

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

In re:

MOTORS LIQUIDATION COMPANY,
et al.,
f/k/a General Motors Corp., *et al.*,

Debtor.

Chapter 11

Case No. 09- 50026 (REG)

Hearing Date: TBD
Objection Deadline: TBD

**SECOND INTERIM QUARTERLY APPLICATION OF LEGAL ANALYSIS
SYSTEMS, INC. FOR INTERIM COMPENSATION AND REIMBURSEMENT OF
EXPENSES WITH RESPECT TO SERVICES RENDERED AS CONSULTANT ON THE
VALUATION OF ASBESTOS LIABILITIES TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS HOLDINGS ASBESTOS-RELATED CLAIMS FOR THE
PERIOD JUNE 1, 2010 THROUGH SEPTEMBER 30, 2010**

Name of Applicant:

LEGAL ANALYSIS SYSTEMS, INC.

Authorized to Provide Professional Services to:

The Official Committee of
Unsecured Creditors Holding
Asbestos-Related Claims of Motors
Liquidation Company, *et al.*

Date of Retention:

April 6, 2010 *nunc pro tunc*
to March 15, 2010

Period for which
Compensation and
Reimbursement are sought:

June 1, 2010 through
September 30, 2010

Amount of Compensation
sought as actual, reasonable
And necessary

\$166,956.50

Amount of Expense
Reimbursement sought as
actual, reasonable
and necessary

\$2,510.26

This is an:

interim quarterly

final application.

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PERIOD JUNE 1, 2010 THROUGH SEPTEMBER 30, 2010**

Pursuant to 11 U.S.C. §§ 330 and 331, Rule 2016 of the Federal Rules of Bankruptcy Procedure, and the Administrative Order, Pursuant to Sections 105(a) and 331 of the Bankruptcy Code, Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals (the “Administrative Order”), the consulting firm of LEGAL ANALYSIS SYSTEMS, INC. (“Legal Analysis Systems”) hereby submits this second interim application (“Second Interim Application”) for an Order awarding it interim compensation for professional consulting services rendered as consultant on the valuation of asbestos liabilities to the Official Committee of Unsecured Creditors Holding Asbestos-Related Claims (the “Asbestos Claimants Committee”) of the debtor, Motors Liquidation Company, *et al.*, (“Debtor”), in an amount of \$ 166,956.50, together with reimbursement of Legal Analysis System’s actual and necessary expenses incurred in the amount of \$ 2,510.26, for the period commencing June 1, 2010 through

September 30, 2010 (the "**Application Period**"). In support of this Second Interim Application, Legal Analysis Systems, Inc., respectfully represents as follows:

I. JURISDICTION

1. This Court has subject matter jurisdiction pursuant to 11 U.S.C. §331.

II. BACKGROUND

2. On June 1, 2010 (the "**Petition Date**"), the Debtor filed a voluntary petition for relief under Chapter 11 under Title 11 of the United States Code (the "**Bankruptcy Code**").

3. From the Petition Date through the date of this Second Interim Application, the Debtor has continued to operate its businesses and manage its properties as debtor-in-possession, pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

4. On March 2, 2010, the Office of the United States Trustee appointed the Asbestos Claimants Committee pursuant to section 1102 of the Bankruptcy Code. The Asbestos Claimants Committee is comprised entirely of persons who hold pending claims against the Debtor for asbestos-related personal injury or wrongful death.

5. On March 18, 2010, the Asbestos Claimants Committee filed and served its Application For Entry Of An Order Nunc Pro Tunc To March 15, 2010 authorizing the employment of Legal Analysis Systems as consultant on the valuation of asbestos liabilities to the Official Committee Of Unsecured Creditors Holding Asbestos-Related Claims. On April 6, 2010, the Court entered an order, approving the retention application.

III. RELIEF REQUESTED

6. By this Second Interim Application, Legal Analysis Systems seek allowance and payment of \$ 166,956.50 in fees for services rendered during the Application Period and reimbursement of \$ 2,510.26 for reasonable and necessary expenses incurred during the

Application Period. Thus, Legal Analysis Systems seeks allowance and payment in the total amount of \$ 169,466.76.

7. Legal Analysis Systems has received \$19,594.00 in fees for services rendered and no promises for payment from any source for services rendered during the Application Period in connection with the case. There exists no agreement or understanding between Legal Analysis Systems and any other person for the sharing of any compensation to be received for services rendered by Legal Analysis Systems in the case.

