

Bates White, LLC  
1300 Eye Street, NW  
Suite 600E  
Washington, DC 20005  
(202) 408-6110

*Asbestos Liability Consultants for the Official Committee of Unsecured  
Creditors of Motors Liquidation Co., (f/k/a General Motors Corp.) et al.*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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

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**FIRST INTERIM APPLICATION OF BATES WHITE, LLC, AS ASBESTOS  
LIABILITY CONSULTANT TO THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL  
SERVICES RENDERED AND FOR REIMBURSEMENT OF ACTUAL AND  
NECESSARY EXPENSES INCURRED FOR THE PERIOD FROM  
MARCH 16, 2010 THROUGH MAY 31, 2010**

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

Name of Applicant:	<u>Bates White, LLC</u>
Authorized to Provide Professional Services to:	<u>The Official Committee of Unsecured Creditors</u>
Interim Fee Period:	<u>March 16, 2010 to May 31, 2010, inclusive</u>
Fees Requested:	<u>\$198,620.00</u>
Expenses Requested:	<u>\$776.00</u>
Total Amount Requested:	<u>\$199,396.00</u>
Amount Paid to Date:	<u>\$160,292.80<sup>1</sup></u>
<b>Net Amount to be Requested:</b>	<b><u>\$39,103.20</u></b>

This is a(n) X Interim or \_\_\_\_\_ Final Fee Application

**PRIOR APPLICATIONS**

None.

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<sup>1</sup> Although Bates White has not yet received payment in respect of its May Statement (as hereinafter defined), Bates White anticipates receiving payment of 80% of fees and 100% of expenses for the May Statement by the hearing date on this Application.

**SUMMARY OF FIRST INTERIM FEE APPLICATION OF BATES WHITE, LLC FOR  
SERVICES RENDERED FOR THE PERIOD  
MARCH 16, 2010 THROUGH MAY 31, 2010**

<u>Timekeeper Name</u>	<u>Department</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Charles Bates	Environmental and Products Liability	Senior Partner	59.70	\$850.00	\$50,745.00
Charles Mullin	Environmental and Products Liability	Partner	8.40	\$625.00	\$5,250.00
Michael Brown	Environmental and Products Liability	Principal	.80	\$450.00	\$360.00
Andrew Evans	Environmental and Products Liability	Principal	5.20	\$425.00	\$2,210.00
Rachel Grinberg	Environmental and Products Liability	Manager	119.60	\$395.00	\$47,242.00
Christopher Wieman	Information Services	Manager	5.00	\$385.00	\$1,925.00
Jorge Gallardo-Garcia	Environmental and Products Liability	Manager	3.40	\$375.00	\$1,275.00
Peter Kelso	Environmental and Products Liability	Manager	2.50	\$375.00	\$937.50
Samantha Johnson	Environmental and Products Liability	Quality Assurance Specialist	15.00	\$325.00	\$4,875.00
Andra Ban	Environmental and Products Liability	Senior Consultant	53.00	\$325.00	\$2,372.50
Susan Coughlin	Environmental and Products Liability	Senior Consultant	41.50	\$335.00	\$13,902.50
William Robinson	Environmental and Products Liability	Consultant II	17.20	\$275.00	\$4,730.00
David Sendor	Environmental and Products Liability	Consultant II	34.50	\$295.00	\$10,177.50
Zachary Bolian	Environmental and Products Liability	Consultant I	75.40	\$255.00	\$19,227.00
Mary Huang	Environmental and Products Liability	Consultant I	27.80	\$255.00	\$7,089.00

<u>Timekeeper Name</u>	<u>Department</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Christopher Morrow	Environmental and Products Liability	Consultant I	44.90	\$255.00	\$11,449.50
<b>Total</b>			513.90		\$198,620.00

Blended hourly rate for consultants is \$395.34.

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	)	Case No. 09-50026 (REG)
Debtors.	)	Jointly Administered
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**FIRST INTERIM APPLICATION OF BATES WHITE, LLC, AS ASBESTOS  
LIABILITY CONSULTANTS FOR THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL  
SERVICES RENDERED AND FOR REIMBURSEMENT OF ACTUAL AND  
NECESSARY EXPENSES INCURRED FOR THE PERIOD FROM  
MARCH 16, 2010 THROUGH MAY 31, 2010**

## TABLE OF CONTENTS

Preliminary Statement.....	1
Summary of Professional Compensation and Reimbursement of Expenses Requested .....	2
Background .....	5
Summary of Services Rendered.....	6
Statement of Bates White.....	10
Actual and Necessary Disbursements of Bates White.....	11
The Requested Compensation Should Be Allowed.....	11
Notice.....	12
Conclusion .....	13

## TABLE OF AUTHORITIES

### Statutes and Rules

11 U.S.C. § 105(a) .....	2
11 U.S.C. § 330 .....	2
11 U.S.C. § 330(a) .....	1
11 U.S.C. § 330(a)(1) .....	10
11 U.S.C. § 330(a)(3) .....	11
11 U.S.C. § 331 .....	1, 2, 10
11 U.S.C. § 1103 .....	6
11 U.S.C. § 1107 .....	5
11 U.S.C. § 1108 .....	5
28 U.S.C. § 1746 .....	13
Fed. R. Bank. P. 2016(a) .....	2

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

Bates White, LLC (the "**Applicant**" or "**Bates White**"), asbestos liability consultant to the Official Committee of Unsecured Creditors (the "**Committee**") of the above captioned as debtors and debtors-in-possession in these chapter 11 cases (collectively, the "**Debtors**"), hereby submits its first interim application (the "**Application**"), pursuant to sections 330(a) and 331 of title 11 of the United States Code (the "**Bankruptcy Code**") and Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), for the allowance of compensation for the professional services performed by the Applicant for and on behalf of the Committee for the period commencing March 16, 2010, through and including May 31, 2010 (the "**First Interim Fee Period**"), and for reimbursement of its actual and necessary expenses incurred during the First Interim Fee Period. In support of the Application, the Applicant respectfully represents as follows:

### **PRELIMINARY STATEMENT**

1. The Applicant was retained as the Committee's asbestos liability consultant. Throughout the First Interim Fee Period, the Applicant has worked on behalf of the Committee to evaluate Debtors' potential asbestos liability.

2. The Applicant's work in these cases has been focused on assessing and quantifying potential charges to the Debtors estate arising from or related to current and future asbestos claims.

3. The highlights of the Applicant's work during the First Interim Fee Period are as follows:

- Research of the underlying source of the Debtors' asbestos liability
- Work on methodology to forecast the Debtors' asbestos liability
- Investigate analytical basis of the liability forecast

- Initial overview of the Debtors' asbestos claims data
- Understanding and standardizing the fields in the Debtors' claims data

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

4. This Application has been prepared in accordance with the Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases adopted by the Court on November 29, 2009 (the "**Local Guidelines**"), the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted on January 30, 1996 (the "**UST Guidelines**"), the Order Pursuant to sections 105(a) and 331 of the Bankruptcy Code, Bankruptcy Rule 2016(a) and Local Bankruptcy Rule 2016-1, Establishing Procedures for Interim Monthly Compensation for Professionals [Docket No. 1334] (the "**Interim Compensation Order**") and the First Status Report of the Fee Examiner [Docket No. 5002] (the "**Fee Examiner Status Report**") and collectively with the Interim Compensation Order, the Local Guidelines and UST Guidelines, the "**Guidelines**"). Pursuant to the Local Guidelines, a certification of Charles Bates regarding compliance with same is attached hereto as **Exhibit "A."**

5. The Applicant seeks interim allowance of fees for professional services rendered during the First Interim Fee Period in the aggregate amount of \$198,620.00 (the "**First Interim Fees**") and reimbursement of expenses incurred in connection with rendition of those services in the aggregate amount of \$776.00 (the "**First Interim Expenses**").

6. During the First Interim Fee Period, the Applicant's personnel expended a total of 513.90 hours for which compensation is requested.

7. There is no agreement or understanding between the Applicant and any other person, other than members of the Applicant, for the sharing of compensation to be received for services rendered in these cases.

8. Except as otherwise set forth herein, the fees charged by the Applicant in these cases are billed in accordance with its existing billing rates and procedures set forth in the Application of the Committee to Employ Bates White, LLC [Docket No. 5480] in effect during the First Interim Fee Period. The billing rates the Applicant charges for the services rendered by its personnel in these chapter 11 cases are the same rates that the Applicant charges for services rendered in comparable non-bankruptcy matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in a competitive national economics consulting market.

9. Pursuant to the UST Guidelines, annexed hereto as **Exhibit "B,"** is a schedule setting forth all personnel employed by the Applicant who have performed services in these chapter 11 cases during the First Interim Fee Period, the capacities in which each such individual is employed by the Applicant, the department in which each individual practices, the hourly billing rate charged by the Applicant for services performed by such individual, and the aggregate number of hours expended and fees billed.

10. Annexed hereto as **Exhibit "C"** is a schedule specifying the categories of expenses for which the Applicant is seeking reimbursement, the total amount for each such expense category and a detailed listing of each of the expenses.

11. Pursuant to Section II.D of the UST Guidelines, annexed hereto as **Exhibit "D-1"** is a summary of the Applicant's time billed during the First Interim Fee Period, broken down by project categories as hereinafter described.

12. The Applicant maintains computerized records of the time spent by all of the Applicant's professionals in connection with the services provided to the Committee. These detailed time records were submitted to the "Notice Parties" specified in the Interim Compensation Order as part of the Monthly Statements (defined below). Copies of the final

detailed time records for the First Interim Fee Period are annexed hereto as **Exhibit “D-2.”**

13. Since the commencement of these cases, the Applicant has provided the appropriate notice parties with a monthly fee statement for each month for which compensation was sought. During the First Interim Fee Period, the Applicant provided the appropriate notice parties with the following monthly fee statements:

- For March 16, 2010 through March 31, 2010, fees of \$22,739.00 and expenses of \$0 (“**March Statement**”);
- For April 1, 2010 through April 30, 2010, fees of \$48,113.00 and expenses of \$0 (“**April Statement**”); and
- For May 1, 2010 through May 31, 2010, fees of \$127,768.00 and expenses of \$776.00 (“**May Statement**”).

14. In total, the Applicant has submitted Monthly Statements during the First Interim Fee Period for fees of \$198,620.00 and expenses of \$776.00. As of the date of this Application, no notice party has objected to the Applicant’s Monthly Statements for the First Interim Fee Period.

