and Granger regarding railroad claims.	1.20	522.00
10/08/10	Amy Brockman	Review documents prepared by counsel to FCR regarding history of asbestos claims.	1.20	522.00
10/25/10	Amy Brockman	Review of data coded from documents received for ARPC sample.	1.20	522.00
10/26/10	Amy Brockman	Additional review of data from coded documents for UCC sample and ARPC sample.	2.10	913.50
			<b>5.70</b>	<b>2,479.50</b>
<b>Total Fees for Actuarial Analysis:</b>			<b>17.20</b>	<b>5,642.00</b>

1220 19th Street, NW, Suite 700  
Washington, DC 20036



analysis•research•planning

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## General Motors Rate Sheet October 2010

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<u>Staff Member</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
Florence, Tom	President	\$555.00	16	\$8,880.00
Brockman, Amy	Vice President	\$435.00	6.9	\$3,001.50
Macskasi, Zsolt	Director	\$275.00	11.5	\$3,162.50
Wagoner, Jason	Director	\$260.00	18.4	\$4,784.00
Oh, Andrew	Director	\$250.00	10.5	\$2,625.00
Kreger, James	Consultant	\$150.00	70.9	\$10,635.00
Wetherald, Sarah	Consultant	\$150.00	16.4	\$2,460.00
Brown, Philip	Consultant	\$125.00	17.5	\$2,187.50
Backhaus, Roland	Consultant	\$85.00	42.5	\$3,612.50
Brands, Jonathan	Consultant	\$85.00	103.5	\$8,797.50
Bravo, Gabriela	Consultant	\$85.00	4	\$340.00
Burr, Aaron	Consultant	\$85.00	150.5	\$12,792.50
Case, Peter	Consultant	\$85.00	116.6	\$9,911.00
Cirenza, Frances	Consultant	\$85.00	50	\$4,250.00
Gee, Will	Consultant	\$85.00	6.5	\$552.50
Geraci, Ben	Consultant	\$85.00	103.5	\$8,797.50
Hester, Clay	Consultant	\$85.00	92	\$7,820.00
Knighton, Jeremy	Consultant	\$85.00	44	\$3,740.00
Melikian, Lia	Consultant	\$85.00	34.9	\$2,966.50
Shiffman, Jeffrey	Consultant	\$85.00	1	\$85.00



1220 19th Street, NW, Suite 700  
Washington, DC 20036

Invoice to:
<b>Dean Trafelet</b> <b>General Motors (GM)</b> 50 W. Schiller St. Chicago, IL 60610

Invoice #	Date	Amount Due
18482	12/16/2010	<b>\$17,507.50</b>

For professional services rendered by Analysis.Research.Planning Corp. (ARPC) during the period November 2010.

Item	Description	Amount
<b>Claims Analysis</b>		
Prepare and edit database(s)		\$2,589.00
Historical data analysis		\$1,110.00
		<b>\$3,699.00</b>
<b>Claim Forecast(s)</b>		
Data analysis - model building		\$2,600.00
Reporting		\$156.00
		<b>\$2,756.00</b>
<b>Review Case Documents and Materials</b>		
Document review and comment		\$6,093.50
		<b>\$6,093.50</b>
<b>Prepare/Attend Calls/Meetings</b>		
Counsel/client meetings/calls		\$3,088.50
		<b>\$3,088.50</b>
<b>Actuarial Analysis</b>		
Historical data analysis - model building		\$522.00
Forecast Methodology		\$1,348.50
		<b>\$1,870.50</b>

Total Amount Due for this Invoice: **\$17,507.50**

Detailed fee and expense information is attached. If you have any questions regarding this invoice, please call Joy Rothwell at (202) 797-1111. Thank you.



Professional by Project

	Rate	Hours	Amount
<b>Claims Analysis</b>			
Florence, Tom	\$555.00	2.00	\$1,110.00
Oh, Andrew	\$250.00	3.70	\$925.00
Wagoner, Jason	\$260.00	6.40	\$1,664.00
			<b>\$3,699.00</b>
<b>Claim Forecast(s)</b>			
Wagoner, Jason	\$260.00	10.60	\$2,756.00
			<b>\$2,756.00</b>
<b>Review Case Documents and Materials</b>			
Brands, Jonathan	\$85.00	1.00	\$85.00
Bravo, Gabriela	\$85.00	4.50	\$382.50
Burr, Aaron	\$85.00	3.80	\$323.00
Case, Peter	\$85.00	7.20	\$612.00
Florence, Tom	\$555.00	2.60	\$1,443.00
Hester, Clay	\$85.00	8.50	\$722.50
Kreger, James	\$150.00	9.80	\$1,470.00
Melikian, Lia	\$85.00	7.30	\$620.50
Wetherald, Sarah	\$150.00	2.90	\$435.00
			<b>\$6,093.50</b>
<b>Prepare/Attend Calls/Meetings</b>			
Brockman, Amy	\$435.00	6.50	\$2,827.50
Brophy, John	\$435.00	0.60	\$261.00
			<b>\$3,088.50</b>
<b>Actuarial Analysis</b>			
Brockman, Amy	\$435.00	4.30	\$1,870.50
			<b>\$1,870.50</b>



Professional Fees (detail)

Claims Analysis				
Date	Staff Member	Description	Hours	Charges
<b>Historical data analysis</b>				
11/02/10	Tom Florence	Analysis of GM subsidiary issues	2.00	1,110.00
			<b>2.00</b>	<b>1,110.00</b>
<b>Prepare and edit database(s)</b>				
11/01/10	Andrew Oh	Summarized final data collection re: legal documents (complaints, interrogatories, depositions)	0.30	75.00
11/01/10	Andrew Oh	Prepared final data collection re: legal documents (complaints, interrogatories, depositions) relating to claims analysis	0.30	75.00
11/01/10	Andrew Oh	Review of legal documents re: claims analysis	0.40	100.00
11/04/10	Jason Wagoner	New review of potential duplicate records using new SSN info.	4.50	1,170.00
11/05/10	Andrew Oh	Organized and summarized all documents received to date	0.90	225.00
11/09/10	Jason Wagoner	Continuing revisions to duplicate claim analysis using new SSN data.	0.40	104.00
11/10/10	Jason Wagoner	Creating new analytical database based on revised duplicate claims analysis.	1.50	390.00
11/22/10	Andrew Oh	Review of FCR sample claims documents	0.40	100.00
11/29/10	Andrew Oh	Review and summary of FCR sample claims legal documents data	1.40	350.00
			<b>10.10</b>	<b>2,589.00</b>
		<b>Total Fees for Claims Analysis:</b>	<b>12.10</b>	<b>3,699.00</b>

Claim Forecast(s)				
Date	Staff Member	Description	Hours	Charges
<b>Data analysis - model building</b>				
11/15/10	Jason Wagoner	Updating forecast scenario due to revised de-dupping using new SSN info.	4.00	1,040.00
11/16/10	Jason Wagoner	Updating remaining forecast scenarios due to revised de-dupping using new SSN info.	4.00	1,040.00
11/17/10	Jason Wagoner	Continuing updating remaining forecast scenarios due to revised de-dupping using new SSN info.	1.00	260.00
11/19/10	Jason Wagoner	Comparison of forecast scenarios after revised de-dupping.	1.00	260.00
			<b>10.00</b>	<b>2,600.00</b>
<b>Reporting</b>				
11/30/10	Jason Wagoner	Review of SAS programs in preparation to write memo regarding forecast methodology data preparation.	0.60	156.00
			<b>0.60</b>	<b>156.00</b>
		<b>Total Fees for Claim Forecast(s):</b>	<b>10.60</b>	<b>2,756.00</b>

Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
<b>Document review and comment</b>				
11/01/10	James Kreger	Continued to review GM case documents in connection with claims analysis.	1.00	150.00
11/05/10	James Kreger	Continued to review GM case documents in connection with claims analysis.	0.30	45.00
11/22/10	Aaron Burr	Reviewed and researched case specific interrogatory responses and deposition transcripts for GM sites and products.	3.80	323.00
11/22/10	Jonathan Brands	Reviewed case specific interrogatory responses and deposition transcripts for GM sites and products.	1.00	85.00
11/22/10	James Kreger	Continued to review case documents in connection with claims analysis.	3.70	555.00



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
<b>Document review and comment</b>				
11/22/10	Lia Melikian	Continued to review Case Specific Deposition Transcripts and Complaints for GM Sites and Products	0.50	42.50
11/22/10	Peter Case	Continued to review Case Specific Deposition Transcripts for GM Sites and Products.	3.50	297.50
11/22/10	Sarah Wetherald	Researched GM complainant legal and medical documents.	2.90	435.00
11/22/10	Clay Hester	Continued to review Case Specific Deposition and Interrogatory Transcripts for GM sites and products.	1.00	85.00
11/23/10	Tom Florence	Additional document review re: brief of counsel	1.50	832.50
11/23/10	Peter Case	Continued to review Case Specific Deposition Transcripts for GM Sites and Products.	3.70	314.50
11/23/10	Lia Melikian	Continued to Review Case Specific Deposition Transcripts and Complaints for GM Sites and Products	6.80	578.00
11/23/10	Gabriela Bravo	Continued to review case specific deposition transcripts and complaints for GM sites and products.	3.00	255.00
11/23/10	James Kreger	Continued to review case documents for GM sites and products.	1.80	270.00
11/23/10	Clay Hester	Continued to review Case Specific Deposition and Interrogatory Transcripts for GM sites and products.	7.50	637.50
11/24/10	Gabriela Bravo	Continued to review case specific deposition transcripts and complaints for GM sites and products.	1.50	127.50
11/24/10	James Kreger	Continued to review case documents for GM sites and products.	3.00	450.00
11/29/10	Tom Florence	Review of hearing transcript 11/22/10	1.10	610.50
			<b>47.60</b>	<b>6,093.50</b>
<b>Total Fees for Review Case Documents and Materials:</b>			<b>47.60</b>	<b>6,093.50</b>

Prepare/Attend Calls/Meetings				
Date	Staff Member	Description	Hours	Charges
<b>Counsel/client meetings/calls</b>				
11/03/10	Amy Brockman	Call with S. Esserman to discuss schedules for expert reports and any outstanding data requests.	0.20	87.00
11/11/10	Amy Brockman	Call with D. Trafelet and counsel to discuss status of claims estimation, data issues, and schedule.	0.50	217.50
11/17/10	John Brophy	Meeting with counsel to discuss reporting scheduling.	0.60	261.00
11/23/10	Amy Brockman	Review multiple drafts of stipulation concerning UCC data requests.	2.10	913.50
11/24/10	Amy Brockman	Review of data from coded documents including matches to claims database as well as UCC and FCR samples (2.4) and summarize results of matches for S. Esserman (0.8).	3.20	1,392.00
11/30/10	Amy Brockman	Call with D. Trafelet and counsel regarding status of schedule and upcoming hearings.	0.50	217.50
			<b>7.10</b>	<b>3,088.50</b>
<b>Total Fees for Prepare/Attend Calls/Meetings:</b>			<b>7.10</b>	<b>3,088.50</b>