8. All services for which compensation is requested by Legal Analysis Systems pursuant to this Application were performed for or on behalf of the Asbestos Claimants Committee in this case.

9. This is Legal Analysis System's Second Interim Application.

IV. NARRATIVE DESCRIPTION OF SERVICES

Review, work on plan documents/rulings:

(a) We reviewed rulings and pleadings on obtaining data from trusts, reviewed issues related to anonymity protocol.

Confer with Committee, Professionals:

(b) We conferred with attorneys representing the claimants' committee on the availability and quality of data sent by MLC and data privacy issues.

Analyses of Claims Database:

(c) We received, cleaned, and organized the claims data upon which our analysis relies. We gained familiarity with the problems in these data so as to adapt our analytical methods to what was available.

Estimate Debtor's Liability:

(d) We developed liability estimation methods tailored to the MLC data, and obtained preliminary estimates of MLC's liability.

Research on Claims and Settlements:

(e) We sought data from law firms on their settlements to better understand the MLC data and its sometimes anomalous values.

Research Obtain Other Data:

(f) We obtained data from Mealeys Litigation Reporter to understand trends in asbestos verdicts and how they might impact MLC settlement values.

Other Experts, Evaluate, Confer:

(h) We reviewed reports by HR&A, professionals who had earlier estimated GM's asbestos liability. We had preliminary discussions with HR&A professionals about their use of the GM data.

Analysis of other Matters:

(k) We designed methods for budgeting and billing that would be compatible with the activities we would be undertaking during the course of our engagement.

V. SUMMARY OF SERVICES RENDERED

10. The professionals at Legal Analysis Systems who have provided services to or for the Asbestos Claimants Committee in this case and their standard hourly rates during the Application Period were as follows:

<u>Name</u>	<u>Position</u>	<u>Years Experience</u>	<u>Rate</u>
Peterson	Attorney/ Social	38	\$800

<u>Name</u>	<u>Position</u>	<u>Years Experience</u>	<u>Rate</u>
	Psychologist		
Relles	Statistician	42	\$475
Ebener	Social Science Researcher	33	\$335

11. Legal Analysis Systems has maintained detailed records of the time spent in the rendition of professional services for the Asbestos Claimants Committee during the Application Period. Attached hereto as Exhibit A and incorporated herein by reference is a true and correct copy of the billing statement prepared for the services rendered in this case by Legal Analysis Systems (the "**Billing Statement**"). The Billing Statement is in the same form regularly used by Legal Analysis Systems to bill its clients for services rendered and includes the date that the services were rendered, a detailed, contemporaneous narrative description of the services, the amount of time spent for each service and the designation of the professional who performed the service. In addition, attached hereto as Exhibit B and incorporated herein by reference is a summary by category of the professional services provided during the Application Period.

12. As set forth on Exhibits A and B, Legal Analysis Systems rendered 269.60 hours of professional services during the Application Period, resulting in legal fees totaling \$ 166,956.50 and associated reasonable and necessary expenses totaling \$ 2,510.26.

13. The total value of the services rendered by Legal Analysis Systems as shown on Exhibit B, broken down among the persons rendering the services is as follows*:

* Nonworking travel time is billed at one-half the professional's usual hourly rate. See Exhibit A, for breakdown.

<u>Name</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Value</u>
Peterson	126.10	\$800	\$100,880.00
Relles	128.60	\$475	\$ 61,085.00
Ebener	14.90	\$335	\$ 4,991.50
Total	269.60		\$166,956.50

14. Set forth below are the rates for the expenses incurred by Legal Analysis Systems for which reimbursement is requested pursuant to this Application, as well as the basis for such rates for the identified expense items:

a) The expenses during this Application Period were for Verdict Report Coding charges.

15. Attached hereto as Exhibit C and incorporated herein by reference is a summary by category of the expenses incurred by Legal Analysis Systems for which reimbursement is requested. Furthermore, incorporated herein are copies of all the receipts for the Application Period of our expenses incurred by Legal Analysis Systems for which reimbursement is requested. This information also appears on Exhibit A hereto. Further supporting documentation is available upon request.