15. In accordance with the Interim Compensation Order, the Applicant sought payment for 80% of its fees and 100% of its expenses incurred, pursuant to each Monthly Statement filed with the Court. With respect to the March Statement, the Applicant received a payment of \$18,191.20, representing 80% of fees (\$18,191.20) and 100% of expenses (\$0.00) requested. With respect to the April Statement, the Applicant received a payment of \$38,940.40, representing 80% of fees (\$38,940.40) and 100% of expenses (\$0.00). With respect to the May Statement, the Applicant has not yet received any payments.<sup>2</sup>

16. In total, therefore, pursuant to this Application, the Applicant respectfully requests that the Court enter an order approving the payments received pursuant to the Monthly

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<sup>2</sup> Bates White anticipates receiving payment of 80% of fees and 100% of expenses for the May Statement by the hearing date on this Application.

Statements and directing the Debtors to pay the Applicant \$39,879.20, representing 20% of the First Interim Fees.

17. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the First Interim Fee Period, but were not processed prior to the preparation of this Application, the Applicant reserves the right to request compensation for such services and reimbursement of such expenses in a future application.

### **BACKGROUND**

18. On June 1, 2009 (the "**Petition Date**"), the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.<sup>3</sup> The Debtors continue to operate their business as debtors-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. The Debtors' cases are being jointly-administered.

19. On June 3, 2009 (the "**Formation Date**"), the United States Trustee for the Southern District of New York (the "**United States Trustee**") appointed the Committee consisting of fifteen members. The nine current members of the Committee are: (1) Wilmington Trust Company, (2) Law Debenture Trust Company of New York, (3) The Industrial Division of Communications Workers of America, AFL-CIO, (4) International Union, United Automobile Aerospace and Agricultural Implement Workers of America, (5) United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, (6) Inteva Products, LLC, (7) Serra Chevrolet of Birmingham, Inc, (8) Genoveva Bermudez, and (9) Kevin Schoenl.<sup>4</sup>

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<sup>3</sup> On October 9, 2009, two additional Debtors affiliates filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

<sup>4</sup> As a result of the consummation of the Sale Transaction, five Committee members – Pension Benefit Guaranty Corporation, Interpublic Group, Paddock Chevrolet, Saturn of Hempstead, Inc. and DENSO International America, Inc. – have resigned from the Committee. As a result of being appointed to the asbestos committee, Mark Butita was removed from the Committee.

20. On March 16, 2010, the Committee selected the Applicant as its asbestos liability consultant. Immediately thereafter, the Applicant commenced rendering economic consulting services to the Committee, pending the approval of its retention by this Court. By the order of this Court dated April 30, 2010 [Docket No. 5683] (the “**Retention Order**”), the Applicant’s retention was approved *nunc pro tunc* to March 16, 2010, pursuant to section 1103 of the Bankruptcy Code.

### **SUMMARY OF SERVICES RENDERED**

21. During the First Interim Fee Period, the Applicant’s efforts were largely focused on coordinating with the Debtors and the other interested parties on key issues concerning the potential asbestos liability of the Debtors’ estates. The services rendered by the Applicant during the First Interim Fee Period are summarized below. The following summary is not a detailed description of the work performed, as the day-to-day services and the time expended in performing such services are fully set forth in the detailed time records. Rather, in compliance with the UST Guidelines, the following summary highlights certain areas in which services were rendered by the Applicant to and for the benefit of the Committee, and identifies some of the issues to which the Applicant devoted significant time and efforts during the First Interim Fee Period.

22. The summary is divided according to the project billing codes that the Applicant created to best reflect the categories of tasks that it was required to perform in connection with these chapter 11 cases. Nevertheless, under the circumstances, and given the interconnectedness of all the issues in these chapter 11 cases, certain of these categories may overlap with each other.

23. The Applicant respectfully submits that its services throughout the First Interim Fee Period warrant this Court's approval of its requested fees and expenses, including the payment of the 20% "hold-back" of the First Interim Fees.

**A. Consulting**  
**(Fees: \$64,596.50; Hours Billed: 208.70)**

24. During the First Interim Fee Period, the Applicant devoted time in this category to the following tasks: developing a strategy for the valuation of Debtors' pending and future asbestos-related liability; outlining the research tasks and modeling approach to estimate Debtors' future asbestos liability; briefing Committee's counsel on research and modeling approach; downloading data that provides a comprehensive overview of Debtors' historical settlements with asbestos claimants; review of Debtors' claims data in order to gain an understanding of filing patterns, patterns of average settlement values; analysis of factors which drive differences in Debtors' settlement values; and developing and refining claims processing algorithms for datasets.

**B. Expert Time**  
**(Fees: \$50,745.00; Hours Billed: 59.70)**

25. During the First Interim Fee Period, the Applicant devoted time in this category to the following tasks: Preparing for and participating in conference calls with counsel for the Committee; developing methodology for the estimation of Debtors asbestos liability; developing prototype of the model to value Debtors asbestos liability; determining data needed for liability valuation; background research on Debtors' asbestos-containing product; and preparing declaration associated with retention for court filing;

**C. Analysis**  
**(Fees: \$36,708.00; Hours Billed: 113.0)**

26. During the First Interim Fee Period, the Applicant devoted time in this category to the following tasks: Gathering information on asbestos litigation environment,

including information on asbestos verdicts to better understand the Debtors' settlement history; gathering information on assets in asbestos 524(g) trusts; analyzing impact of asbestos trust assets on current defendants' payments; assessment and review of additional sources of data to supplement the Debtors' claims data.

**D. Research**  
**(Fees: \$22,394.00; Hours Billed: 70.40)**

27. During the First Interim Fee Period, the Applicant devoted time in this category to the following tasks: Defining research goals associated with the valuation of Debtors asbestos liability; researching Debtors corporate history and potential product markets; identifying and researching Debtors' asbestos-containing products; reviewing Debtors' prior asbestos litigation history; compiling and reviewing epidemiological studies related to brake mechanics; reviewing state tort laws with respect to various court rulings; reviewing studies relevant to Debtors' asbestos litigation; gathering background information about asbestos claims valuation in bankruptcy cases; gathering information on bankrupt asbestos defendants; and gathering information for the retention application.

**E. Modeling**  
**(Fees: \$15,642.00; Hours Billed: 36.9)**

28. During the First Interim Fee Period, the Applicant devoted time in this category to the following tasks: Developing a modeling strategy to properly value Debtors pending and future asbestos liability taking into account trends in the tort system likely to influence the value of future claims; documenting modeling methodology; prototyping the "General Model" to value Debtors' future asbestos liability.

**F. Data Gathering and Processing**  
**(Fees: \$4,727.50; Hours Billed: 12.1)**

29. During the First Interim Fee Period, the Applicant devoted time in this category to the following tasks: Analyzing Debtors' historical asbestos claims data; analyzing

fields in claims data and assessing need for further data; standardizing fields in claims data; and reviewing and cleaning data processing code.

**G. Project Management  
(Fees: \$3,807.00; Hours Billed: 10.4)**

30. During the First Interim Fee Period, the Applicant continued to keep abreast of the information filed in the Debtors' bankruptcy cases. The Applicant devoted time to administrative tasks, including, but not limited to: Working on declaration for court approval as expert to the Committee; writing engagement letter; reviewing time keeping guidelines; and reviewing time records to ensure compliance with timekeeping protocols.

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### STATEMENT OF BATES WHITE

31. The foregoing professional services performed by the Applicant were appropriate and necessary. They were in the best interests of creditors, the Debtors and other parties-in-interest. Compensation for the foregoing services as requested is commensurate with the complexity, importance and nature of the problems, issues or tasks involved. The professional services were performed in an appropriately expeditious and efficient manner.

32. The professional services performed by the Applicant on behalf of the Committee during the First Interim Fee Period required an aggregate expenditure of 513.9 recorded hours by the Applicant's employees. Of the aggregate time expended, 68.1 recorded hours were expended by Partners of the Applicant, 6 recorded hours were expended by personnel at the level of Principal, 130.5 recorded hours were expended by personnel at the level of Manager; 294.3 recorded hours were expended by personnel at the level of Senior Consultant, Consultant II and Consultant I, and 15 recorded hours were expended by Quality Assurance Specialist of the Applicant.

33. During the First Interim Fee Period, the Applicant's hourly billing rates for its personnel ranged from \$850.00 to \$255.00 per hour. Allowance of compensation in the amount requested would result in a blended hourly billing rate of approximately \$395.34 per hour (based upon 513.90 recorded hours at the Applicant's regular billing rates in effect at the time of the performance of services). Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable bankruptcy cases in a competitive national economics consulting market. As noted, attached hereto in Exhibit "B" is a schedule listing each of Applicant's personnel who performed services in these cases during the First Interim Fee Period, the hourly rate charged by the Applicant for services performed by each individual and the aggregate number of hours and charges by each individual.

## **ACTUAL AND NECESSARY DISBURSEMENTS OF BATES WHITE**

34. As set forth in **Exhibit “C”** hereto, the Applicant has disbursed \$776.00 as expenses incurred in providing professional services during the First Interim Fee Period.

35. The Applicant has made every effort to minimize its disbursements in these cases. The actual expenses, which are billed at their cost to Applicant, incurred in providing professional services were necessary, reasonable, and justified under the circumstances to serve the needs of the Committee.

### **THE REQUESTED COMPENSATION SHOULD BE ALLOWED**

36. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 to govern the Court’s award of such compensation. 11 U.S.C. § 331. Section 330 provides that a court may award a professional employed under section 328 of the Bankruptcy Code “reasonable compensation for actual necessary services rendered . . . and reimbursement for actual, necessary expenses.” 11 U.S.C. § 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

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

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;

(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 this title.

11 U.S.C. § 330(a)(3).

37. Here, the Applicant respectfully submits that the services for which it seeks compensation in this Application were necessary for, beneficial to, and in the best interests of, the Committee. The Applicant further submits that the compensation requested herein is reasonable in light of the nature, extent, and value of such services to the Committee. The services rendered by the Applicant were consistently performed in a timely manner commensurate with the complexity, importance, and nature of the issues involved. The Applicant respectfully submits that approval of the compensation sought herein is warranted.

#### **NOTICE**

38. Notice of this Application has been provided in accordance with the Interim Compensation Order and the Fee Examiner Status Report. Because of the nature of the relief requested, the Applicant submits that such notice is sufficient and that no further notice of the relief requested in the Application need be given to any party.