Actuarial Analysis				
Date	Staff Member	Description	Hours	Charges
<b>Forecast Methodology</b>				
11/18/10	Amy Brockman	Review data coded from documents related to FCR and UCC samples for trends or anomalies.	3.10	1,348.50
			<b>3.10</b>	<b>1,348.50</b>
<b>Historical data analysis - model building</b>				
11/03/10	Amy Brockman	Respond to question from M. Peterson regarding information on GM subsidiaries.	0.40	174.00



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Actuarial Analysis

Date	Staff Member	Description	Hours	Charges
11/29/10	Amy Brockman	Review transcript from hearing regarding proposed stipulation in relation to UCC data requests.	0.80	348.00
			<b>1.20</b>	<b>522.00</b>
<b>Total Fees for Actuarial Analysis:</b>			<b>4.30</b>	<b>1,870.50</b>





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Washington, D.C. 20036

Phone (202) 797-1111

Fax (202) 797-3619

## General Motors Rate Sheet November 2010

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<u>Staff Member</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
Tom Florence	President	\$555.00	4.6	\$2,553.00
Amy Brockman	Vice President	\$435.00	10.8	\$4,698.00
John Brophy	Vice President	\$435.00	0.6	\$261.00
Jason Wagoner	Director	\$260.00	17	\$4,420.00
Andrew Oh	Director	\$250.00	3.7	\$925.00
James Kreger	Consultant	\$150.00	9.8	\$1,470.00
Sarah Wetherald	Consultant	\$150.00	2.9	\$435.00
Clay Hester	Consultant	\$85.00	8.5	\$722.50
Gabriela Bravo	Consultant	\$85.00	4.5	\$382.50
Jonathan Brands	Consultant	\$85.00	1	\$85.00
Aaron Burr	Consultant	\$85.00	3.8	\$323.00
Lia Melikian	Consultant	\$85.00	7.3	\$620.50
Peter Case	Consultant	\$85.00	7.2	\$612.00



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Invoice to:
<b>Dean Trafelet</b> <b>General Motors (GM)</b> 50 W. Schiller St. Chicago, IL 60610

Invoice #	Date	Amount Due
18809	1/24/2011	<b>\$51,906.83</b>

For professional services rendered by Analysis.Research.Planning Corp. (ARPC) during the period December 2010.

Item	Description	Amount
<b>Claims Analysis</b>		
Compile database(s)		\$680.00
Prepare and edit database(s)		\$6,143.50
Historical data analysis		\$11,375.00
		<b>\$18,198.50</b>
<b>Claim Forecast(s)</b>		
Data analysis - model building		\$858.00
Reporting		\$3,900.00
		<b>\$4,758.00</b>
<b>Review Case Documents and Materials</b>		
Document review and comment		\$16,899.50
		<b>\$16,899.50</b>
<b>Prepare/Attend Calls/Meetings</b>		
Counsel/client meetings/calls		\$1,174.50
		<b>\$1,174.50</b>
<b>Actuarial Analysis</b>		
Historical data analysis - model building		\$7,395.00
Cashflow analysis		\$2,331.00
		<b>\$9,726.00</b>
<b>Expenses</b>		
Expenses		\$1,150.33
		<b>\$1,150.33</b>
Total Amount Due for this Invoice:		<b>\$51,906.83</b>

Detailed fee and expense information is attached. If you have any questions regarding this invoice, please call Joy Rothwell at (202) 797-1111. Thank you.



## Professional by Project

	Rate	Hours	Amount
<b>Claims Analysis</b>			
Brands, Jonathan	\$85.00	7.50	\$637.50
Burr, Aaron	\$85.00	7.80	\$663.00
Case, Peter	\$85.00	7.70	\$654.50
Florence, Tom	\$555.00	13.00	\$7,215.00
Gee, Will	\$85.00	7.00	\$595.00
Jones, Matt	\$85.00	7.70	\$654.50
Knighton, Jeremy	\$85.00	7.00	\$595.00
Oh, Andrew	\$250.00	1.80	\$450.00
Shiffman, Jeffrey	\$85.00	8.00	\$680.00
Wagoner, Jason	\$260.00	20.40	\$5,304.00
Wetherald, Sarah	\$150.00	5.00	\$750.00
			<b>\$18,198.50</b>
<b>Claim Forecast(s)</b>			
Wagoner, Jason	\$260.00	18.30	\$4,758.00
			<b>\$4,758.00</b>
<b>Review Case Documents and Materials</b>			
Brands, Jonathan	\$85.00	13.00	\$1,105.00
Bravo, Gabriela	\$85.00	18.00	\$1,530.00
Burr, Aaron	\$85.00	24.60	\$2,091.00
Case, Peter	\$85.00	9.00	\$765.00
Gee, Will	\$85.00	1.50	\$127.50
Hester, Clay	\$85.00	14.00	\$1,190.00
Knighton, Jeremy	\$85.00	15.00	\$1,275.00
Kreger, James	\$150.00	46.40	\$6,960.00
Melikian, Lia	\$85.00	14.00	\$1,190.00
Wagoner, Jason	\$260.00	2.10	\$546.00
Wetherald, Sarah	\$150.00	0.80	\$120.00
			<b>\$16,899.50</b>
<b>Prepare/Attend Calls/Meetings</b>			
Brockman, Amy	\$435.00	2.70	\$1,174.50
			<b>\$1,174.50</b>
<b>Actuarial Analysis</b>			
Brockman, Amy	\$435.00	17.00	\$7,395.00
Florence, Tom	\$555.00	4.20	\$2,331.00
			<b>\$9,726.00</b>



Professional Fees (detail)

Claims Analysis				
Date	Staff Member	Description	Hours	Charges
<b>Compile database(s)</b>				
12/06/10	Jeffrey Shiffman	Standardized asbestos claimant data.	7.00	595.00
12/07/10	Jeffrey Shiffman	Reviewed depositions for DOB, DOD, and SSN.	1.00	85.00
			<b>8.00</b>	<b>680.00</b>
<b>Historical data analysis</b>				
11/04/10	Tom Florence	Continued analysis of subsidiary issues	1.50	832.50
12/01/10	Tom Florence	Data analysis re: analysis policies	2.30	1,276.50
12/03/10	Tom Florence	Data analysis regarding resolved claims	3.80	2,109.00
12/05/10	Jason Wagoner	Name Matching Claims Register data to GM historic claims database.	3.80	988.00
12/07/10	Jason Wagoner	Revisions to name matching based on additional data cleaning of name fields.	1.60	416.00
12/07/10	Tom Florence	Claims data analysis review	3.20	1,776.00
12/08/10	Jason Wagoner	Continuing revisions to name matching based on additional data cleaning of name fields.	0.80	208.00
12/09/10	Tom Florence	Continued data analysis review	2.20	1,221.00
12/09/10	Jason Wagoner	Summary statistics from results of name matching.	1.40	364.00
12/10/10	Jason Wagoner	Starting revisions to Claims Register and Claims Database matching incorporating State into the matching process (0.9 hrs). Summary of year of birth for injured parties in FCR and CUC samples (0.7 hrs).	1.60	416.00
12/13/10	Jason Wagoner	Starting review of claim summaries from FCR and CUC document review.	0.40	104.00
12/14/10	Jason Wagoner	Continuing review of claim summaries from FCR and CUC document review (0.8 hrs). Continuing revised matching of Claims Register data to claims database (0.9 hrs).	1.70	442.00
12/15/10	Jason Wagoner	Continuing review of claim summaries from FCR and CUC document review (0.7 hrs). Continuing revised matching of Claims Register data to claims database (0.5 hrs). Summary statistics of revised matching (1.1 hrs).	2.30	598.00
12/16/10	Jason Wagoner	Reconciliation of CUC and FCR sample summary statistics.	1.10	286.00
12/17/10	Jason Wagoner	Continuing reconciliation of CUC and FCR sample summary statistics.	1.30	338.00
			<b>29.00</b>	<b>11,375.00</b>
<b>Prepare and edit database(s)</b>				
12/03/10	Andrew Oh	Claim database building	0.90	225.00
12/03/10	Jason Wagoner	Creditor name field data cleaning for Claim Register file to prep for database matching.	4.40	1,144.00
12/06/10	Andrew Oh	Claimant name research	0.90	225.00
12/06/10	Will Gee	Standardize asbestos claimant data	7.00	595.00
12/06/10	Jonathan Brands	Reviewed asbestos claimant data.	7.50	637.50
12/06/10	Aaron Burr	Standardized asbestos claimant data.	7.80	663.00
12/06/10	Peter Case	Standardized asbestos claimant data	7.70	654.50
12/06/10	Jeremy Knighton	Standardized asbestos claimant data	7.00	595.00
12/06/10	Sarah Wetherald	Standardized claimant name data.	4.00	600.00
12/06/10	Matt Jones	Standardized asbestos claimant data	7.70	654.50
12/07/10	Sarah Wetherald	Standardized claimant name data.	1.00	150.00
			<b>55.90</b>	<b>6,143.50</b>



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Claims Analysis				
Date	Staff Member	Description	Hours	Charges
			<b>Total Fees for Claims Analysis:</b>	<b>92.90 18,198.50</b>

Claim Forecast(s)				
Date	Staff Member	Description	Hours	Charges
<b>Data analysis - model building</b>				
12/01/10	Jason Wagoner	Revisions to historic summary tables.	1.20	312.00
12/02/10	Jason Wagoner	Matching claims register data to GM historic claims database	2.10	546.00
			<b>3.30</b>	<b>858.00</b>
<b>Reporting</b>				
12/01/10	Jason Wagoner	Continuing memo re: forecast methodology.	0.40	104.00
12/02/10	Jason Wagoner	Finishing memo re: forecast methodology.	0.80	208.00
12/06/10	Jason Wagoner	Review of forecast summary tables for report (4.8 hrs). Review of draft report of estimated asbestos liabilities. (3.2 hrs)	8.10	2,106.00
12/07/10	Jason Wagoner	Prepare additional summary tables for report of estimated asbestos liabilities.	2.80	728.00
12/08/10	Jason Wagoner	Continuing preparing draft report of estimated asbestos liabilities.	2.90	754.00
			<b>15.00</b>	<b>3,900.00</b>
			<b>Total Fees for Claim Forecast(s):</b>	<b>18.30 4,758.00</b>

Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
<b>Document review and comment</b>				
12/02/10	Aaron Burr	Continued to standardize case specific data regarding claims analysis	1.00	85.00
12/02/10	Lia Melikian	Researched GM subsidiary companies.	1.50	127.50
12/02/10	James Kreger	Continued to review GM case documents in connection with claims analysis.	9.00	1,350.00
12/02/10	Sarah Wetherald	Continued to review GM case documents in connection with claims analysis.	0.80	120.00
12/02/10	Jason Wagoner	Review of data collection from FCR and CUC document review	1.50	390.00
12/02/10	Peter Case	Continued to research GM subsidiaries.	1.30	110.50
12/03/10	Jeremy Knighton	Continued to research DOB and DOD for injured parties	6.00	510.00
12/03/10	Peter Case	Researched claimant dates of birth and death.	7.70	654.50
12/03/10	Clay Hester	Reviewed Case Specific Complaints and Depositions for Injured Party DOB, DOD and SSN.	6.50	552.50
12/03/10	Lia Melikian	Researched DOB and DOD for injured parties in case specific complaints.	5.50	467.50
12/03/10	Jonathan Brands	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products and Injured Party Information.	5.00	425.00
12/03/10	Gabriela Bravo	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products and Injured Party Information.	7.00	595.00
12/03/10	James Kreger	Continued to research case complaints and depositions.	7.90	1,185.00
12/05/10	Aaron Burr	Standardized case specific data regarding claims analysis	9.60	816.00
12/06/10	Gabriela Bravo	Researched DOB, DOD, SSN information for injured parties	7.00	595.00
12/06/10	James Kreger	Continued to review GM case documents in connection with claims analysis.	4.30	645.00
12/06/10	Jeremy Knighton	Researched DOB and DOD information for injured parties	1.00	85.00
12/06/10	Gabriela Bravo	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products and Injured Party Information.	0.50	42.50



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
<b>Document review and comment</b>				
12/07/10	Jeremy Knighton	Continued to research DOB and DOD for injured parties	8.00	680.00
12/07/10	James Kreger	Continued to review GM case documents in connection with claims analysis.	7.90	1,185.00
12/07/10	Lia Melikian	Continued to research DOB, DOD and SSN for injured parties in case specific complaints.	7.00	595.00
12/07/10	Clay Hester	Reviewed Case Specific Complaints and Depositions for Injured Party DOB, DOD, and SSN.	7.50	637.50
12/07/10	Aaron Burr	Continued to standardize case specific data regarding claims analysis	9.00	765.00
12/07/10	Will Gee	reviewed depositions for DOB, DOD, and SSN	1.50	127.50
12/07/10	Gabriela Bravo	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products and Injured Party Information.	3.50	297.50
12/07/10	Jonathan Brands	Continued to review case specific interrogatory responses and deposition transcripts for GM sites and products and Injured Party Information.	8.00	680.00
12/08/10	James Kreger	Continued to review GM case documents in connection with claims analysis.	8.00	1,200.00
12/08/10	Jason Wagoner	Additional review of data collection spreadsheet from FCR and CUC document review.	0.60	156.00
12/08/10	Aaron Burr	Continued to standardize case specific data regarding claims analysis	5.00	425.00
12/13/10	James Kreger	Continued to review GM case documents in connection with claims analysis.	2.50	375.00
12/15/10	James Kreger	Continued to review GM case documents in connection with claims analysis.	0.20	30.00
12/16/10	James Kreger	Continued to review GM case documents in connection with claims analysis.	3.60	540.00
12/17/10	James Kreger	Continued to review GM case documents in connection with claims analysis.	3.00	450.00
			<b>158.40</b>	<b>16,899.50</b>
<b>Total Fees for Review Case Documents and Materials:</b>			<b>158.40</b>	<b>16,899.50</b>
Prepare/Attend Calls/Meetings				
Date	Staff Member	Description	Hours	Charges
<b>Counsel/client meetings/calls</b>				
12/01/10	Amy Brockman	Call with S. Esserman and T. Swett re schedule for reports.	0.40	174.00
12/02/10	Amy Brockman	Attend hearing re schedule of expert reports and estimation hearing in New York with S. Esserman.	1.20	522.00
12/15/10	Amy Brockman	Call with counsel and FCR re status of actuarial analyses and most recent hearings.	0.30	130.50
12/28/10	Amy Brockman	Status call with counsel and FCR to discuss status of discovery and actuarial study.	0.40	174.00
12/30/10	Amy Brockman	Call with counsel and FCR to discuss settlement discussions.	0.40	174.00
			<b>2.70</b>	<b>1,174.50</b>
<b>Total Fees for Prepare/Attend Calls/Meetings:</b>			<b>2.70</b>	<b>1,174.50</b>
Actuarial Analysis				
Date	Staff Member	Description	Hours	Charges
<b>Cashflow analysis</b>				
11/19/10	Tom Florence	Review preliminary estimates of pending and future asbestos liabilities.	4.20	2,331.00
			<b>4.20</b>	<b>2,331.00</b>
<b>Historical data analysis - model building</b>				



Actuarial Analysis				
Date	Staff Member	Description	Hours	Charges
<b>Historical data analysis - model building</b>				
12/01/10	Amy Brockman	Review of FCR sample data re characteristics including date of birth, diagnosis dates, and year of first exposure summaries.	2.60	1,131.00
12/02/10	Amy Brockman	Review additional summaries of data for UCC sample - demographic characteristics.	2.40	1,044.00
12/15/10	Amy Brockman	Review of draft report and tables for report.	3.10	1,348.50
12/20/10	Amy Brockman	Analysis and summary of information in claims register (POC database) regarding the number and type of claims filed.	2.10	913.50
12/21/10	Amy Brockman	Review of analysis in matching claims register with pending pre-petition claims	2.80	1,218.00
12/28/10	Amy Brockman	Review of additional discovery documents received from GM in response to ACC subpoena	1.20	522.00
12/29/10	Amy Brockman	Review of additional database received from GM including defense costs and trial date information.	2.80	1,218.00
			<b>17.00</b>	<b>7,395.00</b>
<b>Total Fees for Actuarial Analysis:</b>			<b>21.20</b>	<b>9,726.00</b>

Expenses (detail)

Expenses				
Date	Category	Description	N/C	Charges
<b>Amy Brockman</b>				
12/01/10	Travel:Client-Related	Parking at Union Station for trip to New York for hearing on Schedule with S. Esserman.		20.00
12/01/10	Travel:Client-Related	Taxi to Ritz Carlton Hotel from train station.		13.90
12/01/10	Travel:Client-Related	Train from Washington DC to New York for hearing on Schedule with S. Esserman.		225.00
12/02/10	Travel:Client-Related	Ritz Carlton Hotel stay for trip to New York for hearing on Schedule with S. Esserman.		651.83
12/02/10	Travel:Client-Related	Taxi to train station from Ritz Carlton Hotel.		14.60
12/02/10	Travel:Client-Related	Train from New York to Washington DC for hearing on schedule with S. Esserman.		225.00
				<b>1,150.33</b>
<b>Total expenses for Expenses:</b>				<b>1,150.33</b>



analysis-research-planning  
1220 19th Street, NW, Suite 700  
Washington, D.C. 20036  
Phone (202) 797-1111  
Fax (202) 797-3619

## General Motors Rate Sheet December 2010

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<u>Staff Member</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
Tom Florence	President	\$555.00	17.2	\$9,546.00
Amy Brockman	Vice President	\$435.00	19.7	\$8,569.50
Jason Wagoner	Director	\$260.00	40.8	\$10,608.00
Andrew Oh	Director	\$250.00	1.8	\$450.00
James Kreger	Consultant	\$150.00	46.4	\$6,960.00
Sarah Wetherald	Consultant	\$150.00	5.8	\$870.00
Aaron Burr	Consultant	\$85.00	32.4	\$2,754.00
Clay Hester	Consultant	\$85.00	14	\$1,190.00
Gabriela Bravo	Consultant	\$85.00	18	\$1,530.00
Jeffrey Shiffman	Consultant	\$85.00	8	\$680.00
Jeremy Knighton	Consultant	\$85.00	22	\$1,870.00
Jonathan Brands	Consultant	\$85.00	20.5	\$1,742.50
Lia Melikian	Consultant	\$85.00	14	\$1,190.00
Matt Jones	Consultant	\$85.00	7.7	\$654.50
Peter Case	Consultant	\$85.00	16.7	\$1,419.50
Will Gee	Consultant	\$85.00	8.5	\$722.50





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Invoice to:
<b>Dean Trafelet</b> <b>General Motors (GM)</b> 50 W. Schiller St. Chicago, IL 60610

Invoice #	Date	Amount Due
18935	2/23/2011	<b>\$61,770.50</b>

For professional services rendered by Analysis.Research.Planning Corp. (ARPC) during the period January 2011.

Item	Description	Amount
<b>Claims Analysis</b>		
	Prepare and edit database(s)	\$182.00
	Historical data analysis	\$4,239.00
		<b>\$4,421.00</b>
<b>Review Case Documents and Materials</b>		
	Document review and comment	\$54,964.50
		<b>\$54,964.50</b>
<b>Actuarial Analysis</b>		
	Reporting	\$2,385.00
		<b>\$2,385.00</b>
Total Amount Due for this Invoice:		<b>\$61,770.50</b>

Detailed fee and expense information is attached. If you have any questions regarding this invoice, please call Joy Rothwell at (202) 797-1111. Thank you.