16. Legal Analysis Systems provides expert services regarding investigation, analysis and valuation of personal injury claims in bankruptcy and litigation related matters. The services that Legal Analysis Systems has performed and will continue to perform for the Asbestos Claimants Committee include, but are not limited to, the following:

- a) Review analysis, development and/ or oversight of proposed Disclosure Statement., Plan, and other similar documents in this reorganization proceeding; review relevant submissions to and rulings by the Court;
- b) Meetings, conferences, telephone, email with committee members, counsel or other professionals;
- c) Review and analysis of the Debtor's asbestos claims database and review and analysis of the Debtor's resolution of various Asbestos Claims, review and analysis of other relevant data;
- d) Estimation of the Debtor's liability for Asbestos Claims that are pending at the present time as well as those that will be filed in the future;
- e) Review documents and conduct other research on claims filings or settlements, issue of asbestos exposures, presence of asbestos containing materials and other facts that explain or contribute to understanding claims data and results of analysis of that data;
- f) Identify, develop or obtain other relevant data;
- g) Develop, review and quantitative analyses of claims resolution procedures including estimation of payments that would be made to various types of claims under those alternatives and development of cash flow analyses of an asbestos compensation trust under alternative procedures;
- h) Evaluation of reports and opinions of experts and consultants retained by other parties to these bankruptcy proceedings;
- i) Meet with other parties and other parties' experts or professionals;
- j) Evaluations and analyses of proposed proofs of claims and bar dates and analyses of data from proofs of claim for asbestos claims;

k) Quantitative analyses of other matters related to the Asbestos Claims as may be requested by the ACC;

l) Testimony on such matters as is required by the ACC and preparation;

m) Prepare reports on analyses, liability forecasts, trust procedures or other matters requested by counsel;

n) Non-working travel (billed at half rate);

o) Prepare fee applications.

17. The generality of the foregoing description is amplified on a day-to-day basis by the Billing Statement attached as Exhibit A.

18. Thus, through this Second Interim Application, Legal Analysis Systems seeks interim allowance and payment of \$166,956.50 in fees and \$ 2,510.26 in expenses. A Notice of Second Interim Application will be filed and served on all parties requesting notice under Bankruptcy Rule 2002.

19. A cumulative summary of Legal Analysis Systems for services rendered and reimbursement of expenses as consultant on the valuation of asbestos liabilities for the Asbestos Claimants Committee is attached as Exhibit D for the period June 1, 2010 through September 30, 2010.

V. ALLOWANCE OF COMPENSATION

20. Legal Analysis Systems has endeavored to represent the Asbestos Claimants Committee in the most expeditious and economical manner possible.

WHEREFORE, Legal Analysis Systems, respectfully requests that the Court enter an Order approving this Application and directing payment of \$ 166,956.50 in fees and reimbursement of \$ 2,510.26 in expenses, and for such other and further relief as the Court deems just and proper.

LEGAL ANALYSIS SYSTEMS, INC.

Mark A. Peterson (A.P.)

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*Valuation Consultant to the Official Committee
Of Unsecured Creditors Holding Asbestos-
Related Claims of Motors Liquidation Company*

Dated: November 15, 2010

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

In re:

MOTORS LIQUIDATION COMPANY,
et al.,
f/k/a General Motors Corp., *et al.*,

Debtor.

Chapter 11

Case No. 09- 50026 (REG)

**ORDER AWARDING COMPENSATION
AND REIMBURSEMENT OF EXPENSES**

The Court considered the Second Interim Quarterly Application of LEGAL ANALYSIS SYSTEMS, INC. ("Legal Analysis Systems"), For Interim Compensation And Reimbursement Of Expenses As Consultant On The Valuation Of Asbestos Liabilities To The Official Committee of Unsecured Creditors Holding Asbestos-Related Claims of Motors Liquidation Company (the "Application"), which Application requests allowance and payment of compensation and reimbursement of expenses in accordance with §330 and §331 of the Bankruptcy Code, and it appearing that notice of the Application was duly given in accordance with the provisions of the Bankruptcy Rules, and no further notice being necessary, and upon the record being made before this Court, and after due deliberation, and sufficient cause appearing therefore, it is hereby;

ORDERED that the Application is granted;

FURTHER ORDERED that the Debtor is directed to pay immediately any remaining unpaid fees and expenses requested in the Application.