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**CONCLUSION**

WHEREFORE, the Applicant respectfully requests that the Court enter an order (i) awarding the Applicant the interim allowance of (a) fees for the First Interim Fee Period in the aggregate amount of \$198,620.00, and (b) the reimbursement for actual and necessary expenses the Applicant incurred during the First Interim Fee Period in the amount of \$776.00; (ii) authorizing and directing the Debtors to pay the Applicant \$39,103.20, representing all unpaid amounts for the First Interim Fee Period; and (iii) granting such other relief as is just.

Dated: August 5, 2010  
Washington, DC



Charles Bates

Bates White, LLC  
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(202) 408-6110

*Asbestos Liability Consultants for the Official  
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**EXHIBIT A**

**Certification of Charles Bates**

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UNITED STATES BANKRUPTCY COURT  
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MOTORS LIQUIDATION COMPANY., <u>et al.</u>	)	Chapter 11
(f/k/a General Motors Corp., <u>et al.</u> )	)	
	)	Case No. 09-50026 (REG)
Debtors.	)	Jointly Administered
	)	

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**CERTIFICATION UNDER GUIDELINES FOR FEES AND DISBURSEMENTS FOR PROFESSIONALS IN RESPECT OF FIRST APPLICATION OF BATES WHITE, LLC FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES**

I, Charles Bates, hereby certify that:

1. I am Chairman of Bates White, LLC (the "Applicant"), with responsibility as asbestos liability consultant to the Official Committee of Unsecured Creditors (the "Committee") of the Debtors bankruptcy cases of Motors Liquidation Company, (f/k/a General Motors Corp.) et al. as debtors and debtors-in-possession in the Debtors bankruptcy cases (collectively, the "Debtors"), and I submit this first application for interim compensation in compliance with the Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases adopted by the Court on November 29, 2009 (the "Local Guidelines"), the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted on January 30, 1996 (the "UST Guidelines"), and the Order Pursuant to sections 105(a) and 331 of

the Bankruptcy Code, Bankruptcy Rule 2016(a) and Local Bankruptcy Rule 2016-1, Establishing Procedures for Interim Monthly Compensation for Professionals [Docket No. 3711] (the “Interim Compensation Order”) and, collectively with the Local Guidelines and UST Guidelines, the “Guidelines”).

2. This certification is made in respect of the Applicant’s application, dated August 5, 2010 (the “Application”), for interim compensation and reimbursement of expenses for the period commencing March 16, 2010 through and including May 31, 2010 (the “First Interim Fee Period”) in accordance with the Guidelines.

3. In respect of section A.1 of the Local Guidelines, I certify that:

- a. I have read the Application;
- b. to the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Local Guidelines and the UST Guidelines;
- c. the fees and disbursements sought are billed at rates in accordance with practices customarily employed by the Applicant and generally accepted by the Applicant’s clients; and
- d. in providing a reimbursable service, the Applicant does not make a profit on that service, whether the service is performed by the Applicant in-house or through a third party.

4. In respect of section A.2 of the Local Guidelines and as required by the Interim Compensation Order, I certify that the Applicant has complied with the provision requiring it to provide the appropriate notice parties, on a monthly basis, with a statement of the Applicant’s fees and disbursements accrued during the previous month, as set forth in the Interim Compensation Order.

5. In respect of section A.3 of the Local Guidelines, I certify that counsel for the Debtors, the United States Trustee for the Southern District of New York and the Chair of the Committee are each being provided with a copy of this Application.

Dated: August 5, 2010  
Washington, DC



Charles Bates

Bates White, LLC  
1300 Eye Street, NW  
Suite 600E  
Washington, DC 20005  
(202) 408-6110

*Asbestos Liability Consultants for the Official  
Committee of Unsecured Creditors of Motors  
Liquidation Co., (f/k/a General Motors Corp.) et  
al.*

**EXHIBIT B****Summary of Professionals**

<b><u>Timekeeper Name</u></b>	<b><u>Department</u></b>	<b><u>Title</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
Charles Bates	Environmental and Products Liability	Senior Partner	59.70	\$850.00	\$50,745.00
Charles Mullin	Environmental and Products Liability	Partner	8.40	\$625.00	\$5,250.00
Michael Brown	Environmental and Products Liability	Principal	.80	\$450.00	\$360.00
Andrew Evans	Environmental and Products Liability	Principal	5.20	\$425.00	\$2,210.00
Rachel Grinberg	Environmental and Products Liability	Manager	119.60	\$395.00	\$47,242.00
Christopher Wieman	Information Services	Manager	5.00	\$385.00	\$1,925.00
Jorge Gallardo-Garcia	Environmental and Products Liability	Manager	3.40	\$375.00	\$1,275.00
Peter Kelso	Environmental and Products Liability	Manager	2.50	\$375.00	\$937.50
Samantha Johnson	Environmental and Products Liability	Quality Assurance Specialist	15.00	\$325.00	\$4,875.00
Andra Ban	Environmental and Products Liability	Senior Consultant	53.00	\$325.00	\$2,372.50
Susan Coughlin	Environmental and Products Liability	Senior Consultant	41.50	\$335.00	\$13,902.50
William Robinson	Environmental and Products Liability	Consultant II	17.20	\$275.00	\$4,730.00
David Sendor	Environmental and Products Liability	Consultant II	34.50	\$295.00	\$10,177.50
Zachary Bolian	Environmental and Products Liability	Consultant I	75.40	\$255.00	\$19,227.00
Mary Huang	Environmental and Products Liability	Consultant I	27.80	\$255.00	\$7,089.00

<u>Timekeeper Name</u>	<u>Department</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Christopher Morrow	Environmental and Products Liability	Consultant I	44.90	\$255.00	\$11,449.50
<b>Total</b>			513.90		\$198,620.00

**EXHIBIT C**

**Summary and Detail of Disbursements**

<b>Description</b>	<b>Billed Amount</b>
Round trip train ticket for Charles Bates from Washington, DC to New York, NY for meeting with	\$383.00
Round trip train ticket for Rachel Grinberg from Washington, DC to New York, NY for meeting with Philip Bentley, counsel to the Committee	\$383.00
Taxi fare from Bates White office to the Union Station with Philip Bentley, counsel to the Committee	\$10.00
<b>Total</b>	<b>\$776.00</b>

**EXHIBIT D-1**

**Summary of Time by Billing Category**

<u>Subcategory Name</u>	<u>Hours</u>	<u>Fees</u>
Analysis	113.00	\$36,708.00
Consulting	208.70	\$64,596.50
Data Gathering and Processing	12.10	\$4,727.50
Expert	59.70	\$50,745.00
Research	70.40	\$22,394.00
Modeling	39.60	\$15,642.00
Project Management	10.40	\$3,807.00
<b>Total</b>	<b>513.90</b>	<b>\$198,620.00</b>

**EXHIBIT D-2**

**Detail of Time by Billing Category**

Analysis				
Date Incurred	Employee	Hours	Fees	Notes
3/22/2010	Mullin, Charles	0.50	\$ 312.50	Double collection on asbestos claims from perspective of a BK court
3/24/2010	Mullin, Charles	3.20	\$ 2,000.00	Interaction of solvent defendants share of liability and BK defendant shares
3/25/2010	Mullin, Charles	0.40	\$ 250.00	Interaction of BK and solvent defendant shares
3/29/2010	Mullin, Charles	0.60	\$ 375.00	Potential legal expert for treatment of bankrupt shares
4/2/2010	Mullin, Charles	0.70	\$ 437.50	Model of BK company share netof trusts
4/6/2010	Mullin, Charles	0.80	\$ 500.00	Model of BK valuation inclusive of trust monies
4/28/2010	Evans, Andrew	0.80	\$ 340.00	Input on establishing general model framework
4/29/2010	Mullin, Charles	0.70	\$ 437.50	Formulation of general model
4/30/2010	Evans, Andrew	0.60	\$ 255.00	Additional work supporting team on applicaitons of general model in BK context
5/3/2010	Robinson, William	3.00	\$ 825.00	Lawyer master database review and updates
5/4/2010	Robinson, William	3.20	\$ 880.00	Clean names in master database
5/4/2010	Robinson, William	3.00	\$ 825.00	Update universal tests table for master database
5/5/2010	Robinson, William	2.50	\$ 687.50	Review local tests files
5/6/2010	Brown, Michael	0.60	\$ 270.00	advise regarding potential information sources on settlement values
5/7/2010	Morrow, Christopher	1.30	\$ 331.50	Quality control check of trust offset database.
5/10/2010	Ban, Andra	3.20	\$ 1,040.00	Analyze data in claims Database
5/10/2010	Ban, Andra	3.00	\$ 975.00	Analyze data in claims Database: continued
5/10/2010	Ban, Andra	2.80	\$ 910.00	Continued to analyze data in claims Database
5/11/2010	Ban, Andra	0.70	\$ 227.50	Review supplemental data sources
5/13/2010	Ban, Andra	3.50	\$ 1,137.50	Analyze data in master DB
5/13/2010	Ban, Andra	2.00	\$ 650.00	Analyze data in master DB: continued
5/14/2010	Ban, Andra	3.50	\$ 1,137.50	Forecast asbestos liabilities by disease
5/14/2010	Ban, Andra	3.50	\$ 1,137.50	Continued forecast asbestos liabilities by disease
5/14/2010	Ban, Andra	2.00	\$ 650.00	Review of trends in litigation environment
5/14/2010	Morrow, Christopher	3.30	\$ 841.50	Quality control check of work history cases in the settlement tool
5/14/2010	Morrow, Christopher	3.70	\$ 943.50	Quality control check of products and site identifications settlement tool
5/17/2010	Ban, Andra	4.50	\$ 1,462.50	Prepare to match GM data to supplemental sources--dockets
5/17/2010	Ban, Andra	4.00	\$ 1,300.00	Prepare to match GM data to supplemental sources--master DB
5/17/2010	Morrow, Christopher	3.50	\$ 892.50	Reviewing bankruptcy trust annual report update.
5/18/2010	Ban, Andra	3.50	\$ 1,137.50	Prepare to match GM data to supplemental sources--CCR
5/18/2010	Ban, Andra	3.30	\$ 1,072.50	Prepare to match GM data to supplemental sources--namings
5/18/2010	Ban, Andra	2.20	\$ 715.00	Continued to prepare to match GM data to supplemental sources--namings
5/18/2010	Morrow, Christopher	0.90	\$ 229.50	Reviewing trust offset exposure details for cases
5/19/2010	Ban, Andra	2.00	\$ 650.00	Prepare to match GM data to supplemental sources--Manville
5/19/2010	Grinberg, Rachel	1.00	\$ 395.00	review of settlement amount patterns in the debtor's data
5/19/2010	Grinberg, Rachel	1.00	\$ 395.00	review of filing patterns in the debtor's data
5/20/2010	Ban, Andra	1.00	\$ 325.00	searching for inputs to Verdicts DB
5/20/2010	Ban, Andra	4.50	\$ 1,462.50	update and analysis of Verdicts DB
5/20/2010	Morrow, Christopher	1.00	\$ 255.00	Form development, product table.
5/21/2010	Ban, Andra	3.80	\$ 1,235.00	continued update and analysis of Verdicts DB
5/21/2010	Morrow, Christopher	2.80	\$ 714.00	Annual trust asset and payment summary (2009 Updates).