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## Professional by Project

	Rate	Hours	Amount
<b>Claims Analysis</b>			
Oh, Andrew	\$260.00	0.70	\$182.00
Wagoner, Jason	\$270.00	15.70	\$4,239.00
			<b>\$4,421.00</b>
<b>Review Case Documents and Materials</b>			
Brands, Jonathan	\$85.00	64.00	\$5,440.00
Bravo, Gabriela	\$85.00	66.50	\$5,652.50
Brown, Philip	\$130.00	19.50	\$2,535.00
Burr, Aaron	\$85.00	110.70	\$9,409.50
Florence, Tom	\$580.00	3.00	\$1,740.00
Gee, Will	\$85.00	26.00	\$2,210.00
Hester, Clay	\$85.00	86.20	\$7,327.00
Jones, Matt	\$85.00	58.20	\$4,947.00
Koretz, Phil	\$85.00	20.00	\$1,700.00
Kreger, James	\$155.00	17.30	\$2,681.50
Melikian, Lia	\$85.00	75.60	\$6,426.00
Shiffman, Jeffrey	\$85.00	48.30	\$4,105.50
Wetherald, Sarah	\$85.00	9.30	\$790.50
			<b>\$54,964.50</b>
<b>Actuarial Analysis</b>			
Brockman, Amy	\$450.00	5.30	\$2,385.00
			<b>\$2,385.00</b>

## Professional Fees (detail)

Claims Analysis				
Date	Staff Member	Description	Hours	Charges
<b>Historical data analysis</b>				
01/04/11	Jason Wagoner	Review of new defense cost information database.	0.90	243.00
01/05/11	Jason Wagoner	Review of total defense costs by invoice year (0.8 hrs). Summary of cases with defense costs not matched to forecast data (1.6 hrs)	2.40	648.00
01/06/11	Jason Wagoner	Prepared summaries of average defense costs by disposition year.	2.60	702.00
01/07/11	Jason Wagoner	Revisions to defense cost summaries to exclude non-litigation cases.(1.4 hrs.) Created summaries of defendant table.(1.5 hrs).	2.90	783.00
01/10/11	Jason Wagoner	Created average defense cost summaries for closed claims only. (0.9 hrs). Prepared summary of defense costs for claim still in inventory. (1.3 hrs) Created average defense costs summaries for claim with and without trial dates (1.2 hrs). Created summaries of non-malignant claim share of total resolutions (0.7 hrs).	4.10	1,107.00
01/10/11	Jason Wagoner	Regressions to model historic defense costs as a function of total resolutions and percent of resolutions that are non-malignant claims (1.8 hrs). Starting initial defense cost forecast (1 hr).	2.80	756.00
			<b>15.70</b>	<b>4,239.00</b>
<b>Prepare and edit database(s)</b>				
01/13/11	Andrew Oh	Review of novel complaint submissions for discovery	0.30	78.00
01/15/11	Andrew Oh	Continue to review of complaint submissions for discovery	0.40	104.00
			<b>0.70</b>	<b>182.00</b>
<b>Total Fees for Claims Analysis:</b>			<b>16.40</b>	<b>4,421.00</b>
Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
<b>Document review and comment</b>				
01/13/11	James Kreger	Reviewed GM case documents supplied in response to FCR and ACC requests.	2.00	310.00
01/13/11	Sarah Wetherald	Reviewed GM case documents supplied in response to FCR and ACC requests.	1.80	153.00
01/14/11	Matt Jones	Reviewed GM case documents supplied in response to FCR and ACC requests.	5.00	425.00
01/14/11	Gabriela Bravo	Reviewed GM case documents supplied in response to FCR and ACC requests.	4.00	340.00
01/14/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.50	542.50
01/14/11	Lia Melikian	Reviewed GM case documents supplied in response to FCR and ACC requests.	0.10	8.50
01/14/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.50	42.50
01/14/11	Jonathan Brands	Reviewed GM case documents supplied in response to FCR and ACC requests.	4.00	340.00
01/14/11	Jeffrey Shiffman	Reviewed GM case documents supplied in response to FCR and ACC requests.	5.40	459.00
01/14/11	Clay Hester	Reviewed GM case documents supplied in response to FCR and ACC requests.	5.30	450.50
01/15/11	Will Gee	Reviewed court documents for workplace exposure and illness.	2.50	212.50
01/17/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.10	263.50
01/17/11	Jeffrey Shiffman	Continued to review GM case documents supplied in response to FCR	8.00	680.00



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Review Case Documents and Materials

Date	Staff Member	Description	Hours	Charges
Document review and comment				
		and ACC requests.		
01/17/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.40	204.00
01/17/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.20	697.00
01/17/11	Will Gee	Reviewed court documents for workplace exposure and illness.	3.00	255.00
01/18/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.00	340.00
01/18/11	Jeffrey Shiffman	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
01/18/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
01/18/11	Will Gee	Reviewed court documents for workplace exposure and illness.	10.00	850.00
01/18/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
01/18/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
01/18/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.60	51.00
01/18/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.60	93.00
01/18/11	Gabriela Bravo	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.50	552.50
01/18/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.80	748.00
01/19/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
01/19/11	Jeffrey Shiffman	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
01/19/11	Will Gee	Reviewed court documents for workplace exposure and illness.	9.00	765.00
01/19/11	Gabriela Bravo	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
01/19/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
01/19/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.50	807.50
01/19/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.80	744.00
01/19/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
01/19/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.30	705.50
01/20/11	Will Gee	Reviewed court documents for workplace exposure and illness.	1.50	127.50
01/20/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.50	382.50
01/20/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.50	297.50
01/20/11	Jeffrey Shiffman	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
01/20/11	Gabriela Bravo	Continued to review GM case documents supplied in response to FCR	2.50	212.50



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Review Case Documents and Materials

Date	Staff Member	Description	Hours	Charges
Document review and comment				
		and ACC requests.		
01/20/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.10	8.50
01/20/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.80	493.00
01/20/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.00	340.00
01/21/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
01/21/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.00	340.00
01/21/11	Gabriela Bravo	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
01/21/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.60	93.00
01/21/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
01/21/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
01/22/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	14.00	1,190.00
01/22/11	Jeffrey Shiffman	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.00	850.00
01/22/11	Jeffrey Shiffman	Reviewed settlement releases.	2.20	187.00
01/23/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	13.60	1,156.00
01/24/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.50	807.50
01/24/11	Jeffrey Shiffman	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.80	68.00
01/24/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.70	108.50
01/24/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
01/24/11	Gabriela Bravo	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.50	42.50
01/24/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.30	790.50
01/24/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
01/25/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.40	62.00
01/25/11	Gabriela Bravo	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
01/25/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
01/25/11	Jeffrey Shiffman	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.40	119.00
01/25/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.10	688.50



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Review Case Documents and Materials

Date	Staff Member	Description	Hours	Charges
Document review and comment				
01/25/11	Tom Florence	Review of document discovery response by GM (1 million pages provided).	3.00	1,740.00
01/25/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.30	875.50
01/26/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.20	527.00
01/26/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
01/26/11	Gabriela Bravo	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.50	552.50
01/26/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.40	372.00
01/26/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.40	714.00
01/26/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.10	688.50
01/26/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.50	892.50
01/27/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.00	155.00
01/27/11	Phil Koretz	Reviewed GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
01/27/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
01/27/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
01/27/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.60	646.00
01/27/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
01/27/11	Gabriela Bravo	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
01/28/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.90	416.50
01/28/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.50	382.50
01/28/11	Gabriela Bravo	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
01/28/11	Jeffrey Shiffman	Continued to review GM case documents supplied in response to FCR and ACC requests	0.50	42.50
01/28/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.20	31.00
01/28/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
01/28/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
01/28/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	11.10	943.50



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
<b>Document review and comment</b>				
01/28/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.00	850.00
01/28/11	Philip Brown	Reviewed GM case documents supplied in response to FCR and ACC requests.	10.50	1,365.00
01/28/11	Sarah Wetherald	Reviewed document research.	0.50	42.50
01/29/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.50	212.50
01/30/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
01/31/11	Philip Brown	Reviewed GM case documents supplied in response to FCR and ACC requests.	9.00	1,170.00
01/31/11	Gabriela Bravo	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
01/31/11	James Kreger	Continued to review GM case documents supplied in response to the FCR and ACC requests.	1.10	170.50
01/31/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.60	816.00
01/31/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.50	807.50
01/31/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
01/31/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
01/31/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.80	493.00
01/31/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.00	850.00
01/31/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.00	85.00
			<b>604.60</b>	<b>54,964.50</b>
<b>Total Fees for Review Case Documents and Materials:</b>			<b>604.60</b>	<b>54,964.50</b>

Actuarial Analysis				
Date	Staff Member	Description	Hours	Charges
<b>Reporting</b>				
01/18/11	Amy Brockman	Review analyses and tables in draft report of estimated asbestos liabilities for FCR.	3.20	1,440.00
01/19/11	Amy Brockman	Additional summary tables for draft report of estimated asbestos liabilities.	2.10	945.00
			<b>5.30</b>	<b>2,385.00</b>
<b>Total Fees for Actuarial Analysis:</b>			<b>5.30</b>	<b>2,385.00</b>



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1220 19th Street, NW, Suite 700  
Washington, D.C. 20036  
Phone (202) 797-1111  
Fax (202) 797-3619

## General Motors Rate Sheet January 2011

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<u>Staff Member</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
Tom Florence	President	\$580.00	3	\$1,740.00
Amy Brockman	Vice-President	\$450.00	5.3	\$2,385.00
Jason Wagoner	Director	\$270.00	15.7	\$4,239.00
Andrew Oh	Director	\$260.00	0.7	\$182.00
James Kreger	Consultant	\$155.00	17.3	\$2,681.50
Philip Brown	Consultant	\$130.00	19.5	\$2,535.00
Sarah Wetherald	Consultant	\$85.00	9.3	\$790.50
Jonathan Brands	Consultant	\$85.00	64	\$5,440.00
Gabriela Bravo	Consultant	\$85.00	66.5	\$5,652.50
Aaron Burr	Consultant	\$85.00	110.7	\$9,409.50
Will Gee	Consultant	\$85.00	26	\$2,210.00
Clay Hester	Consultant	\$85.00	86.2	\$7,327.00
Matt Jones	Consultant	\$85.00	58.2	\$4,947.00
Phil Koretz	Consultant	\$85.00	20	\$1,700.00
Lia Melikian	Consultant	\$85.00	75.6	\$6,426.00
Jeffrey Shiffman	Consultant	\$85.00	48.3	\$4,105.50





1220 19th Street, NW, Suite 700  
Washington, DC 20036

Invoice to:
<b>Dean Trafelet</b> <b>General Motors (GM)</b> 50 W. Schiller St. Chicago, IL 60610

Invoice #	Date	Amount Due
19288	3/17/2011	<b>\$116,987.50</b>

For professional services rendered by Analysis.Research.Planning Corp. (ARPC) during the period of February 2011.

Item	Description	Amount
<b>Claims Analysis</b>		
	Prepare and edit database(s)	\$598.00
	Reporting	\$260.00
		<b>\$858.00</b>
<b>Claim Forecast(s)</b>		
	Data analysis - model building	\$729.00
		<b>\$729.00</b>
<b>Plan &amp; Trust Distribution Procedures</b>		
	Drafting and review	\$720.00
		<b>\$720.00</b>
<b>Review Case Documents and Materials</b>		
	Document review and comment	\$113,330.50
		<b>\$113,330.50</b>
<b>Actuarial Analysis</b>		
	Reporting	\$1,350.00
		<b>\$1,350.00</b>
Total Amount Due for this Invoice:		<b>\$116,987.50</b>

Detailed fee and expense information is attached. If you have any questions regarding this invoice, please call Joy Rothwell at (202) 797-1111. Thank you.