Dated: _____, 2010

Honorable Robert E. Gerber
United States Bankruptcy Court Judge

LEGAL ANALYSIS SYSTEMS

EXHIBIT A

Review, work on plan documents/rulings (10.30 Hours; \$6,550.00)

<u>Professionals</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson	5.10	\$800	4,080.00
Relles	5.20	\$475	2,470.00

<u>Trans</u>	<u>Empl</u>	<u>Bill</u>	<u>Billing</u>	<u>Full Narrative</u>
<u>Date</u>	<u>Name</u>	<u>Rate</u>	<u>Hours</u>	
09/01/10	Peterson	800.00	0.70	Review Unsecured Creditors motion re: trust data and estimation
09/01/10	Peterson	800.00	0.60	Review confidentiality provisions
09/09/10	Relles	475.00	1.50	Send emails to data privacy experts
09/10/10	Peterson	800.00	0.50	Telephone Relles and Wehner re: Bates data request
09/10/10	Peterson	800.00	1.00	Telephone Relles and Sweeney re: privacy protection
09/10/10	Peterson	800.00	0.30	Review data confidentiality proposal
09/10/10	Relles	475.00	0.50	Telephone Peterson and Wehner re: Bates data request
09/10/10	Relles	475.00	1.00	Telephone Peterson and Sweeney re: privacy protection
09/16/10	Relles	475.00	0.50	Email Sweeney re: data privacy consulting
09/27/10	Peterson	800.00	1.50	Address data anonymity issues
09/27/10	Peterson	800.00	0.50	Telephone Relles re: anonymity issues
09/27/10	Relles	475.00	0.50	Telephone Peterson re: anonymity issue
09/27/10	Relles	475.00	1.20	Read anonymity proposal

Total Task Code (a) 10.30**Confer with Committee, Professionals (27.90 Hours; \$ 18,712.50)**

<u>Professionals</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson	16.80	\$800	13,440.00
Relles	11.10	\$475	5,272.50

<u>Trans Date</u>	<u>Empl Name</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
06/23/10	Peterson	800.00	0.60	Telephone Relles re: discuss claims data, analyses and conference call on those issues.
06/23/10	Peterson	800.00	0.40	Telephone Swett re: discuss claims data and preliminary analyses.
06/23/10	Relles	475.00	0.60	Telephone Peterson re: discuss claims data, analyses and conference call on those issues.
06/24/10	Peterson	800.00	1.00	Conference call with Swett, Esseman, ARPC, and Relles re: discuss possible sources of additional claims data and possible acquisition of such data.
06/24/10	Relles	475.00	1.00	Conference call with Swett, Esseman, ARPC and Peterson re: discuss data needs.
06/25/10	Peterson	800.00	0.30	Telephone Relles re: plan upcoming conference call with Swett and materials for call.
06/25/10	Peterson	800.00	0.50	Review materials prepared for conference call with Swett.
06/25/10	Peterson	800.00	1.20	Conference call with Swett and Relles re: discuss data, analyses of data, and preliminary results.
06/25/10	Relles	475.00	2.80	Prepare inputs for phone call with Swett and Peterson.
06/25/10	Relles	475.00	0.30	Telephone Peterson re: plan upcoming conference call with Swett and materials for call.

06/25/10	Relles	475.00	1.20	Conference call with Swett and Peterson re: data and preliminary results.
07/01/10	Peterson	800.00	0.50	Preparation for conference call with Swett and FCR attorneys.
07/01/10	Peterson	800.00	0.50	Conference call with Swett and FCR attorneys and experts re data issues.
07/03/10	Peterson	800.00	1.00	Review FCR request for production about claims data.
07/26/10	Relles	475.00	0.30	Email Swett re: new files on MLC website.
08/02/10	Peterson	800.00	0.80	Conference call with Swett and Relles
08/02/10	Peterson	800.00	1.00	Review and respond to Swett memo on data issues
08/02/10	Relles	475.00	0.80	Conference call with Swett, Inselbuch, and Peterson re: identifying data requirements
08/03/10	Relles	475.00	0.50	Review Swett memo
08/11/10	Peterson	800.00	1.50	Review order re: Trust discover and UCC motion on the matter
08/18/10	Peterson	800.00	0.50	Telephone Swett re: Integrated Confidentiality Statement
08/19/10	Peterson	800.00	0.60	Review email (.2) and telephone Swett (.4) about use and confidentiality of Social Security numbers in claims databases
08/30/10	Peterson	800.00	0.40	Telephone Cooney re: MLC data
08/30/10	Peterson	800.00	2.80	Review, assemble and sent information requested by Cooney
09/06/10	Peterson	800.00	0.20	Send tables of claims data to Swett
09/09/10	Peterson	800.00	0.50	Telephone Wehner and Relles re: discuss data privacy issues