5/24/2010	Robinson, William	3.00	\$ 825.00	Updated master database utilities
5/25/2010	Robinson, William	2.50	\$ 687.50	Continued updating master database utilities
5/26/2010	Gallardo-Garcia, Jorge	0.80	\$ 300.00	Presentation review and discussion.
5/26/2010	Morrow, Christopher	3.50	\$ 892.50	Building new solvent product data entry and analysis functionality into trust offset tool.
5/26/2010	Morrow, Christopher	1.70	\$ 433.50	Building new solvent product data entry and analysis functionality into trust offset tool, continued
5/26/2010	Mullin, Charles	0.70	\$ 437.50	Estimation methodology review
5/27/2010	Morrow, Christopher	1.20	\$ 306.00	Updating products functionality.
5/28/2010	Mullin, Charles	0.80	\$ 500.00	Assessment of discovery requests
5/31/2010	Morrow, Christopher	3.70	\$ 943.50	Entering solvent defendant product information and updating tool.
5/31/2010	Morrow, Christopher	3.00	\$ 765.00	Reviewing cases for solvent defendant product identification.

**Consulting**

<b>Date Incurred</b>	<b>Employee</b>	<b>Hours</b>	<b>Fees</b>	<b>Notes</b>
3/24/2010	Grinberg, Rachel	0.50	\$ 197.50	worked on project work streams
3/24/2010	Grinberg, Rachel	0.50	\$ 197.50	continued work on project work streams
3/25/2010	Grinberg, Rachel	0.50	\$ 197.50	brainstorm modeling of shares of bankrupt defendants
3/25/2010	Grinberg, Rachel	0.30	\$ 118.50	debrief re analysis and research tasks
3/25/2010	Grinberg, Rachel	0.70	\$ 276.50	call with Philip Bentley to discuss ibackground research and general model prototype
3/26/2010	Grinberg, Rachel	0.80	\$ 316.00	worked on background research
3/26/2010	Grinberg, Rachel	0.30	\$ 118.50	continued work on background research
3/26/2010	Grinberg, Rachel	0.40	\$ 158.00	work on background research continued
3/26/2010	Grinberg, Rachel	0.30	\$ 118.50	preparing documents for client
3/29/2010	Grinberg, Rachel	0.30	\$ 118.50	prep for discussion re legal expert candidate
3/29/2010	Grinberg, Rachel	0.20	\$ 79.00	reviewed legal expert candidate information
3/31/2010	Grinberg, Rachel	0.50	\$ 197.50	background research follow up
4/1/2010	Grinberg, Rachel	0.80	\$ 316.00	worked on background research
4/2/2010	Grinberg, Rachel	1.70	\$ 671.50	studied Asarco expert report
4/2/2010	Grinberg, Rachel	0.90	\$ 355.50	worked on background research
4/2/2010	Grinberg, Rachel	0.90	\$ 355.50	compiled materials on the candidate for legal expert
4/12/2010	Grinberg, Rachel	2.30	\$ 908.50	modeling of meso values
4/12/2010	Grinberg, Rachel	1.30	\$ 513.50	worked on background research
4/12/2010	Sendor, David	1.90	\$ 560.50	Mesothelioma claimants trust offset modeling
4/29/2010	Grinberg, Rachel	1.00	\$ 395.00	worked on the outline of the analytical building blocks got the general model
5/3/2010	Sendor, David	0.70	\$ 206.50	QC trust offset model
5/3/2010	Sendor, David	2.00	\$ 590.00	added actual defendants to trust offsets naming model
5/3/2010	Sendor, David	1.00	\$ 295.00	update trust offset model
5/5/2010	Grinberg, Rachel	1.00	\$ 395.00	worked on conceptualizing of upcoming work streams
5/11/2010	Grinberg, Rachel	0.50	\$ 197.50	preparation for call with Philip Bentley
5/11/2010	Grinberg, Rachel	0.20	\$ 79.00	call with Philip Bentley re data from the Debtor and upcoming meeting in NYC
5/11/2010	Grinberg, Rachel	0.90	\$ 355.50	worked on presentation on the modeling approach
5/11/2010	Grinberg, Rachel	0.40	\$ 158.00	worked on downloading of the Motors Liquidation data;
5/12/2010	Grinberg, Rachel	2.00	\$ 790.00	worked on General Model methodology deck
5/12/2010	Grinberg, Rachel	2.20	\$ 869.00	continued working on General Model methodology deck
5/12/2010	Huang, Mary	0.20	\$ 51.00	Review received data files
5/12/2010	Huang, Mary	1.50	\$ 382.50	Explore raw claims data
5/12/2010	Huang, Mary	1.70	\$ 433.50	Clean claims data
5/12/2010	Huang, Mary	0.70	\$ 178.50	Combine data to construct claims database
5/12/2010	Huang, Mary	0.60	\$ 153.00	Clean dates and amounts
5/12/2010	Huang, Mary	1.00	\$ 255.00	Preliminary analysis of claims data
5/12/2010	Sendor, David	0.50	\$ 147.50	loaded data into STATA
5/12/2010	Sendor, David	0.80	\$ 236.00	reviewed raw data
5/12/2010	Sendor, David	0.70	\$ 206.50	prepared working analysis file
5/12/2010	Sendor, David	0.30	\$ 88.50	prepared list of tasks for working data
5/12/2010	Sendor, David	1.30	\$ 383.50	cleaned basic variables
5/12/2010	Sendor, David	1.20	\$ 354.00	cleaned data
5/12/2010	Sendor, David	1.10	\$ 324.50	reviewed main data issues
5/12/2010	Wieman, Christopher	0.70	\$ 269.50	corrupted zip file analysis and unzipping
5/12/2010	Wieman, Christopher	0.50	\$ 192.50	continue corrupted XLSX file analysis and attempts to extract valid data

5/12/2010	Wieman, Christopher	1.50	\$ 577.50	continue corrupted XLSX file analysis and attempts to extract valid data, write script for reformatting XML of Sheet1
5/12/2010	Wieman, Christopher	1.80	\$ 693.00	corrupted XLSX file analysis and attempts to extract valid data
5/13/2010	Grinberg, Rachel	3.00	\$ 1,185.00	worked on the presentation for upcoming client meeting
5/13/2010	Huang, Mary	0.50	\$ 127.50	Organize processing scripts
5/13/2010	Huang, Mary	0.70	\$ 178.50	Construct data dictionary
5/13/2010	Huang, Mary	1.40	\$ 357.00	QC of data soundness
5/13/2010	Huang, Mary	1.60	\$ 408.00	Import 2009 update data files
5/13/2010	Huang, Mary	0.90	\$ 229.50	Document data file contents
5/13/2010	Huang, Mary	0.30	\$ 76.50	Combine files for preliminary claims database
5/13/2010	Huang, Mary	0.40	\$ 102.00	Summarize data issues
5/13/2010	Huang, Mary	0.40	\$ 102.00	Update processing scripts
5/13/2010	Sendor, David	0.80	\$ 236.00	reviewed data changes
5/13/2010	Sendor, David	2.00	\$ 590.00	analyzed data variables
5/13/2010	Sendor, David	1.20	\$ 354.00	prepare cleaning tables
5/13/2010	Wieman, Christopher	0.50	\$ 192.50	continue corrupted XLSX file analysis and attempts to extract valid data - script completed, XML data import still failing
5/14/2010	Huang, Mary	1.00	\$ 255.00	Review accuracy of claims data
5/14/2010	Huang, Mary	0.30	\$ 76.50	Update data dictionary
5/14/2010	Huang, Mary	0.60	\$ 153.00	Load in 2009 pending claims
5/14/2010	Huang, Mary	0.20	\$ 51.00	Review 2009 pending claims
5/14/2010	Huang, Mary	1.00	\$ 255.00	Explore 2009 pending claims
5/14/2010	Huang, Mary	0.90	\$ 229.50	Clean state variable in claims data
5/14/2010	Huang, Mary	1.00	\$ 255.00	Clean county variable in claims data
5/14/2010	Huang, Mary	1.80	\$ 459.00	Claims data processing
5/14/2010	Sendor, David	1.00	\$ 295.00	analyzed raw data and data dictionary
5/14/2010	Sendor, David	1.00	\$ 295.00	prepare cleaned data
5/14/2010	Sendor, David	0.80	\$ 236.00	Pending claims analysis
5/16/2010	Huang, Mary	0.70	\$ 178.50	Clean county variable
5/16/2010	Huang, Mary	0.30	\$ 76.50	Clean venue date variables
5/16/2010	Huang, Mary	0.30	\$ 76.50	Consolidate venue data for merge to claims data
5/17/2010	Bolian, Zachary	0.30	\$ 76.50	Outlined objective with regard to deduplicating disposition variables across tables.
5/17/2010	Bolian, Zachary	0.20	\$ 51.00	QC import and preliminary analysis scripts.
5/17/2010	Bolian, Zachary	0.20	\$ 51.00	Reviewed data dictionary for explanation of disposition flags.
5/17/2010	Bolian, Zachary	0.50	\$ 127.50	Perform diagnostics on raw data to determine variations in disposition values across data sources.
5/17/2010	Bolian, Zachary	0.40	\$ 102.00	QC clean scripts for data to understand the preference algorithms used.
5/17/2010	Bolian, Zachary	0.20	\$ 51.00	Reviewed and QCed merge and reconciliation scripts.
5/17/2010	Bolian, Zachary	0.40	\$ 102.00	Began writing code to test and reconcile disposition variables across data sources.
5/17/2010	Bolian, Zachary	0.30	\$ 76.50	Looked through process to determine where I could easily reincorporate the lawyer variable in the data.
5/17/2010	Bolian, Zachary	0.60	\$ 153.00	Added code that preferences disposition variables by their level of specificity.
5/17/2010	Bolian, Zachary	0.40	\$ 102.00	Began coding to clean and preference law firm information.
5/17/2010	Bolian, Zachary	0.30	\$ 76.50	Created diagnostic tests on variable duplicate to determine amount of difficulty caused by misspelled or inconsistently entered law firm observations.