## Professional Fees (detail)

Claims Analysis				
Date	Staff Member	Description	Hours	Charges
<b>Prepare and edit database(s)</b>				
02/14/11	Andrew Oh	Data collection/document review	0.40	104.00
02/16/11	Andrew Oh	Further review of data collection regarding claims analysis	1.40	364.00
02/17/11	Andrew Oh	Continued to review data collection regarding claims analysis	0.50	130.00
			<b>2.30</b>	<b>598.00</b>
<b>Reporting</b>				
02/09/11	Andrew Oh	Claim document review summary for A.Brockman	1.00	260.00
			<b>1.00</b>	<b>260.00</b>
		<b>Total Fees for Claims Analysis:</b>	<b>3.30</b>	<b>858.00</b>

Claim Forecast(s)				
Date	Staff Member	Description	Hours	Charges
<b>Data analysis - model building</b>				
02/24/11	Jason Wagoner	Additional summaries of historic defense costs and revisions to defense cost forecast scenarios.	1.30	351.00
02/25/11	Jason Wagoner	Alternative defense forecast scenarios based on different calibration periods for average defense costs.	1.40	378.00
			<b>2.70</b>	<b>729.00</b>
		<b>Total Fees for Claim Forecast(s):</b>	<b>2.70</b>	<b>729.00</b>

Plan & Trust Distribution Procedures				
Date	Staff Member	Description	Hours	Charges
<b>Drafting and review</b>				
02/22/11	John Brophy	Work on trust start-up process	0.50	225.00
02/23/11	John Brophy	Review of start-up of Trust issues	0.60	270.00
02/28/11	John Brophy	Continued to work on Trust set-up	0.50	225.00
			<b>1.60</b>	<b>720.00</b>
		<b>Total Fees for Plan &amp; Trust Distribution Procedures:</b>	<b>1.60</b>	<b>720.00</b>

Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
<b>Document review and comment</b>				
02/01/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/01/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.40	374.00
02/01/11	Philip Brown	Reviewed GM case documents supplied in response to FCR and ACC requests.	8.20	1,066.00
02/01/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.80	663.00
02/01/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.20	17.00
02/01/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.40	34.00
02/01/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.00	850.00



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
02/02/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.50	892.50
02/02/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/02/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.00	170.00
02/02/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.60	731.00
02/02/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.80	663.00
02/02/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.30	46.50
02/02/11	Doug Smythe	Reviewed GM case documents supplied in response to FCR and ACC requests.	2.50	212.50
02/02/11	Philip Brown	Reviewed GM case documents supplied in response to FCR and ACC requests.	8.10	1,053.00
02/03/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.50	297.50
02/03/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
02/03/11	Philip Brown	Reviewed GM case documents supplied in response to FCR and ACC requests.	4.80	624.00
02/03/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/03/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
02/03/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.30	620.50
02/04/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.90	671.50
02/04/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.50	42.50
02/04/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
02/04/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.50	77.50
02/04/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.50	467.50
02/04/11	Philip Brown	Reviewed GM case documents supplied in response to FCR and ACC requests.	4.90	637.00
02/05/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.50	127.50
02/07/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.50	382.50
02/07/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.20	31.00
02/07/11	Philip Brown	Reviewed GM case documents supplied in response to FCR and ACC requests.	1.50	195.00



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
02/07/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
02/07/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.50	807.50
02/07/11	Sarah Wetherald	Continued to review GM case documents supplied in response to the FCR and ACC requests.	1.70	144.50
02/07/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.30	790.50
02/07/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.50	127.50
02/08/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.50	127.50
02/08/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.30	875.50
02/08/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.10	773.50
02/08/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.80	578.00
02/08/11	Sarah Wetherald	Continued to review GM case documents supplied in response to the FCR and ACC requests.	3.10	263.50
02/08/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.30	620.50
02/08/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.50	467.50
02/08/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	930.00
02/08/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.00	340.00
02/08/11	Jeffrey Shiffman	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.20	272.00
02/09/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.30	790.50
02/09/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.00	340.00
02/09/11	Sarah Wetherald	Continued to review GM case documents supplied in response to the FCR and ACC requests.	5.00	425.00
02/09/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
02/09/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.10	480.50
02/09/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.00	850.00
02/09/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/09/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
02/10/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
02/10/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.90	841.50
02/10/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.00	340.00
02/10/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.90	671.50
02/10/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
02/10/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.20	31.00
02/10/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.70	654.50
02/10/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/10/11	Sarah Wetherald	Continued to review GM case documents supplied in response to the FCR and ACC requests.	0.70	59.50
02/11/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
02/11/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.20	272.00
02/11/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
02/11/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.60	51.00
02/11/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.40	374.00
02/11/11	Ioana Tchoukleva	Reviewed GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/11/11	Troy Baker	Reviewed GM case documents supplied in response to FCR and ACC requests.	0.50	42.50
02/11/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.00	155.00
02/11/11	Sarah Wetherald	Continued to review GM case documents supplied in response to the FCR and ACC requests.	0.50	42.50
02/13/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.50	212.50
02/14/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
02/14/11	Sarah Wetherald	Continued to review GM case documents supplied in response to the FCR and ACC requests.	1.00	85.00
02/14/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/14/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
02/14/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
02/14/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
02/14/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.50	467.50
02/14/11	Ben Geraci	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.00	425.00
02/14/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.20	31.00
02/14/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.00	340.00
02/14/11	Troy Baker	Reviewed GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
02/14/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/15/11	Sarah Wetherald	Continued to review GM case documents supplied in response to the FCR and ACC requests.	1.00	85.00
02/15/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.80	663.00
02/15/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.90	139.50
02/15/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/15/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.50	807.50
02/15/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.20	697.00
02/15/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/15/11	Troy Baker	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
02/15/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
02/15/11	Ben Geraci	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.80	578.00
02/16/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.10	178.50
02/16/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/16/11	Ben Geraci	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.00	850.00
02/16/11	Emma Connolly	Reviewed GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
02/16/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.50	467.50
02/16/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.70	654.50
02/16/11	Troy Baker	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
02/16/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR	7.00	595.00



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
		and ACC requests.		
02/16/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/16/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
02/17/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/17/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.10	178.50
02/17/11	Troy Baker	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/17/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/17/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/17/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.20	442.00
02/17/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.50	77.50
02/17/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/17/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/17/11	Timothy Raab	Review of data collected from TIF files. Prep a design for data collection in SQL.	2.50	712.50
02/17/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.20	697.00
02/18/11	Troy Baker	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
02/18/11	Sarah Wetherald	Continued to review GM case documents supplied in response to the FCR and ACC requests.	0.50	42.50
02/18/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.80	68.00
02/18/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.00	340.00
02/18/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.30	535.50
02/18/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.40	62.00
02/18/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.80	408.00
02/18/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/18/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
02/18/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.50	212.50
02/18/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR	9.00	765.00



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
		and ACC requests.		
02/19/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
02/19/11	Troy Baker	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	5.00	425.00
02/19/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	14.50	1,232.50
02/19/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.50	127.50
02/19/11	Nick McTyre	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.50	127.50
02/20/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.80	238.00
02/20/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	14.10	1,198.50
02/21/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
02/21/11	Troy Baker	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
02/21/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	28.50	2,422.50
02/21/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	13.20	1,122.00
02/21/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	12.30	1,045.50
02/21/11	Phil Koretz	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	7.80	663.00
02/22/11	Phil Koretz	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	11.00	935.00
02/22/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/22/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.70	654.50
02/22/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.50	892.50
02/22/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.50	77.50
02/22/11	Ben Geraci	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	7.80	663.00
02/22/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/22/11	Kevin Miller	Reviewed GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
02/22/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/22/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.20	867.00
02/22/11	Troy Baker	Continued to reviewed GM case documents supplied in response to FCR	9.00	765.00





Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
		and ACC requests.		
02/23/11	Troy Baker	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
02/23/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.20	697.00
02/23/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.50	467.50
02/23/11	Phil Koretz	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	11.00	935.00
02/23/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/23/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.20	31.00
02/23/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.00	85.00
02/23/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.30	875.50
02/23/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/23/11	Ben Geraci	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	5.80	493.00
02/23/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/23/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.30	875.50
02/24/11	Phil Koretz	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	11.00	935.00
02/24/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
02/24/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/24/11	Ben Geraci	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	7.20	612.00
02/24/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
02/24/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.10	348.50
02/24/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.20	31.00
02/24/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.40	714.00
02/24/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/24/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	15.80	1,343.00
02/24/11	Troy Baker	Continued to reviewed GM case documents supplied in response to FCR	8.00	680.00



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
		and ACC requests.		
02/24/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
02/24/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/25/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/25/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.00	85.00
02/25/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.80	663.00
02/25/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	16.20	1,377.00
02/25/11	Ben Geraci	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	6.50	552.50
02/25/11	Troy Baker	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
02/25/11	Phil Koretz	Continued to reviewed GM case documents supplied in response to FCR and ACC requests.	12.10	1,028.50
02/25/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
02/25/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests	6.00	510.00
02/25/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
02/25/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
02/28/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/28/11	Emma Connolly	Continued to review GM case documents supplied in response to FCRand ACC requests.	8.00	680.00
02/28/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/28/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
02/28/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.50	807.50
02/28/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.70	739.50
02/28/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
02/28/11	Ben Geraci	Continued to review GM case documents supplied in response to FCRand ACC requests.	7.20	612.00
02/28/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.20	187.00
02/28/11	Matt Jones	Continued to review GM case documents supplied in response to FCR	7.00	595.00



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
		and ACC requests.		
02/28/11	Ben Geraci	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/28/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
02/28/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.20	31.00
02/28/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.50	807.50
			<b>1,301.00</b>	<b>113,330.50</b>
<b>Total Fees for Review Case Documents and Materials:</b>			<b>1,301.00</b>	<b>113,330.50</b>

Actuarial Analysis				
Date	Staff Member	Description	Hours	Charges
Reporting				
02/08/11	Amy Brockman	Review of documents being coded and resulting data in relation to actuarial analyses.	1.80	810.00
02/24/11	Amy Brockman	Review of data collected to date from review of discovery documents.	1.20	540.00
			<b>3.00</b>	<b>1,350.00</b>
<b>Total Fees for Actuarial Analysis:</b>			<b>3.00</b>	<b>1,350.00</b>



analysis·research·planning  
1220 19th Street, NW, Suite 700  
Washington, D.C. 20036  
Phone (202) 797-1111  
Fax (202) 797-3619

## General Motors Rate Sheet

February 2011

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<u>Staff Member</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
Amy Brockman	Vice-President	\$450.00	3	\$1,350.00
John Brophy	Vice-President	\$450.00	1.6	\$720.00
Jason Wagoner	Director	\$270.00	2.7	\$729.00
Andrew Oh	Director	\$260.00	3.3	\$858.00
Timothy Raab	Director	\$285.00	2.5	\$712.50
Lia Melikian	Consultant	\$85.00	120.2	\$10,217.00
Troy Baker	Consultant	\$85.00	95	\$8,075.00
Aaron Burr	Consultant	\$85.00	190	\$16,150.00
Ben Geraci	Consultant	\$85.00	64.3	\$5,465.50
Clay Hester	Consultant	\$85.00	178.9	\$15,206.50
Doug Smythe	Consultant	\$85.00	39.6	\$3,366.00
Emma Connolly	Consultant	\$85.00	55.5	\$4,717.50
Ioana Tchoukleva	Consultant	\$85.00	76.5	\$6,502.50
James Kreger	Consultant	\$155.00	14.4	\$2,232.00
Jeffrey Shiffman	Consultant	\$85.00	3.2	\$272.00
Jonathan Brands	Consultant	\$85.00	167.6	\$14,246.00
Kevin Miller	Consultant	\$85.00	33.5	\$2,847.50
Matt Jones	Consultant	\$85.00	58	\$4,930.00
Nick McTyre	Consultant	\$85.00	1.5	\$127.50
Phil Koretz	Consultant	\$85.00	154.4	\$13,124.00
Philip Brown	Consultant	\$130.00	27.5	\$3,575.00
Sarah Wetherald	Consultant	\$85.00	18.4	\$1,564.00



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Invoice to:
<b>Dean Trafelet</b> <b>General Motors (GM)</b> 50 W. Schiller St. Chicago, IL 60610

Invoice #	Date	Amount Due
19588	5/4/2011	<b>\$204,776.50</b>

For professional services rendered by Analysis.Research.Planning Corp. (ARPC) during the period March 2011.