09/09/10	Relles	475.00	0.50	Telephone Wehner and Peterson re: discuss data privacy issues
09/15/10	Peterson	800.00	1.00	Conference call with Committee about completeness of MLC data
09/15/10	Peterson	800.00	0.50	Telephone Relles re: discuss committee meeting in Chicago
09/15/10	Relles	475.00	0.50	Telephone Peterson re: discuss committee meeting in Chicago
09/16/10	Relles	475.00	1.40	Review and process cd-rom sent by Wehner
09/19/10	Relles	475.00	1.00	Work on memo to Inselbuch re: discrepancies between MLC and law firm data
09/20/10	Peterson	800.00	1.00	Telephone Inselbuch re: forecasts and completeness of MLC data and preparation for call
09/27/10	Relles	475.00	0.20	Telephone Swett re: data anonymity proposal

Total Task Code .A 27.90

Analyses of Claims Database (104.80 Hours; \$ 68,955.00)

<u>Professionals</u>		<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson		59.00	\$800	47,200.00
Relles		45.80	\$475	21,755.00
<u>Trans Date</u>	<u>Empl Name</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
06/08/10	Peterson	800.00	0.30	Telephone Relles re: discuss MLC claims data and data from proofs of claim in bankruptcy.
06/08/10	Peterson	800.00	1.30	Review claims data and bar date data and explanations of claims data.

06/08/10	Relles	475.00	3.20	Integrate pre-bankruptcy data with bar date data..
06/08/10	Relles	475.00	0.30	Telephone Peterson re: discuss data and simple summaries of the data.
06/14/10	Relles	475.00	2.20	Work on building analytical database.
06/24/10	Peterson	800.00	0.10	Telephone Relles re: discuss Bar date documentation; poof of claim forms, instructions, etc.
06/24/10	Peterson	800.00	1.70	Review Relles' archives of all currently available material on MLC liability and data.
06/24/10	Peterson	800.00	0.80	Review bar data order, proof of claim form and instructions for form in order to understand POC data and potential uses.
06/24/10	Relles	475.00	0.10	Telephone Peterson re discuss Bar date documentation; proof of claim forms, instructions, etc.
07/02/10	Peterson	800.00	2.60	Review claims data regarding nature of claims.
07/05/10	Relles	475.00	1.00	Review latest Alix data on defense costs and bankruptcy claims.
07/14/10	Peterson	800.00	2.00	Review claims value data and trends.
07/14/10	Relles	475.00	1.60	Update information on claims value trends.
07/26/10	Relles	475.00	0.80	Identify and examine new files from Alix.
08/01/10	Peterson	800.00	0.70	Telephone Relles re: differences in payment rates and payment values between early and recent GM settlements
08/01/10	Peterson	800.00	3.80	Analysis of settlement values by law firm and state and years of settlement
08/01/10	Relles	475.00	4.90	Investigate differences in payment rates and payment values between early and recent GM settlements

08/01/10	Relles	475.00	0.70	Telephone Peterson re: differences in payment rates and payment values between early and recent GM settlements
08/02/10	Peterson	800.00	2.20	Review GM settlement history with particular law firms
08/03/10	Peterson	800.00	1.00	Review GM settlement history with particular law firms
08/04/10	Peterson	800.00	2.00	Interview Thiel about law firm's settlement history with GM, review claims data for call
08/04/10	Relles	475.00	0.40	Telephone Matthew Thiel (Kazan law firm) re: discuss Kazan firm settlements
08/05/10	Relles	475.00	3.70	Rebuild analytical files, eliminating duplicates, developing law firm identifiers, and adding exposure indices
08/05/10	Relles	475.00	5.00	Analyze factors affecting payment amounts
08/12/10	Peterson	800.00	3.20	Review subsidiaries and explore potential asbestos liabilities
08/12/10	Peterson	800.00	2.50	Analyses of variables potentially related to settlement values
08/12/10	Peterson	800.00	0.50	Telephone Relles re: analyses of variations in settlement values
08/12/10	Relles	475.00	3.70	Estimate effects for trial listed claims
08/12/10	Relles	475.00	0.50	Telephone Peterson re: analyses of variations in settlement values
08/13/10	Peterson	800.00	1.50	Review SF-DCT claims processing report for July 2010
08/13/10	Peterson	800.00	1.20	Telephone Relles re: factors affecting settlement values
08/13/10	Peterson	800.00	2.00	Review MLC settlement data