5/17/2010	Bolian, Zachary	0.80	\$ 204.00	Implementing a lawyer name cleaning algorithm to the script to reduce spelling errors and other inconsistencies which lead to duplication.
5/17/2010	Bolian, Zachary	0.50	\$ 127.50	Run through status of variable reconciliation and plan addition of other useful variables for analysis data set.
5/17/2010	Bolian, Zachary	0.50	\$ 127.50	Found standardization code for data set and outlined potential outliers to standard code.
5/17/2010	Bolian, Zachary	0.40	\$ 102.00	Generated cross tabs and tables for QC to ensure data was being treated consistently and accurately.
5/17/2010	Bolian, Zachary	0.70	\$ 178.50	Set up structure to construct the analysis data set.
5/17/2010	Bolian, Zachary	0.80	\$ 204.00	Developed algorithm to create big lawyer and big state variables.
5/17/2010	Bolian, Zachary	0.50	\$ 127.50	Adding details to analysis data set script to drop erroneous variables and to label all variables appropriately.
5/17/2010	Bolian, Zachary	0.60	\$ 153.00	Added code to reconcile last groups of disposition, amount, and endate variables that were suspicious.
5/17/2010	Grinberg, Rachel	1.10	\$ 434.50	discussed claims data work streams
5/17/2010	Huang, Mary	0.50	\$ 127.50	Update data processing task list
5/17/2010	Huang, Mary	0.20	\$ 51.00	Review outstanding data processing tasks
5/17/2010	Huang, Mary	0.30	\$ 76.50	Add processed venue data to combined claims data
5/17/2010	Huang, Mary	0.50	\$ 127.50	Reconcile amount variable in combined claims data
5/17/2010	Huang, Mary	0.50	\$ 127.50	QC the preliminary combined claims data
5/17/2010	Sendor, David	1.00	\$ 295.00	clean disposition
5/17/2010	Sendor, David	0.50	\$ 147.50	GM data review
5/17/2010	Sendor, David	0.90	\$ 265.50	review next steps for data cleaning
5/17/2010	Sendor, David	0.50	\$ 147.50	review analysis dataset
5/17/2010	Sendor, David	0.80	\$ 236.00	team tasks for preparing dataset
5/18/2010	Bolian, Zachary	0.40	\$ 102.00	Generated data cuts to examine the underlying data of 1% of data with disposition information that appears to be in conflict.
5/18/2010	Bolian, Zachary	0.30	\$ 76.50	Reading through master lawyer database cleaning utility to introduce full lawyer cleaning into the process.
5/18/2010	Bolian, Zachary	0.70	\$ 178.50	Made adjustments to use name field from claimant table rather than indemnity to increase population and specificity.
5/18/2010	Bolian, Zachary	0.70	\$ 178.50	Updated lawyer fields to categorize unknown lawyer as Z_UNK and cleaned name of lawfirm that would become a big_firm.
5/18/2010	Bolian, Zachary	0.50	\$ 127.50	Reviewed how to use master lawyer cleaning utility.
5/18/2010	Bolian, Zachary	0.50	\$ 127.50	Incorporated mater lawyer cleaning utility into our data process.
5/18/2010	Bolian, Zachary	0.40	\$ 102.00	Trouble shooting issues with loading of mater lawyer table from SQL database.
5/18/2010	Bolian, Zachary	0.20	\$ 51.00	Cleaning lawyer field with master utility.
5/18/2010	Bolian, Zachary	1.10	\$ 280.50	Handmatching lawyer variables with those in master database.
5/18/2010	Bolian, Zachary	1.00	\$ 255.00	Changing code in data process to allow lawyer encoding and label values correctly.
5/18/2010	Bolian, Zachary	0.40	\$ 102.00	Adjusting size variable to indicate size grouping of claim.
5/18/2010	Bolian, Zachary	0.40	\$ 102.00	Adding code to preserve raw exposure and occupation information.
5/18/2010	Bolian, Zachary	0.20	\$ 51.00	Debug error in code used to reincorporate occupation field.
5/18/2010	Bolian, Zachary	0.60	\$ 153.00	Browsed occupation variables to plan best method of creating standard occupation flags for analysis.
5/18/2010	Bolian, Zachary	0.20	\$ 51.00	Updated labels for exposure variables in analysis database.

5/18/2010	Bolian, Zachary	0.20	\$ 51.00	Review status and question of various tasks for day and wrote email to team.
5/18/2010	Evans, Andrew	0.40	\$ 170.00	Materials for Rachel on motivation of general model
5/18/2010	Huang, Mary	0.20	\$ 51.00	QC the analysis database
5/18/2010	Huang, Mary	1.50	\$ 382.50	Clean claimant names
5/18/2010	Huang, Mary	2.20	\$ 561.00	Continue cleaning claimant names
5/18/2010	Sendor, David	0.50	\$ 147.50	review cleaning
5/18/2010	Sendor, David	1.00	\$ 295.00	State cleaning
5/19/2010	Bolian, Zachary	0.30	\$ 76.50	Making adjustments to big lawyer variable labeling and size variable definition and number of states from the 10 to 4.
5/19/2010	Bolian, Zachary	0.70	\$ 178.50	QC of occupation flag script.
5/19/2010	Bolian, Zachary	0.30	\$ 76.50	Debugged code that removed occ flags from the process.
5/19/2010	Bolian, Zachary	0.30	\$ 76.50	Made final adjustments to include occ_flags with variables labels and reran the process.
5/19/2010	Bolian, Zachary	2.50	\$ 637.50	Developed script to clean occupation and generate standard occupation flags.
5/19/2010	Bolian, Zachary	0.20	\$ 51.00	Manually review lawyer list in analysis data set to ensure no significant matching was overlooked.
5/19/2010	Bolian, Zachary	0.80	\$ 204.00	Adding code to correct treatment of inconsistently entered names.
5/19/2010	Bolian, Zachary	0.20	\$ 51.00	QC changes made to name cleaning script.
5/19/2010	Bolian, Zachary	0.30	\$ 76.50	Changing code to incorporate deceased flag from claimant table and adjust labeling of unknown state.
5/19/2010	Bolian, Zachary	0.60	\$ 153.00	Finding spots in code where change in name cleaning algorithm broke process and fixed them.
5/19/2010	Bolian, Zachary	1.40	\$ 357.00	Began writing reconciliation code between two name cleaning scripts.
5/19/2010	Bolian, Zachary	0.60	\$ 153.00	Continued with name cleaning code reconciliation.
5/19/2010	Grinberg, Rachel	0.70	\$ 276.50	review of data request slides
5/19/2010	Huang, Mary	0.20	\$ 51.00	Explore exposure sites in claims data
5/19/2010	Huang, Mary	1.00	\$ 255.00	Add variable to analysis database
5/19/2010	Huang, Mary	0.20	\$ 51.00	Edit claimant name cleaning script
5/20/2010	Bolian, Zachary	0.20	\$ 51.00	Reviewing the cleaning of raw variables included in the analysis database.
5/20/2010	Bolian, Zachary	0.30	\$ 76.50	Went through the data dictionary again to determine whether there were any additional variables that it would be useful to incorporate.
5/20/2010	Bolian, Zachary	0.30	\$ 76.50	Writing code to pull summary breakdown information from analysis data set.
5/20/2010	Bolian, Zachary	0.80	\$ 204.00	Writing code to produce summary tables by disease and amount.
5/20/2010	Bolian, Zachary	0.60	\$ 153.00	Adding portion to code that outputs claims by disease and quarter table.
5/20/2010	Bolian, Zachary	1.00	\$ 255.00	Compiled preliminary slides of summary tables.
5/20/2010	Bolian, Zachary	0.40	\$ 102.00	Running different tabs on the occ flags to ensure accuracy.
5/20/2010	Bolian, Zachary	0.10	\$ 25.50	Preparing email about database status.
5/20/2010	Grinberg, Rachel	0.90	\$ 355.50	compiled the list of variables to request from the Debtor if available
5/21/2010	Bolian, Zachary	0.60	\$ 153.00	Review slides and outline better breakdown.
5/21/2010	Bolian, Zachary	0.50	\$ 127.50	Investigated large unknown disease claims by searching for them in the mater database.
5/21/2010	Bolian, Zachary	0.50	\$ 127.50	Modifying old slides and creating new ones.

5/21/2010	Bolian, Zachary	0.30	\$ 76.50	Brainstorm methods to improve the occupation flag creation process.
5/21/2010	Bolian, Zachary	0.20	\$ 51.00	Reviewing most prevalent occupations and determining correct flags to generate.
5/21/2010	Bolian, Zachary	0.30	\$ 76.50	Began making appropriate changes to occupation flag algorithm.
5/21/2010	Bolian, Zachary	0.50	\$ 127.50	Making changes to the occupation flag algorithm.
5/21/2010	Bolian, Zachary	0.50	\$ 127.50	Manually reviewing the occupations that were not given a flag by the algorithm.
5/21/2010	Bolian, Zachary	0.20	\$ 51.00	Re-wrote code to label new occupation flags appropriately.
5/21/2010	Bolian, Zachary	0.70	\$ 178.50	Debugging issues with the specification of the occ_general flag.
5/21/2010	Bolian, Zachary	0.20	\$ 51.00	Final QC of occ flags.
5/21/2010	Bolian, Zachary	0.30	\$ 76.50	Modifying code to incorporate all raw variables.
5/21/2010	Bolian, Zachary	1.20	\$ 306.00	Writing a script to array venue information so that we can include it in the analysis database.
5/21/2010	Bolian, Zachary	0.30	\$ 76.50	Wrote script to clean and incorporate smoker variables into analysis database.
5/21/2010	Bolian, Zachary	0.10	\$ 25.50	Fixing bugs that prevented code from running all the way through to incorporate smoker variables.
5/21/2010	Grinberg, Rachel	1.70	\$ 671.50	slides on summary of the debtors' data
5/21/2010	Huang, Mary	0.50	\$ 127.50	Review processing of occupation variable
5/21/2010	Sendor, David	0.50	\$ 147.50	occupation cleaning
5/23/2010	Bolian, Zachary	1.20	\$ 306.00	Adding code to clean, reconcile and label court specific variables correctly.
5/24/2010	Bolian, Zachary	0.20	\$ 51.00	Investigating observations with no lawyer value specified in the lawyer field.
5/24/2010	Bolian, Zachary	0.20	\$ 51.00	Looked through notes of which claims should be browsed in master database.
5/24/2010	Bolian, Zachary	1.00	\$ 255.00	Walking through lawyer cleaning algorithm to determine where initial standardization is performed.
5/24/2010	Bolian, Zachary	0.80	\$ 204.00	Writing SQL queries to merge master tables to include disease and name.
5/24/2010	Bolian, Zachary	0.40	\$ 102.00	Creating an excel table to translate high valued unknown disease claims to values they hold in master database.
5/24/2010	Bolian, Zachary	0.30	\$ 76.50	Wrote code to incorporate hand matched disease information into database.
5/24/2010	Bolian, Zachary	0.20	\$ 51.00	Tested code to incorporate hand matched disease information to database.
5/24/2010	Bolian, Zachary	0.20	\$ 51.00	Added additional names to claimant disease table after browsing master database at lower threshold.
5/24/2010	Bolian, Zachary	0.40	\$ 102.00	Updated analysis script that produces tables for power point input to include new information.
5/24/2010	Bolian, Zachary	0.30	\$ 76.50	Updated power point slides to include new information.
5/24/2010	Bolian, Zachary	2.10	\$ 535.50	Debugging lawyer cleaning name suggestions.
5/24/2010	Bolian, Zachary	0.10	\$ 25.50	Composing update email.
5/24/2010	Bolian, Zachary	0.30	\$ 76.50	Looked through various lawyer translation outputs to look for other debugging clues.
5/24/2010	Bolian, Zachary	0.40	\$ 102.00	Handmatching of cleaned lawyer field.
5/24/2010	Bolian, Zachary	0.80	\$ 204.00	Debugging process issue with unincorporated lawyer fields.
5/24/2010	Bolian, Zachary	0.30	\$ 76.50	Testing modification to lawyer cleaning algorithm.