Item	Description	Amount
<b>Claims Analysis</b>		
	Prepare and edit database(s)	\$10,079.00
	Historical data analysis	\$108.00
		<b>\$10,187.00</b>
<b>Claim Forecast(s)</b>		
	Data analysis - model building	\$1,566.00
		<b>\$1,566.00</b>
<b>Plan &amp; Trust Distribution Procedures</b>		
	Reporting	\$330.00
		<b>\$330.00</b>
<b>Review Case Documents and Materials</b>		
	Document review and comment	\$191,402.00
		<b>\$191,402.00</b>
<b>Prepare/Attend Calls/Meetings</b>		
	Administrative	\$427.50
		<b>\$427.50</b>
<b>Actuarial Analysis</b>		
	Cashflow analysis	\$864.00
		<b>\$864.00</b>

Total Amount Due for this Invoice: **\$204,776.50**

Detailed fee and expense information is attached. If you have any questions regarding this invoice, please call Joy Rothwell at (202) 797-1111. Thank you.



Professional by Project

	Rate	Hours	Amount
<b>Claims Analysis</b>			
Brower, Nathan	\$260.00	29.40	\$7,644.00
Oh, Andrew	\$260.00	2.20	\$572.00
Wagoner, Jason	\$270.00	7.30	\$1,971.00
			<b>\$10,187.00</b>
<b>Claim Forecast(s)</b>			
Wagoner, Jason	\$270.00	5.80	\$1,566.00
			<b>\$1,566.00</b>
<b>Plan &amp; Trust Distribution Procedures</b>			
Cryblskey, Todd	\$275.00	1.20	\$330.00
			<b>\$330.00</b>
<b>Review Case Documents and Materials</b>			
Baker, Troy	\$85.00	141.60	\$12,036.00
Brands, Jonathan	\$85.00	23.00	\$1,955.00
Burr, Aaron	\$85.00	193.30	\$16,430.50
Chanpong, Katherine (Katie)	\$85.00	60.20	\$5,117.00
Connolly, Emma	\$85.00	77.70	\$6,604.50
Eickemeyer, Jason	\$85.00	29.70	\$2,524.50
Geraci, Ben	\$85.00	28.70	\$2,439.50
Hester, Clay	\$85.00	200.70	\$17,059.50
Hogg, Seamus	\$85.00	26.90	\$2,286.50
Jones, Matt	\$85.00	114.50	\$9,732.50
Koretz, Phil	\$85.00	118.60	\$10,081.00
Kreger, James	\$155.00	47.70	\$7,393.50
Kurkky, Brian	\$85.00	53.50	\$4,547.50
McTyre, Nick	\$85.00	13.50	\$1,147.50
Melikian, Lia	\$85.00	70.80	\$6,018.00
Miller, Kevin	\$85.00	134.00	\$11,390.00
Partridge, Diana	\$85.00	63.50	\$5,397.50
Patel, Monica	\$85.00	68.10	\$5,788.50
Potter, Lauran	\$85.00	81.90	\$6,961.50
Rajpal, Sanjay	\$85.00	96.20	\$8,177.00
Ross, Adam	\$85.00	64.20	\$5,457.00
Shiffman, Jeffrey	\$85.00	21.50	\$1,827.50
Siegel, Molly	\$85.00	84.00	\$7,140.00
Smythe, Doug	\$85.00	22.30	\$1,895.50
Sperling, Coline	\$85.00	169.00	\$14,365.00
Tchoukleva, Ioana	\$85.00	185.80	\$15,793.00



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**Review Case Documents and Materials**

Wagoner, Jason	\$270.00	0.60	\$162.00
Wetherald, Sarah	\$85.00	19.70	\$1,674.50

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**\$191,402.00**

**Prepare/Attend Calls/Meetings**

Cox, Joyce	\$75.00	5.70	\$427.50
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**\$427.50**

**Actuarial Analysis**

Molnar, Andras	\$240.00	3.60	\$864.00
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**\$864.00**



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**Total Outstanding Balance (as of 05/04/11)**

> 90 Days	61-90 Days	31-60 Days	1-30 Days	Current	Total
\$56,090.20	\$12,354.10	\$116,987.50	\$207,441.72	\$204,776.50	<b>\$597,650.02</b>

**Professional Fees (detail)**

Claims Analysis				
Date	Staff Member	Description	Hours	Charges
<b>Historical data analysis</b>				
03/18/11	Jason Wagoner	Review of historic database to see available data for determining historic "mechanic" claims.	0.40	108.00
			<b>0.40</b>	<b>108.00</b>
<b>Prepare and edit database(s)</b>				
03/07/11	Andrew Oh	Claimant data research	0.30	78.00
03/09/11	Andrew Oh	Claimant data research	0.30	78.00
03/10/11	Andrew Oh	Claimant data research	0.40	104.00
03/11/11	Andrew Oh	Claimant data research	0.70	182.00
03/15/11	Andrew Oh	Claims data research	0.50	130.00
03/18/11	Nathan Brower	Begin standardizing document database	1.50	390.00
03/21/11	Nathan Brower	Continue standardizing document database fields.	2.20	572.00
03/23/11	Nathan Brower	Continue standardizing document database fields.	2.50	650.00
03/23/11	Jason Wagoner	Review of claim matching between database and summary spreadsheet of release document review.	0.90	243.00
03/24/11	Jason Wagoner	Review of claim matching between database and summary spreadsheet of release document review (0.6 hrs). Review of data compiled from document review of complaints (0.7 hrs).	1.30	351.00
03/25/11	Jason Wagoner	Review of data compiled from document review of complaints including potential duplicate records and data available for matching to claims database.	1.10	297.00
03/25/11	Nathan Brower	Conduct name matches between document and claimant database (2.6); additional matching algorithms including demographic data (3.6)	6.20	1,612.00
03/28/11	Nathan Brower	Continue matching algorithms (3.1); Test match results for additional systematizing (2.4)	5.50	1,430.00
03/29/11	Jason Wagoner	Supervision of matching process of complaint document review data and claims database.	0.90	243.00
03/29/11	Nathan Brower	Additional matching algorithms regarding claims analysis (3.4) and manual review of nonmatches (2.6)	6.00	1,560.00
03/30/11	Nathan Brower	edit database	6.50	NC
03/30/11	Jason Wagoner	Supervision of matching process of complaint document review data and claims database.	0.60	162.00
03/31/11	Nathan Brower	Summarize results of matching algorithms (3.2) and create charts (2.2)	5.50	1,430.00
03/31/11	Jason Wagoner	Supervision of matching process between complaint document review data and claims database. (0.5 hrs) Review of potential data issues from complaint document data (0.8 hrs). Review of claims that reported multiple filing states (0.8 hrs).	2.10	567.00
			<b>45.00</b>	<b>10,079.00</b>
<b>Total Fees for Claims Analysis:</b>			<b>45.40</b>	<b>10,187.00</b>

Claim Forecast(s)				
Date	Staff Member	Description	Hours	Charges
<b>Data analysis - model building</b>				
03/08/11	Jason Wagoner	Revised defense cost forecast: Revised inventory valuation to account	5.80	1,566.00





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Claim Forecast(s)				
Date	Staff Member	Description	Hours	Charges
<b>Data analysis - model building</b>				
		for closed claims on "open" cases (1.6 hrs). Additional regressions to predicted defense costs based on non-malignant percent of total filings (0.5 hrs). Claim summaries of historic non-malignant share of total filings and percent of total filings still open by year (2.4 hrs). Sensitivity tests of forecast to changes in calibration period used for average defense costs (1.3 hrs).		
			<b>5.80</b>	<b>1,566.00</b>
<b>Total Fees for Claim Forecast(s):</b>			<b>5.80</b>	<b>1,566.00</b>

Plan & Trust Distribution Procedures				
Date	Staff Member	Description	Hours	Charges
<b>Reporting</b>				
03/16/11	Todd Cryblskey	GM Website review with TM	0.50	137.50
03/23/11	Todd Cryblskey	Website review.	0.70	192.50
			<b>1.20</b>	<b>330.00</b>
<b>Total Fees for Plan &amp; Trust Distribution Procedures:</b>			<b>1.20</b>	<b>330.00</b>

Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
<b>Document review and comment</b>				
03/01/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/01/11	Ben Geraci	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
03/01/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.30	280.50
03/01/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
03/01/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.60	731.00
03/01/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
03/01/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.70	654.50
03/01/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/01/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.80	68.00
03/01/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.50	552.50
03/01/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
03/01/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.00	155.00
03/01/11	Molly Siegel	Reviewed GM Case documents, supplied and response to FCR and ACC requests.	8.50	722.50
03/01/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.00	850.00
03/02/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
03/02/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
03/02/11	Ben Geraci	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.20	442.00
03/02/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.30	790.50
03/02/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.30	620.50
03/02/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.30	620.50
03/02/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.70	484.50
03/02/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/02/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.00	340.00
03/02/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
03/02/11	Jeffrey Shiffman	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.20	102.00
03/02/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.50	77.50
03/02/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
03/02/11	Molly Siegel	Continued to review GM Case documents, supplied and response to FCR and ACC requests.	5.00	425.00
03/02/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.60	816.00
03/03/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.50	382.50
03/03/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.00	425.00
03/03/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/03/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/03/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.40	62.00
03/03/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
03/03/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.50	552.50
03/03/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.40	714.00
03/03/11	Molly Siegel	Continued to review GM Case documents, supplied and response to FCR and ACC requests.	7.00	595.00
03/03/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00