08/13/10	Peterson	800.00	3.40	Review and search for information on GM subsidiaries
08/13/10	Relles	475.00	1.20	Telephone Peterson re: factors affecting settlement values
08/18/10	Peterson	800.00	1.00	Review draft of Integrated Confidentiality Statement
08/20/10	Peterson	800.00	2.70	Investigate businesses and possible involvement of subsidiaries with asbestos
08/22/10	Relles	475.00	4.80	Extract and organize 28 Access databases from cd-rom
08/22/10	Relles	475.00	1.70	Review contents of databases
08/23/10	Peterson	800.00	6.70	Review interrogatories
08/23/10	Relles	475.00	0.90	Download and organize latest data from Alix
08/23/10	Relles	475.00	1.60	Download and organize interrogatories
08/23/10	Relles	475.00	2.40	Review interrogatories
08/24/10	Peterson	800.00	3.70	Review interrogatories
08/25/10	Peterson	800.00	1.50	Review order regarding trust's data
08/26/10	Peterson	800.00	0.40	Review emails re: data on subsidiaries
08/27/10	Relles	475.00	3.40	Organize tiff files and review and summarize contents of same
08/30/10	Peterson	800.00	3.80	Investigate settlement amounts and trends
09/09/10	Peterson	800.00	1.00	Review summary statistics on GM's past asbestos litigation
09/10/10	Peterson	800.0	1.10	Review alternative forecasts on GM's past asbestos litigation
09/15/10	Peterson	800.00	1.00	Review summary statistics
09/15/10	Relles	475.00	1.70	Process recently received data for

information on pre-petition pending claims

09/18/10	Peterson	800.00	1.20	Review analyses of completeness of data
09/19/10	Peterson	800.00	1.60	Review analyses of completeness of data
09/24/10	Peterson	800.00	0.50	Review FCR questions, GM answers on data

Total Task Code .B 104.80

Estimate Debtor's Liability (20.40 Hours; \$ 11,672.50)

<u>Professionals</u>		<u>Number of Hours</u>		<u>Billing Rate</u>	<u>Value</u>
Peterson		6.10		\$800	4,880.00
Relles		14.30		\$475	6,792.50

<u>Trans Date</u>	<u>Empl Name</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
06/17/10	Peterson	800.00	0.50	Telephone Relles re: discuss claims and liability forecasts.
06/17/10	Peterson	800.00	2.00	Review summary of key forecasting parameters and preliminary forecasts.
06/17/10	Relles	475.00	2.50	Develop claims and liability forecasts.
06/17/10	Relles	475.00	0.50	Telephone Peterson re: discuss results of claims and liability forecasts.
06/23/10	Relles	475.00	1.00	Organize materials for Peterson phone call re: discuss liability estimation.
06/24/10	Peterson	800.00	1.20	Telephone Relles re: discuss extent, uses and limitations of data on past claims and resolutions for estimating liabilities.
06/24/10	Relles	475.00	0.50	Review all data, analyses and files to date in preparation for call about liability analyses.

06/24/10	Relles	475.00	1.20	Telephone Peterson re: discuss analysis of liabilities and problems with data.
06/24/10	Relles	475.00	1.20	Update analysis of liabilities.
7/31/10	Relles	475.00	3.40	Run additional variations of MLC projections.
09/13/10	Relles	475.00	0.60	Telephone Peterson re: discuss liability estimates
09/09/10	Peterson	800.00	0.50	Telephone Relles re: discuss liability projection methods
09/09/10	Relles	475.00	0.50	Telephone Peterson re: discuss liability projection methods
09/10/10	Peterson	800.00	1.30	Telephone Relles re: review projections
09/10/10	Relles	475.00	1.60	Update liability projections
09/10/10	Relles	475.00	1.30	Telephone Peterson re: review projections
09/13/10	Peterson	800.00	0.60	Telephone Relles re: discuss liability estimates

Total Task Code .C 20.40

Research on Claims and Settlements (57.60 Hours; \$34,055.00)

<u>Professionals</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson	20.60	\$800	16,480.00
Relles	37.00	\$475	17,575.00

<u>Trans Date</u>	<u>Empl Name</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
09/08/10	Peterson	800.00	0.30	Telephone Relles re: assembling additional information for attorney surveys
09/08/10	Peterson	800.00	1.10	Review data on settlements by law firms