5/24/2010	Grinberg, Rachel	2.50	\$ 987.50	worked on differences in claims valuation between the general and the partial models
5/24/2010	Grinberg, Rachel	2.40	\$ 948.00	worked on tabulations of filings and settlement amounts from the debtor's claims data
5/24/2010	Sendor, David	1.00	\$ 295.00	lawyer cleaning algorithm
5/25/2010	Bolian, Zachary	0.60	\$ 153.00	Browsing trust value and tort value database to familiarize myself with content.
5/25/2010	Bolian, Zachary	0.80	\$ 204.00	Ran tabs on data to guide summary table construction strategy.
5/25/2010	Bolian, Zachary	0.20	\$ 51.00	Ran a couple more empirical tests on new reallocate to insolvents code.
5/25/2010	Bolian, Zachary	0.40	\$ 102.00	Began setting up scripts to create trust vs tort analysis.
5/25/2010	Bolian, Zachary	0.50	\$ 127.50	Wrote code to load pertinent variables from trust database into stata format.
5/25/2010	Bolian, Zachary	0.20	\$ 51.00	Created translation table between source variable and company.
5/25/2010	Bolian, Zachary	0.30	\$ 76.50	Matched companies that appear in both the tort and trust databases.
5/25/2010	Bolian, Zachary	0.70	\$ 178.50	Wrote code to create input file with valid tort fields.
5/25/2010	Bolian, Zachary	0.30	\$ 76.50	Adding code to incorporate the translations made by hand to the data process.
5/25/2010	Bolian, Zachary	0.30	\$ 76.50	Reviewing USG data to determine which analysis variables are of interest for this analysis.
5/25/2010	Bolian, Zachary	0.40	\$ 102.00	Writing code to incorporate USG data into dataset for analysis.
5/25/2010	Bolian, Zachary	0.20	\$ 51.00	Making excel file to translate names for bankruptcies database to get correct bankruptcy date.
5/25/2010	Bolian, Zachary	0.50	\$ 127.50	Created code to standardize and consolidate bankruptcy information.
5/25/2010	Bolian, Zachary	1.10	\$ 280.50	Reviewed corporate histories to check data for special treatment needs.
5/25/2010	Bolian, Zachary	0.30	\$ 76.50	Adjusting code based on findings specific to defendants in data.
5/25/2010	Bolian, Zachary	0.40	\$ 102.00	Wrote script to generate average settlement output in tort system.
5/25/2010	Bolian, Zachary	0.40	\$ 102.00	Wrote script that creates summary output table of tort vs trust worlds.
5/25/2010	Bolian, Zachary	0.20	\$ 51.00	Review outputted results.
5/25/2010	Bolian, Zachary	0.50	\$ 127.50	Adding code to incorporate GAF into analysis.
5/25/2010	Evans, Andrew	0.20	\$ 85.00	Other case trust discovery materials for Motors
5/25/2010	Grinberg, Rachel	1.20	\$ 474.00	worked on claims valuation
5/25/2010	Grinberg, Rachel	1.50	\$ 592.50	worked on trust compilation of trust assets
5/25/2010	Grinberg, Rachel	3.00	\$ 1,185.00	worked on comparison of trust and tort values
5/25/2010	Sendor, David	1.30	\$ 383.50	trust versus tort values analysis
5/25/2010	Sendor, David	1.70	\$ 501.50	trust versus tort value analysis
5/26/2010	Bolian, Zachary	1.10	\$ 280.50	Generated various comparison tables to better understand special cases in analysis.
5/26/2010	Bolian, Zachary	0.60	\$ 153.00	Wrote SQL query to pull subset of lawyers with test conditions similar to those in data for testing.
5/26/2010	Bolian, Zachary	0.30	\$ 76.50	Assymble lawyer test file to run through cleaning process for QC.
5/26/2010	Bolian, Zachary	0.50	\$ 127.50	Review of special cases in trust/tort analysis.
5/26/2010	Bolian, Zachary	0.80	\$ 204.00	Wrote code to include more complete Babcock dataset.

5/26/2010	Bolian, Zachary	0.50	\$ 127.50	Wrote code to include payment percentages from bankruptcy database in to analysis.
5/26/2010	Bolian, Zachary	0.20	\$ 51.00	Review companies with intuitively odd comparison.
5/26/2010	Bolian, Zachary	0.60	\$ 153.00	Debugging lawyer cleaning and standardization.
5/26/2010	Bolian, Zachary	1.00	\$ 255.00	Review treatment of tort claims for analysis.
5/26/2010	Bolian, Zachary	0.60	\$ 153.00	Review TDP for scheduled trust value calculation for analysis.
5/26/2010	Bolian, Zachary	1.10	\$ 280.50	Updating analysis to include only funded claims.
5/26/2010	Bolian, Zachary	0.30	\$ 76.50	Reviewing TDP of trusts in analysis.
5/26/2010	Bolian, Zachary	0.70	\$ 178.50	Review previous reports issued for observations in analysis.
5/26/2010	Bolian, Zachary	0.20	\$ 51.00	Review analysis process steps.
5/26/2010	Bolian, Zachary	0.70	\$ 178.50	Create summary slide with table of analysis results.
5/26/2010	Evans, Andrew	1.70	\$ 722.50	Work on data discovery request framing and positioning
5/26/2010	Grinberg, Rachel	0.50	\$ 197.50	reviewed trust assets and face/tort values
5/26/2010	Grinberg, Rachel	1.50	\$ 592.50	reviewed Peterson Grace report
5/26/2010	Grinberg, Rachel	1.00	\$ 395.00	worked on ACC's expert claims valuation
5/26/2010	Grinberg, Rachel	2.00	\$ 790.00	worked on methodology to value pending stock
5/26/2010	Grinberg, Rachel	2.30	\$ 908.50	worked on presentation of claims valuation methodologies
5/26/2010	Sendor, David	0.50	\$ 147.50	review amount of money in various databases
5/26/2010	Sendor, David	0.70	\$ 206.50	QC settlement database values
5/26/2010	Sendor, David	0.90	\$ 265.50	defendant settlement database
5/26/2010	Sendor, David	1.30	\$ 383.50	settlement database analysis
5/26/2010	Sendor, David	1.50	\$ 442.50	prepared lawyer analysis
5/27/2010	Bolian, Zachary	0.70	\$ 178.50	Update lawyer cleaning algorithm with additional test.
5/27/2010	Bolian, Zachary	0.20	\$ 51.00	Review occupation flags to check for misspelled occupation fields.
5/27/2010	Bolian, Zachary	0.10	\$ 25.50	Updated occupation code to account for misspellings.
5/27/2010	Bolian, Zachary	1.20	\$ 306.00	Investigating underlying data for disposition QC.
5/27/2010	Bolian, Zachary	1.00	\$ 255.00	Review underlying data to QC disposition reconciliation.
5/27/2010	Bolian, Zachary	0.50	\$ 127.50	Rview of claims with amount of zero and settled disposition.
5/27/2010	Bolian, Zachary	0.30	\$ 76.50	Brainstorming alternative data cuts to analyze disposition reconciliation.
5/27/2010	Bolian, Zachary	0.70	\$ 178.50	Documented special disposition value cases.
5/27/2010	Bolian, Zachary	1.20	\$ 306.00	Wrote code to more systematically analyze special disposition values.
5/27/2010	Grinberg, Rachel	1.50	\$ 592.50	prepared materials for the client presentation
5/27/2010	Grinberg, Rachel	0.90	\$ 355.50	travel to NYC
5/27/2010	Grinberg, Rachel	2.10	\$ 829.50	worked on presentation to Phil Bentley
5/27/2010	Grinberg, Rachel	1.50	\$ 592.50	continued travel
5/27/2010	Grinberg, Rachel	3.00	\$ 1,185.00	meeting with Philip Bentley and David Blabey
5/27/2010	Grinberg, Rachel	4.40	\$ 1,738.00	travel from NYC
5/27/2010	Sendor, David	1.60	\$ 472.00	lawyer cleaning code review
5/28/2010	Bolian, Zachary	0.30	\$ 76.50	Added code to import raw poc data.
5/28/2010	Bolian, Zachary	1.00	\$ 255.00	Browsing data to identify key variables.
5/28/2010	Bolian, Zachary	0.60	\$ 153.00	Reviewing data for cleaning needs.
5/28/2010	Bolian, Zachary	0.50	\$ 127.50	Developed cleaning algorithm for address field.
5/28/2010	Bolian, Zachary	0.50	\$ 127.50	Began incorporating lawyer cleaning utility to POC scripts.
5/28/2010	Bolian, Zachary	0.20	\$ 51.00	QC output of lawyer cleaning algorithm.
5/28/2010	Bolian, Zachary	0.60	\$ 153.00	Update code to reflect modifications to lawyer cleaning algorithm.
5/28/2010	Bolian, Zachary	1.40	\$ 357.00	Developing name cleaning algorithm for POC dataset.
5/28/2010	Bolian, Zachary	0.50	\$ 127.50	Testing name cleaning algorithm for POC data.
5/28/2010	Bolian, Zachary	1.10	\$ 280.50	Updating name cleaning algorithm based on test results.