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Review Case Documents and Materials

Date	Staff Member	Description	Hours	Charges
03/03/11	Ben Geraci	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/03/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/03/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
03/03/11	Jonathan Brands	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
03/03/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.20	527.00
03/04/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
03/04/11	Coline Sperling	Reviewed GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/04/11	Molly Siegel	Continued to review GM Case documents, supplied and response to FCR and ACC requests.	8.00	680.00
03/04/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.30	25.50
03/04/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.50	542.50
03/04/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.00	340.00
03/04/11	Ben Geraci	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
03/04/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.60	51.00
03/04/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.40	34.00
03/04/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.20	442.00
03/05/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.50	212.50
03/05/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
03/07/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.30	46.50
03/07/11	Molly Siegel	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/07/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.00	85.00
03/07/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.80	68.00
03/07/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.10	688.50
03/07/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.50	297.50



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
03/07/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests	5.00	425.00
03/07/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.00	425.00
03/07/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.50	807.50
03/07/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.50	382.50
03/07/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/07/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/07/11	Adam Ross	Reviewed GM Case Documents Supplied in response to FCR and ACC requests.	6.00	510.00
03/08/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests	7.20	612.00
03/08/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
03/08/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.10	858.50
03/08/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
03/08/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
03/08/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/08/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.00	340.00
03/08/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.00	850.00
03/08/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.30	620.50
03/08/11	Molly Siegel	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
03/08/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.20	31.00
03/08/11	Diana Partridge	Reviewed GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
03/08/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.30	705.50
03/08/11	Adam Ross	Continued Review of GM Case Documents; Supplied in response to FCR and ACC requests.	7.60	646.00
03/08/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
03/09/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.40	62.00
03/09/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	12.10	1,028.50
03/09/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/09/11	Troy Baker	Continued to review GM case documents supplied in response to FCR	8.20	697.00



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
		and ACC requests.		
03/09/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/09/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.30	365.50
03/09/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests	7.00	595.00
03/09/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
03/09/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.30	705.50
03/09/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
03/09/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.20	527.00
03/09/11	Molly Siegel	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/09/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.00	425.00
03/10/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/10/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.20	782.00
03/10/11	Diana Partridge	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
03/10/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
03/10/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.50	77.50
03/10/11	Molly Siegel	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.00	425.00
03/10/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests	8.20	697.00
03/10/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
03/10/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
03/10/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.20	612.00
03/10/11	Adam Ross	Continued Review of GM Case Documents; Supplied in response to FCR and ACC requests.	7.20	612.00
03/10/11	Katherine (Katie) Chan	Reviewed case documents supplied in response to FCR and ACC requests.	5.50	467.50
03/10/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/10/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.20	782.00
03/11/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.00	425.00
03/11/11	Adam Ross	Continued Review of GM Case Documents; Supplied in response to FCR and ACC requests.	2.30	195.50



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
03/11/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.10	518.50
03/11/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.60	646.00
03/11/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.80	153.00
03/11/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests	6.50	552.50
03/11/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.00	465.00
03/11/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.50	42.50
03/11/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.50	297.50
03/11/11	Katherine (Katie) Chan	Continued to review case documents supplied in response to FCR and ACC requests.	3.00	255.00
03/11/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
03/11/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.30	620.50
03/11/11	Molly Siegel	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.00	340.00
03/12/11	Diana Partridge	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.00	425.00
03/12/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.40	374.00
03/14/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.00	425.00
03/14/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/14/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.10	858.50
03/14/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/14/11	Adam Ross	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
03/14/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.50	552.50
03/14/11	Katherine (Katie) Chan	Continued to review case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/14/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.10	170.50
03/14/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/14/11	Molly Siegel	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
03/14/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.40	119.00
03/14/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/14/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR	3.00	255.00



Review Case Documents and Materials

Date	Staff Member	Description	Hours	Charges
Document review and comment				
		and ACC requests.		
03/14/11	Jeffrey Shiffman	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.70	314.50
03/15/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
03/15/11	Molly Siegel	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
03/15/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
03/15/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
03/15/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.50	892.50
03/15/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.30	195.50
03/15/11	Adam Ross	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
03/15/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.00	850.00
03/15/11	Jeffrey Shiffman	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.20	527.00
03/15/11	Lauran Potter	Reviewed GM case documents supplied in response to FCR and ACC requests.	3.50	297.50
03/15/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/15/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.50	467.50
03/15/11	Katherine (Katie) Chan	Continued to review case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/15/11	Diana Partridge	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
03/15/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.70	418.50
03/15/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/16/11	Jeffrey Shiffman	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/16/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.50	467.50
03/16/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/16/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/16/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.90	161.50
03/16/11	Lauran Potter	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.70	654.50
03/16/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.40	714.00
03/16/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.70	569.50



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Review Case Documents and Materials

Date	Staff Member	Description	Hours	Charges
Document review and comment				
03/16/11	Doug Smythe	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.70	229.50
03/16/11	Adam Ross	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.30	705.50
03/16/11	Katherine (Katie) Chan	Continued to review case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/16/11	Molly Siegel	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
03/16/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.50	542.50
03/16/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.50	892.50
03/16/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/16/11	Sanjay Rajpal	Reviewed GM case documents supplied in response to FCR and ACC requests	7.50	637.50
03/16/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/17/11	Lauran Potter	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/17/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
03/17/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
03/17/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.80	589.00
03/17/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.40	289.00
03/17/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/17/11	Jeffrey Shiffman	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.40	34.00
03/17/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
03/17/11	Diana Partridge	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.50	467.50
03/17/11	Monica Patel	Reviewed GM case documents supplied in response to FCR and ACC requests.	6.50	552.50
03/17/11	Katherine (Katie) Chan	Continued to review case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/17/11	Adam Ross	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.30	535.50
03/17/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/17/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.80	663.00
03/17/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
03/18/11	Monica Patel	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.30	705.50
03/18/11	James Kreger	Continued to review GM case documents supplied in response to FCR	1.80	279.00





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Review Case Documents and Materials

Date	Staff Member	Description	Hours	Charges
Document review and comment				
		and ACC requests.		
03/18/11	Adam Ross	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
03/18/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
03/18/11	Sanjay Rajpal	Continued to review GM case documents supplied in response to FCR and ACC requests	8.30	705.50
03/18/11	Diana Partridge	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
03/18/11	Katherine (Katie) Chan	Continued to review case documents supplied in response to FCR and ACC requests.	6.00	510.00
03/18/11	Lauran Potter	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.90	671.50
03/18/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
03/18/11	Jason Wagoner	Review of new claim data compiled from document review of release and complaint documents.	0.60	162.00
03/18/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
03/18/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
03/19/11	Katherine (Katie) Chan	Continued to review case documents supplied in response to FCR and ACC requests.	6.20	527.00
03/19/11	Nick McTyre	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
03/19/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	17.00	1,445.00
03/19/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.80	408.00
03/19/11	Sanjay Rajpal	Continued to review GM case documents supplied in response to FCR and ACC requests	6.50	552.50
03/19/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.70	399.50
03/19/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.20	527.00
03/19/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.50	127.50
03/20/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	11.00	935.00
03/20/11	Nick McTyre	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.00	510.00
03/20/11	Katherine (Katie) Chan	Continued to review case documents supplied in response to FCR and ACC requests.	5.50	467.50
03/20/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	17.00	1,445.00
03/20/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.00	255.00
03/20/11	Sanjay Rajpal	Continued to review GM case documents supplied in response to FCR and ACC requests	5.20	442.00
03/21/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.30	875.50



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
Document review and comment				
03/21/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.60	403.00
03/21/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.10	178.50
03/21/11	Monica Patel	Reviewed GM case documents supplied in response to FCR and ACC requests.	10.70	909.50
03/21/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.50	467.50
03/21/11	Sanjay Rajpal	Continued to review GM case documents supplied in response to FCR and ACC requests	7.80	663.00
03/21/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.80	833.00
03/21/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests.	0.20	17.00
03/21/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/21/11	Lauran Potter	Reviewed GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/21/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.80	748.00
03/21/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.00	850.00
03/21/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	13.00	1,105.00
03/22/11	Lauran Potter	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.60	646.00
03/22/11	Diana Partridge	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
03/22/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	12.50	1,062.50
03/22/11	Monica Patel	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
03/22/11	Sanjay Rajpal	Continued to review GM case documents supplied in response to FCR and ACC requests	7.20	612.00
03/22/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.90	926.50
03/22/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests	6.30	535.50
03/22/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.50	807.50
03/22/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.80	279.00
03/22/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.50	807.50
03/22/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.00	255.00
03/22/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.70	739.50
03/23/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
03/23/11	Troy Baker	Continued to review GM case documents supplied in response to FCR	8.50	722.50



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Review Case Documents and Materials

Date	Staff Member	Description	Hours	Charges
Document review and comment				
		and ACC requests.		
03/23/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.40	527.00
03/23/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
03/23/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.30	875.50
03/23/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	13.00	1,105.00
03/23/11	Phil Koretz	Continued to review GM case documents supplied in response to FCR and ACC requests	6.00	510.00
03/23/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.00	255.00
03/23/11	Brian Kurkijy	Reviewed GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/23/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.50	892.50
03/23/11	Sanjay Rajpal	Continued to review GM case documents supplied in response to FCR and ACC requests	8.20	697.00
03/23/11	Lauran Potter	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.10	688.50
03/23/11	Monica Patel	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.20	697.00
03/24/11	Lia Melikian	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.40	204.00
03/24/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.50	467.50
03/24/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.00	85.00
03/24/11	Lauran Potter	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/24/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.60	731.00
03/24/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
03/24/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
03/24/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	10.00	850.00
03/24/11	Sanjay Rajpal	Continued to review GM case documents supplied in response to FCR and ACC requests	7.80	663.00
03/24/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/24/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.00	465.00
03/24/11	Monica Patel	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.10	688.50
03/24/11	Brian Kurkijy	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/24/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	13.00	1,105.00