09/08/10	Peterson	800.00	1.00	Telephone Angelides re: settlements with GM
09/08/10	Peterson	800.0	0.30	Email to Steve Baron regarding prepetition GM settlements
09/08/10	Relles	475.00	1.80	Prepare files for attorney surveys
09/08/10	Relles	475.00	0.30	Telephone Peterson re: assembling additional information for attorney surveys
09/09/10	Peterson	800.00	0.50	Telephone Relles re: discuss settlement strategies
09/09/10	Peterson	800.00	0.60	Review and organize notes from Simmons calls; review settlement history
09/09/10	Relles	475.00	0.50	Telephone Peterson re: discuss settlement strategies
09/16/10	Peterson	800.00	2.50	Telephone law firms about data on settlements
09/17/10	Peterson	800.00	1.10	Compare Simmons and MLC data on settled claims
09/17/10	Relles	475.00	5.50	Link claims data to information from law firms to identify discrepancies in MLC settlement data
09/18/10	Peterson	800.00	0.70	Telephone Relles re: discuss discrepancies between MLC and law firm settlement data
09/18/10	Relles	475.00	5.70	Work on identifying and summarizing discrepancies between MLC and law firm settlement data
09/18/10	Relles	475.00	0.70	Telephone Peterson re: discuss discrepancies between MLC and law firm settlement data
09/19/10	Peterson	800.00	0.80	Telephone Relles re: completeness of MLC settlement data (several calls)
09/19/10	Peterson	800.00	2.50	Draft memo on completeness of MLC settlement data
09/19/10	Relles	475.00	4.70	Work on identifying and summarizing

discrepancies between MLC and law firm settlement data

09/19/10	Relles	475.00	1.70	Update MLC database with information from law firms
09/19/10	Relles	475.00	0.80	Telephone Peterson re: completeness of MLC settlement data (several calls)
09/20/10	Peterson	800.00	0.30	Telephone Relles re: discuss getting data from law firms
09/20/10	Peterson	800.00	0.30	Review Kazan firm settlements
09/20/10	Peterson	800.00	1.30	Emails to law firms about lists of settlements
09/20/10	Relles	475.00	0.30	Telephone Peterson re: discuss getting data from law firms
09/20/10	Relles	475.00	0.40	Email Pacheco (Wilentz firm) re: correspondence between law firm and MLC settlement data
09/20/10	Relles	475.00	0.30	Email correspondence with Pacheco
09/20/10	Relles	475.00	0.30	Discuss getting data from law firms
09/21/10	Peterson	800.00	0.20	Emails re: completeness of settlement data
09/21/10	Peterson	800.00	1.00	Review additional data on GM settlements, compare to MLC settlement data
09/21/10	Relles	475.00	2.60	Compare settlements submitted by law firms to MLC settlement data
09/25/10	Relles	475.00	1.70	Determine overlap between MLC settlement data and a specific law firm
09/29/10	Peterson	800.00	1.20	Review new data on settlements
09/29/10	Relles	475.00	2.60	Organize law firm data
09/30/10	Peterson	800.00	0.40	Telephone Relles re: results of law firm / MLC file merge

09/30/10	Peterson	800.00	1.50	Emails with law firms about settlement data
09/30/10	Peterson	800.00	3.00	Review new data on settlements
09/30/10	Relles	475.00	3.90	Reconcile law firm / MLC file differences, update payment estimates based on law firm data
09/30/10	Relles	475.00	2.80	Summarize differences for discussion with Caplin-Drysdale
09/30/10	Relles	475.00	0.40	Telephone Peterson re: results of law firm / MLC file merge

Total Task Code (e) 57.60

Research Obtain Other Data (27.80 Hours; \$ 13,719.00)

<u>Professionals</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson	8.00	\$800	6,400.00
Relles	4.90	\$475	2,327.50
Ebener	14.90	\$335	4,991.50

<u>Trans Date</u>	<u>Empl Name</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
06/01/10	Ebener	335.00	0.20	Review coder question on jury verdict report.
06/02/10	Ebener	335.00	0.10	Reply to coder question on jury verdict report.
06/07/10	Ebener	335.00	0.20	Check with Dahl Inc. on status of data capture.
06/08/10	Ebener	335.00	0.40	Provide specifications to Dahl Inc for date capture of additional injured persons form.
06/09/10	Ebener	335.00	0.40	Preliminary review of the primary data entry file.
06/10/10	Ebener	335.00	0.30	Check coder hours for accuracy.
06/10/10	Ebener	335.00	0.40	Review scan of sampled cases.