5/28/2010	Bolian, Zachary	0.40	\$ 102.00	Review results of algorithm modification.
5/28/2010	Bolian, Zachary	0.50	\$ 127.50	Debugging replacement code of naming algorithm.
5/28/2010	Bolian, Zachary	0.50	\$ 127.50	Debugging lawyer standardization.
5/28/2010	Evans, Andrew	1.30	\$ 552.50	Motivation, justification, and precedents for discovery
5/28/2010	Grinberg, Rachel	0.70	\$ 276.50	debrief on meeting with Phil Bentley
5/28/2010	Grinberg, Rachel	0.80	\$ 316.00	worked on notes from meeting with Phil Bentley
5/28/2010	Grinberg, Rachel	0.80	\$ 316.00	worked on POC data

**Data Gathering & Processing**

<b>Date Incurred</b>	<b>Employee</b>	<b>Hours</b>	<b>Fees</b>	<b>Notes</b>
5/13/2010	Grinberg, Rachel	2.10	\$ 829.50	preliminary review of Debtor's claims data
5/14/2010	Grinberg, Rachel	1.00	\$ 395.00	overview of tables and databases of Debtor's claims
5/17/2010	Grinberg, Rachel	0.90	\$ 355.50	analyzed disposition fields in the Debtor's claims data
5/18/2010	Grinberg, Rachel	0.70	\$ 276.50	reviewed prelim database of Debtor's claims
5/19/2010	Grinberg, Rachel	0.50	\$ 197.50	overview of processed fields in the Debtor's claims data
5/19/2010	Grinberg, Rachel	1.30	\$ 513.50	overview of exposure related fields in the Debtor's claims data
5/21/2010	Grinberg, Rachel	1.20	\$ 474.00	overview of occupation field in the debtors' claims data
5/24/2010	Gallardo-Garcia, Jorge	0.70	\$ 262.50	Review lawyer cleaning scripts.
5/24/2010	Grinberg, Rachel	1.00	\$ 395.00	worked on Debtor's claims data - lawyer field standardization
5/25/2010	Gallardo-Garcia, Jorge	0.70	\$ 262.50	Discuss friction products forecasts and incidence curve for forecast.
5/25/2010	Grinberg, Rachel	0.80	\$ 316.00	analyzed additional fields in the claims data
5/26/2010	Gallardo-Garcia, Jorge	0.50	\$ 187.50	Review lawyer cleaning code and debug.
5/26/2010	Gallardo-Garcia, Jorge	0.70	\$ 262.50	Discuss trust TDP values.

**Expert Time**

Date Incurred	Employee	Hours	Fees	Notes
3/23/2010	Bates, Charles	1.00	\$ 850.00	GM prep for call
3/23/2010	Bates, Charles	1.70	\$ 1,445.00	prep for client call w/Philip Bentley to discuss project scope
3/23/2010	Bates, Charles	0.50	\$ 425.00	call with Philip Bentley to discuss project scope
3/24/2010	Bates, Charles	1.30	\$ 1,105.00	GM. evaluate potential data requests
3/24/2010	Bates, Charles	0.50	\$ 425.00	GM: work on model design
3/24/2010	Bates, Charles	0.40	\$ 340.00	GM: plan data request
3/24/2010	Bates, Charles	0.60	\$ 510.00	GM: work on background product research
3/24/2010	Bates, Charles	0.40	\$ 340.00	GM: work on declaration
3/25/2010	Bates, Charles	0.50	\$ 425.00	GM work on modeling approach
3/25/2010	Bates, Charles	0.50	\$ 425.00	GM work on modeling approach
3/25/2010	Bates, Charles	0.40	\$ 340.00	GM: Discovery precedents research
3/25/2010	Bates, Charles	0.50	\$ 425.00	GM start background research project
3/25/2010	Bates, Charles	0.30	\$ 255.00	prep for client call w/Philip Bentley to discuss initial work streams
3/25/2010	Bates, Charles	0.70	\$ 595.00	client call with Philip Bentley to discuss initial work streams
3/29/2010	Bates, Charles	0.50	\$ 425.00	review names for legal expert
3/31/2010	Bates, Charles	1.00	\$ 850.00	work on model approaches
4/1/2010	Bates, Charles	0.70	\$ 595.00	GM work on model approaches
4/5/2010	Bates, Charles	1.00	\$ 850.00	work on estimation methodology
4/8/2010	Bates, Charles	0.40	\$ 340.00	GM: Finalize and sign declaration
4/8/2010	Bates, Charles	0.30	\$ 255.00	review declaration
4/19/2010	Bates, Charles	0.70	\$ 595.00	Motors Liq: work on general model prototype
4/19/2010	Bates, Charles	1.50	\$ 1,275.00	Mortor Liq: work on general model prototype
4/19/2010	Bates, Charles	0.90	\$ 765.00	continued work on general model prototype
4/20/2010	Bates, Charles	0.50	\$ 425.00	Motors Liq: work on estimation methodology
4/21/2010	Bates, Charles	1.20	\$ 1,020.00	Motors Liq: work on estimation model
4/21/2010	Bates, Charles	0.50	\$ 425.00	Motors Liq: work on estimation model
4/21/2010	Bates, Charles	0.60	\$ 510.00	Motors Liq: work on estimation model
4/21/2010	Bates, Charles	0.60	\$ 510.00	continued work on model development
4/21/2010	Bates, Charles	0.10	\$ 85.00	working on model development
4/21/2010	Bates, Charles	1.20	\$ 1,020.00	developing model work
4/26/2010	Bates, Charles	0.70	\$ 595.00	work on model development continued
4/26/2010	Bates, Charles	0.20	\$ 170.00	Motors Liq: Review emails from Bently re:GM-Royal engagement of 2005
4/26/2010	Bates, Charles	0.40	\$ 340.00	Motors Liq: Research GM-Royal engagement
4/26/2010	Bates, Charles	0.30	\$ 255.00	Motors Liq: Analyze GM_Royal matter for retention issues
4/26/2010	Bates, Charles	0.40	\$ 340.00	Motors Liq: Follow up on GM_Royal matter of 2005
4/26/2010	Bates, Charles	0.20	\$ 170.00	Motors Liq: Additional review of GM_Royal matter of 2005
4/27/2010	Bates, Charles	0.30	\$ 255.00	Motors Liq: Follow up on GM_Royal matter of 2005
4/27/2010	Bates, Charles	0.20	\$ 170.00	Motors Liq: Review of time records
4/27/2010	Bates, Charles	1.20	\$ 1,020.00	Motors Liq: Work on analytical building blocks for the general model
4/27/2010	Bates, Charles	1.20	\$ 1,020.00	Motors Liq: Work on model development
4/28/2010	Bates, Charles	1.00	\$ 850.00	Motors Liq: Work on model development
4/29/2010	Bates, Charles	1.30	\$ 1,105.00	work on model development
4/29/2010	Bates, Charles	0.10	\$ 85.00	Motors Liq: review time records
4/29/2010	Bates, Charles	0.70	\$ 595.00	model development work
4/29/2010	Bates, Charles	0.80	\$ 680.00	Motors Liq: Continuation of work on model development
4/29/2010	Bates, Charles	1.00	\$ 850.00	Motors Liq: research aggregate asbestos expenditures

4/30/2010	Bates, Charles	0.30	\$ 255.00	Motor Liq: Work on accounting for work histories into general model
5/3/2010	Bates, Charles	0.20	\$ 170.00	Review time records for billings
5/4/2010	Bates, Charles	0.50	\$ 425.00	Work on project staffing
5/5/2010	Bates, Charles	0.20	\$ 170.00	Continued work on project planning
5/5/2010	Bates, Charles	0.20	\$ 170.00	Continued work on project planning
5/11/2010	Bates, Charles	0.50	\$ 425.00	Work on data request
5/11/2010	Bates, Charles	1.10	\$ 935.00	Continuation of work on data request
5/11/2010	Bates, Charles	0.50	\$ 425.00	Preparation for call with Philip Bentley re data from the Debtor and upcoming meeting with him in NYC
5/11/2010	Bates, Charles	0.20	\$ 170.00	Call with Philip Bentley in which we discussed data from the Debtor and our meeting in New York in May.
5/11/2010	Bates, Charles	1.50	\$ 1,275.00	Continuation of work on data request
5/11/2010	Bates, Charles	0.70	\$ 595.00	Work on data requirements
5/12/2010	Bates, Charles	0.80	\$ 680.00	Begin GM data review
5/18/2010	Bates, Charles	0.40	\$ 340.00	Initial review of Debtor's claims data
5/19/2010	Bates, Charles	0.50	\$ 425.00	Review of Debtor's claims data
5/19/2010	Bates, Charles	1.00	\$ 850.00	Continuation of Debtor's claims data review
5/24/2010	Bates, Charles	0.30	\$ 255.00	Work on data request
5/24/2010	Bates, Charles	0.50	\$ 425.00	Continued work on data request
5/24/2010	Bates, Charles	1.00	\$ 850.00	Work on preliminary data review
5/25/2010	Bates, Charles	0.50	\$ 425.00	Prep for client meeting
5/26/2010	Bates, Charles	1.80	\$ 1,530.00	Work on modeling presentation
5/26/2010	Bates, Charles	2.40	\$ 2,040.00	Continuation of work on modeling presentation
5/27/2010	Bates, Charles	3.00	\$ 2,550.00	Presentation to Phil Bentley
5/27/2010	Bates, Charles	0.90	\$ 765.00	Preparation for the client presentation
5/27/2010	Bates, Charles	0.90	\$ 765.00	Travel time to client meeting in New York.
5/27/2010	Bates, Charles	2.10	\$ 1,785.00	Presentation preparation
5/27/2010	Bates, Charles	1.50	\$ 1,275.00	travel time to Kramer Levin Naftalis & Frankel offices
5/27/2010	Bates, Charles	4.40	\$ 3,740.00	Travel time from New York to home
5/28/2010	Bates, Charles	0.80	\$ 680.00	Project planning