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
03/24/11	Seamus Hogg	Reviewed GM case documents supplied in response to FCR and ACC requests.	6.50	552.50
03/25/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/25/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.50	637.50
03/25/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.60	136.00
03/25/11	Seamus Hogg	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/25/11	Monica Patel	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.50	722.50
03/25/11	Brian Kurkijy	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.80	663.00
03/25/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.80	748.00
03/25/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.60	248.00
03/25/11	Diana Partridge	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.50	467.50
03/25/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.30	620.50
03/25/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	13.00	1,105.00
03/25/11	Lauran Potter	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.60	646.00
03/25/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.50	807.50
03/25/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.50	297.50
03/25/11	Sanjay Rajpal	Continued to review GM case documents supplied in response to FCR and ACC requests	8.20	697.00
03/27/11	Diana Partridge	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.50	467.50
03/28/11	Sanjay Rajpal	Continued to review GM case documents supplied in response to FCR and ACC requests	8.00	680.00
03/28/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.00	155.00
03/28/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.10	773.50
03/28/11	Lauran Potter	Reviewed GM case documents supplied in response to FCR and ACC requests.	7.30	620.50
03/28/11	Emma Connolly	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.50	127.50
03/28/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.00	255.00
03/28/11	Monica Patel	Continued to review case documents supplied in response to FCR and ACC requests.	4.80	408.00
03/28/11	Jason Eickemeyer	Reviewed GM case documents supplied in response to FCR and ACC requests.	7.30	620.50
03/28/11	Seamus Hogg	Reviewed GM case documents supplied in response to FCR and ACC	4.20	357.00



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Review Case Documents and Materials

Date	Staff Member	Description	Hours	Charges
Document review and comment				
		requests.		
03/28/11	Brian Kurkijy	Reviewed GM case documents supplied in response to FCR and ACC requests.	9.70	824.50
03/28/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/28/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.00	85.00
03/28/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/28/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.80	748.00
03/28/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/28/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests	8.00	680.00
03/29/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.20	651.00
03/29/11	Diana Partridge	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
03/29/11	Seamus Hogg	Reviewed GM case documents supplied in response to FCR and ACC requests.	0.80	68.00
03/29/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/29/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests	8.00	680.00
03/29/11	Jason Eickemeyer	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.10	688.50
03/29/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/29/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/29/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/29/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.00	85.00
03/29/11	Lauran Potter	Reviewed GM case documents supplied in response to FCR and ACC requests.	2.70	229.50
03/29/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	9.00	765.00
03/29/11	Sanjay Rajpal	Continued to review GM case documents supplied in response to FCR and ACC requests	7.20	612.00
03/29/11	Brian Kurkijy	Continued to review GM case documents supplied in response to FCR and ACC requests.	7.00	595.00
03/30/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/30/11	Seamus Hogg	Reviewed GM case documents supplied in response to FCR and ACC requests.	7.40	629.00
03/30/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/30/11	Jason Eickemeyer	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00



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Review Case Documents and Materials				
Date	Staff Member	Description	Hours	Charges
<b>Document review and comment</b>				
03/30/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests	8.00	680.00
03/30/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	3.10	480.50
03/30/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/30/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/30/11	Brian Kurkijy	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/30/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.00	340.00
03/30/11	Sanjay Rajpal	Continued to review GM case documents supplied in response to FCR and ACC requests	8.30	705.50
03/30/11	Troy Baker	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/31/11	Kevin Miller	Continued to review GM case documents supplied in response to FCR and ACC requests	3.30	280.50
03/31/11	Brian Kurkijy	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.00	425.00
03/31/11	Jeffrey Shiffman	Continued to review GM case documents supplied in response to FCR and ACC requests.	2.00	170.00
03/31/11	Clay Hester	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.50	382.50
03/31/11	Coline Sperling	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.20	442.00
03/31/11	James Kreger	Continued to review GM case documents supplied in response to FCR and ACC requests.	4.30	666.50
03/31/11	Lauran Potter	Reviewed GM case documents supplied in response to FCR and ACC requests.	5.50	467.50
03/31/11	Ioana Tchoukleva	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/31/11	Sarah Wetherald	Continued to review GM case documents supplied in response to FCR and ACC requests.	1.50	127.50
03/31/11	Sanjay Rajpal	Continued to review GM case documents supplied in response to FCR and ACC requests	6.00	510.00
03/31/11	Jason Eickemeyer	Continued to review GM case documents supplied in response to FCR and ACC requests.	6.30	535.50
03/31/11	Monica Patel	Continued to review case documents supplied in response to FCR and ACC requests.	4.50	382.50
03/31/11	Katherine (Katie) Chan	Continued to review case documents supplied in response to FCR and ACC requests.	2.00	170.00
03/31/11	Aaron Burr	Continued to review GM case documents supplied in response to FCR and ACC requests.	8.00	680.00
03/31/11	Matt Jones	Continued to review GM case documents supplied in response to FCR and ACC requests.	5.50	467.50
			<b>2,211.20</b>	<b>191,402.00</b>
<b>Total Fees for Review Case Documents and Materials:</b>			<b>2,211.20</b>	<b>191,402.00</b>

Prepare/Attend Calls/Meetings				
Date	Staff Member	Description	Hours	Charges
<b>Administrative</b>				



1220 19th Street, NW, Suite 700  
Washington, DC 20036

Prepare/Attend Calls/Meetings				
Date	Staff Member	Description	Hours	Charges
<b>Administrative</b>				
03/02/11	Joyce Cox	Forward guestroom confirmations for The Peninsular hotel and finalize BEO's.	1.00	75.00
03/06/11	Joyce Cox	GM guestroom search in Austin TX.	1.00	75.00
03/07/11	Joyce Cox	Continued guestroom search in Austin TX for March 15th (1.6). Acquire additional meeting space and guestrooms for Friday, March 11th meeting in Chicago (1.4).	3.00	225.00
03/09/11	Joyce Cox	Confirm guestrooms in Austin TX and forward confirmations.	0.50	37.50
03/15/11	Joyce Cox	Create Exec and general use teleconference accounts.	0.20	15.00
			<b>5.70</b>	<b>427.50</b>
<b>Total Fees for Prepare/Attend Calls/Meetings:</b>			<b>5.70</b>	<b>427.50</b>

Actuarial Analysis				
Date	Staff Member	Description	Hours	Charges
<b>Cashflow analysis</b>				
03/18/11	Andras Molnar	Review of Trust documentation. Review of forecast file.	1.10	264.00
03/30/11	Andras Molnar	Programming GM cash flow model. Consulting with Amy Brockman.	1.70	408.00
03/31/11	Andras Molnar	Programming cash flow model.	0.80	192.00
			<b>3.60</b>	<b>864.00</b>
<b>Total Fees for Actuarial Analysis:</b>			<b>3.60</b>	<b>864.00</b>

## **EXHIBIT H**



Hearing Date: To Be Determined  
Objection Deadline: To Be Determined

STUTZMAN, BROMBERG,  
ESSERMAN & PLIFKA  
A PROFESSIONAL CORPORATION  
Sander L. Esserman (Admitted *Pro Hac Vice*)  
Robert T. Brousseau (Admitted *Pro Hac Vice*)  
Peter C. D'Apice  
Jo E. Hartwick (Admitted *Pro Hac Vice*)  
2323 Bryan Street, Suite 2200  
Dallas, Texas 75201  
Telephone: 214-969-4900  
Facsimile: 214-969-4999

Counsel for Dean M. Trafelet in his  
Capacity as Legal Representative for Future Asbestos  
Personal Injury Claimants

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

-----X  
)  
In re ) Chapter 11  
)  
MOTORS LIQUIDATION COMPANY, *et al.*, ) Case No. 09-50026 (REG)  
)  
f/k/a General Motors Corp., *et al.* )  
)  
Debtors. ) (Jointly Administered)  
-----X

**CERTIFICATION OF B. THOMAS FLORENCE  
IN SUPPORT OF THIRD INTERIM AND FINAL APPLICATION OF ANALYSIS  
RESEARCH PLANNING CORPORATION AS ASBESTOS CLAIMS VALUATION  
CONSULTANT TO DEAN M. TRAFELET IN HIS CAPACITY AS LEGAL  
REPRESENTATIVE FOR FUTURE ASBESTOS PERSONAL INJURY CLAIMANTS  
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT  
OF EXPENSES INCURRED FOR THE INTERIM PERIOD  
FROM OCTOBER 1, 2010 THROUGH MARCH 29, 2011 AND THE FINAL PERIOD  
FROM MARCH 1, 2010 THROUGH MARCH 29, 2011**

I, B. Thomas Florence, certify as follows:

1. I am the President and a Principal of the firm of Analysis Research Planning Corporation (“**ARPC**”) and I am authorized to make this Certification on behalf of ARPC. I am over the age of 18 years, and am competent and otherwise qualified to make this Certification. Unless otherwise stated in this Certification, I have personal knowledge of the facts set forth herein.
2. I submit this Certification in support of the *Third Interim and Final Application of Analysis Research Planning Corporation as Asbestos Claims Valuation Consultant to Dean M. Trafelet in his Capacity as Legal Representative for Future Asbestos Personal Injury Claimants for Allowance of Compensation and Reimbursement of Expenses Incurred for the Interim Period from October 1, 2010 through March 29, 2011 and the Final Period from March 1, 2010 through March 29, 2011* (the “**Application**”) and in accordance with the Local Guidelines.<sup>1</sup>
3. I have read the Application.
4. To the best of my knowledge, information and belief formed upon the basis of my participation in this case, as well as after reasonable inquiry, the Application complies with the Local Guidelines.
5. The Future Claimants’ Representative has been provided with a copy of the Application, and has approved the fees and disbursements requested therein.
6. To the best of my knowledge, information and belief formed upon the basis of my participation in this case, as well as after reasonable inquiry, the facts set forth in the Application are true and correct and the fees and disbursements sought in the Application fall within the Local Guidelines and the U.S. Trustee Guidelines, except as specifically noted herein.

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to such terms in the Application.

7. Except to the extent that fees or disbursements are prohibited by the Local Guidelines or the U.S. Trustee Guidelines, the fees and disbursements sought are billed at rates and in accordance with practices customarily employed by ARPC and generally accepted by ARPC's clients.

8. To the best of my knowledge, information and belief, with respect to the disbursements for which reimbursement is sought, ARPC does not make a profit on such disbursements, whether the service is performed in-house or by a third party.

9. In accordance with the Interim Compensation Order, the Debtor, counsel for the Debtor, the United States Trustee for the Southern District of New York, and counsel for the Creditors' Committee have each been provided with a statement of fees and disbursements accruing during each month for which compensation is sought in the Application on or about the 30th day of each month following the end of the month for which compensation was sought. Counsel for the Fee Examiner and counsel for the Asbestos Committee were also provided with copies of ARPC's monthly fee statements.

10. In accordance with the Interim Compensation Order and the Local Guidelines, the Debtor, counsel for the Debtor, the United States Trustee for the Southern District of New York, and counsel to the Creditors' Committee will each be provided with a copy of the Application simultaneously with the filing thereof. Counsel for the Fee Examiner and counsel for the Asbestos Committee will also be provided with a copy of the Application simultaneously with the filing thereof.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 16th day of May 2011, in Washington, D.C.

/s/ B. Thomas Florence  
B. Thomas Florence