Research				
Date Incurred	Employee	Hours	Fees	Notes
3/25/2010	Coughlin, Susan	0.80	\$ 268.00	Define scope of project
3/25/2010	Coughlin, Susan	0.70	\$ 234.50	call with Philip Bentley to discuss initial research agenda
3/25/2010	Coughlin, Susan	1.20	\$ 402.00	Reviewing GM financial documents
3/26/2010	Coughlin, Susan	0.60	\$ 201.00	Outlining research goals
3/26/2010	Coughlin, Susan	1.70	\$ 569.50	Researching GM product types
3/26/2010	Coughlin, Susan	1.90	\$ 636.50	Researching GM corporate history and potential product markets
3/26/2010	Johnson, Samantha	0.30	\$ 97.50	product research briefing
3/29/2010	Coughlin, Susan	1.70	\$ 569.50	Compiled list of asbestos containing products associated with GM
3/29/2010	Coughlin, Susan	1.80	\$ 603.00	Reviewed previous asbestos litigation involving GM
3/29/2010	Coughlin, Susan	1.60	\$ 536.00	Researched GM asbestos containing products
3/29/2010	Johnson, Samantha	2.40	\$ 780.00	tracking down sources for background research - in house material
3/30/2010	Coughlin, Susan	1.40	\$ 469.00	Compiled epidemiological studies relating to brake mechanics
3/30/2010	Coughlin, Susan	3.20	\$ 1,072.00	Reviewed studies for relevance to asbestos exposure
3/30/2010	Coughlin, Susan	2.70	\$ 904.50	Searched for additional epidemiological studies related to auto mechanics
4/1/2010	Brown, Michael	0.20	\$ 90.00	provide general information about claim valuation in bankruptcy cases
4/12/2010	Coughlin, Susan	1.20	\$ 402.00	Outlining epidemiology study review goals
4/12/2010	Coughlin, Susan	1.90	\$ 636.50	Compiling list of litigations related to General Motors and auto brake products
4/12/2010	Coughlin, Susan	2.20	\$ 737.00	Researching GM products with history of asbestos use
4/12/2010	Coughlin, Susan	1.90	\$ 636.50	Summarizing findings of product research
4/13/2010	Coughlin, Susan	0.70	\$ 234.50	Review of Grenier court documents for references to relevant epidemiology studies
4/13/2010	Coughlin, Susan	1.40	\$ 469.00	Researching asbestos decomposition in normal brake use
4/13/2010	Coughlin, Susan	1.10	\$ 368.50	Review of court documents related to friction products
4/13/2010	Coughlin, Susan	1.80	\$ 603.00	identification of court cases involving friction products
4/14/2010	Coughlin, Susan	3.40	\$ 1,139.00	Review of court documents identified on SharePoint as related to auto mechanics
4/14/2010	Coughlin, Susan	2.60	\$ 871.00	Summarizing results of court case search
4/19/2010	Coughlin, Susan	1.00	\$ 335.00	Additional research on court cases alleging mechanic exposure to asbestos
4/19/2010	Coughlin, Susan	1.50	\$ 502.50	Review of studies alleging auto mechanic exposure to asbestos
4/26/2010	Coughlin, Susan	1.50	\$ 502.50	Defining progress in product research
4/26/2010	Evans, Andrew	0.20	\$ 85.00	Follow-up on GM-Royal work to prep for possible response on ACC objection
4/26/2010	Johnson, Samantha	0.50	\$ 162.50	summary of research done up to this point
4/26/2010	Johnson, Samantha	2.00	\$ 650.00	review of spreadsheet summarizing academic articles on brake mechanics and asbestos
4/27/2010	Johnson, Samantha	0.50	\$ 162.50	state tort laws for court rulings - DE
4/27/2010	Johnson, Samantha	0.30	\$ 97.50	reading draft write-up of products information
4/27/2010	Johnson, Samantha	0.70	\$ 227.50	reviewing court rulings involving brake mechanics
4/27/2010	Johnson, Samantha	0.40	\$ 130.00	review of state tort laws for court rulings - FL
4/27/2010	Johnson, Samantha	0.60	\$ 195.00	state tort laws for court rulings - TX
5/3/2010	Johnson, Samantha	1.20	\$ 390.00	state tort laws that may have impacted court rulings - FL

5/3/2010	Johnson, Samantha	1.80	\$ 585.00	state tort laws compared to rulings - NJ
5/3/2010	Morrow, Christopher	3.60	\$ 918.00	Downloading annual reports from various trusts (2009 updates)
5/4/2010	Morrow, Christopher	3.80	\$ 969.00	Updating bankruptcy trust annual report information in database (2009 Updates).
5/6/2010	Morrow, Christopher	0.50	\$ 127.50	Continued entering annual report trust data into bankruptcy database (2009 Updates).
5/6/2010	Morrow, Christopher	3.00	\$ 765.00	Quality control due-diligence on bankruptcy trust claim summary information
5/6/2010	Morrow, Christopher	1.90	\$ 484.50	Quality control due-diligence on bankruptcy trust claim summary information, continued
5/12/2010	Morrow, Christopher	2.50	\$ 637.50	Mesothelioma occurrence research, bankruptcy frequency and trust payment research.
5/28/2010	Kelso, Peter	2.50	\$ 937.50	memorandum on trust transparency efforts

**Modeling**

<b>Date Incurred</b>	<b>Employee</b>	<b>Hours</b>	<b>Fees</b>	<b>Notes</b>
4/13/2010	Grinberg, Rachel	1.00	\$ 395.00	worked on mesothelioma values modeling
4/15/2010	Grinberg, Rachel	0.80	\$ 316.00	worked on the valuation model
4/19/2010	Grinberg, Rachel	1.50	\$ 592.50	worked on meso model prototype
4/19/2010	Grinberg, Rachel	2.30	\$ 908.50	meso model prototype overview
4/20/2010	Grinberg, Rachel	2.20	\$ 869.00	Modeling methodology outline
4/20/2010	Grinberg, Rachel	1.00	\$ 395.00	Continued work on modeling methodology outline
4/21/2010	Grinberg, Rachel	1.00	\$ 395.00	Modeling methodology overview
4/21/2010	Grinberg, Rachel	2.50	\$ 987.50	worked on modeling methodology
4/21/2010	Grinberg, Rachel	0.50	\$ 197.50	reviewed modeling methodology concerning next steps
4/21/2010	Grinberg, Rachel	1.50	\$ 592.50	worked on modeling methodology continued
4/21/2010	Grinberg, Rachel	0.50	\$ 197.50	Worked on modeling methodology
4/23/2010	Grinberg, Rachel	0.50	\$ 197.50	worked on steps in modeling approach
4/23/2010	Grinberg, Rachel	0.50	\$ 197.50	reviewed steps in modeling approach
4/23/2010	Grinberg, Rachel	2.00	\$ 790.00	worked on the modeling methodology
4/23/2010	Grinberg, Rachel	2.00	\$ 790.00	continued work on modeling methodology
4/26/2010	Grinberg, Rachel	1.00	\$ 395.00	worked on the forecasting methodology
4/26/2010	Grinberg, Rachel	1.20	\$ 474.00	worked on the forecasting methodology
4/26/2010	Grinberg, Rachel	2.10	\$ 829.50	continued work on the forecasting methodology
4/27/2010	Grinberg, Rachel	3.00	\$ 1,185.00	worked on the forecasting methodology and motivation for general model
4/27/2010	Grinberg, Rachel	2.20	\$ 869.00	worked on analytical building blocks for the general model
4/28/2010	Grinberg, Rachel	1.10	\$ 434.50	reviewed estimation steps
4/28/2010	Grinberg, Rachel	1.90	\$ 750.50	worked on analytical building blocks for the general model
4/28/2010	Grinberg, Rachel	0.50	\$ 197.50	forecasting methodology overview
4/29/2010	Grinberg, Rachel	2.00	\$ 790.00	continued work on the outline of the analytical building blocks got the general model
4/29/2010	Grinberg, Rachel	1.70	\$ 671.50	worked on the analytical building blocks for the general model
5/3/2010	Grinberg, Rachel	1.20	\$ 474.00	overview of data needed for the model estimation
5/3/2010	Grinberg, Rachel	0.80	\$ 316.00	worked on updates to the simulation model prototype
5/4/2010	Grinberg, Rachel	1.10	\$ 434.50	worked on updates to the general model framework

**Project Management**

<b>Date Incurred</b>	<b>Employee</b>	<b>Hours</b>	<b>Fees</b>	<b>Notes</b>
3/24/2010	Grinberg, Rachel	0.70	\$ 276.50	worked on the declaration and the retention letter
3/24/2010	Grinberg, Rachel	0.70	\$ 276.50	retention letter declaration draft
3/25/2010	Grinberg, Rachel	0.60	\$ 237.00	worked on the declaration
3/25/2010	Grinberg, Rachel	0.40	\$ 158.00	revised the declaration
3/25/2010	Grinberg, Rachel	0.60	\$ 237.00	worked on the declaration and the retention letter
4/8/2010	Grinberg, Rachel	0.20	\$ 79.00	work on the declaration continued
4/8/2010	Grinberg, Rachel	0.40	\$ 158.00	worked on the declaration
4/16/2010	Grinberg, Rachel	0.50	\$ 197.50	review of time keeping to comply with bankruptcy court orders
4/19/2010	Grinberg, Rachel	0.30	\$ 118.50	worked on work streams for the upcoming week
4/26/2010	Grinberg, Rachel	0.50	\$ 197.50	reviewed team's time entries and protocols
4/30/2010	Grinberg, Rachel	0.10	\$ 39.50	call with Jennifer Sharret re time keeping guide lines
4/30/2010	Grinberg, Rachel	0.20	\$ 79.00	overview of the time keeping guide lines
4/30/2010	Grinberg, Rachel	0.30	\$ 118.50	drafted email to communicate time keeping guide lines to the team
5/3/2010	Grinberg, Rachel	0.60	\$ 237.00	review of invoices
5/6/2010	Johnson, Samantha	0.90	\$ 292.50	reviewing time records for April to ensure compliance with bankruptcy protocol
5/10/2010	Johnson, Samantha	0.60	\$ 195.00	review of time for team from last week to ensure compliance with bankruptcy protocol
5/11/2010	Johnson, Samantha	1.30	\$ 422.50	review of Motors time for protocol compliance - April
5/17/2010	Johnson, Samantha	0.80	\$ 260.00	review of last week's time records to ensure team is complying with bankruptcy standards
5/24/2010	Johnson, Samantha	0.70	\$ 227.50	review of time records for team to ensure compliance with bankruptcy standards