06/10/10	Ebener	335.00	0.10	Check on status of data entry file.
06/10/10	Ebener	335.00	0.10	Provide FedEx instructions.
06/10/10	Ebener	335.00	0.50	Create additional injured parties file layout.
06/11/10	Ebener	335.00	0.10	Email Dahl Inc. with receipt confirmation for data file.
06/14/10	Ebener	335.00	0.50	Check data entry file transmittal for accuracy.
06/14/10	Ebener	335.00	0.10	Email Dahl Inc. to schedule residual data capture.
06/15/10	Ebener	335.00	0.50	Transmit completed coding forms to Dahl, Inc. for data capture.
06/16/10	Ebener	335.00	0.10	Check with Dahl Inc. on receipt of data transmittal.
06/16/10	Ebener	335.00	0.20	Email Dahl Inc. with instructions on data capture.
06/16/10	Peterson	800.00	0.30	Telephone Relles re: discuss data collection on verdicts and data on verdicts involving GMC.
06/16/10	Peterson	800.00	0.30	Review data on verdicts involving GMC.
06/16/10	Relles	475.00	1.10	Search Mealey's archives for cases involving General Motors.
06/16/10	Relles	475.00	0.30	Telephone Peterson re: discuss data collection on verdicts and data on verdicts involving GMC.
06/18/10	Ebener	335.00	1.00	Review updated to data entry file.
06/18/10	Ebener	335.00	1.00	Inventory records in data entry file.
06/18/10	Peterson	800.00	3.00	Check coding against reporter.
06/21/10	Ebener	335.00	2.00	Check coding against data entry file.
07/01/10	Peterson	80000	2.80	Review list of subsidiaries and research asbestos issues among subsidiaries.
07/14/10	Peterson	80000	1.20	Review preliminary data on verdict trends.

07/28/10	Peterson	80000	3.40	Review materials on GM asbestos litigation, including Mea leys and internet as additional sources.
09/04/10	Ebener	335.00	1.50	Audit data file in advance of delivery
09/05/10	Ebener	335.00	0.50	Transmit data files and documentation to Relles for Injured Party and Additional Injured Party cases
09/16/10	Ebener	335.00	1.00	Research response to query from Relles
09/16/10	Ebener	335.00	0.30	Prepare email response on query for Relles
09/16/10	Relles	475.00	1.40	Work on organizing jury verdict data
09/20/10	Ebener	335.00	0.20	Review set of variables from Relles for case inventory audit
09/20/10	Ebener	335.00	0.20	Confirm receipt of needed variables from Relles
09/20/10	Relles	475.00	1.70	Work on organizing jury verdict data
09/20/10	Relles	475.00	0.40	Email Ebener re: jury verdict data

Total Task Code .F 27.80

Other Experts, Evaluate, Confer (11.30 Hours; \$ 6,017.50)

<u>Professionals</u>		<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson		2.00	\$800	1,600.00
Relles		9.30	\$475	4,417.50
<u>Trans</u>	<u>Empl</u>	<u>Bill</u>	<u>Billing</u>	
<u>Date</u>	<u>Name</u>	<u>Rate</u>	<u>Hours</u>	<u>Full Narrative</u>
06/08/10	Relles	475.00	0.20	Email Sims re: discuss database and HR&A's prior usage of same.

06/11/10	Relles	475.00	0.30	Email correspondence with Sims (HR&A) and Brockman (ARPC) re: understanding database contents.
06/11/10	Relles	475.00	0.30	Telephone Sims re: understanding database contents.
06/11/10	Relles	475.00	0.20	Email correspondence with Susan Budd (ALIX) re: understanding database contents.
06/14/10	Relles	475.00	0.50	Conference call with sims and Brockman re: discuss database contents.
07/06/10	Peterson	80000	0.60	Review Florence memo re data request.
07/30/10	Peterson	80000	1.40	Review HR & A Reports.
07/30/10	Relles	475.00	2.20	Review three HR&A reports on GM Liabilities.
08/02/10	Relles	475.00	4.10	Review Rabinovitz report and attempt to replicate HR&A 's results
08/02/10	Relles	475.00	0.40	Telephone Sims re: completeness of the GM data
08/02/10	Relles	475.00	0.80	Email Sims re: proposal for a phone conversation
08/25/10	Relles	475.00	0.30	Telephone Sims re: discuss data

Total Task Code .H 11.30

Analysis of other Matters (2.50 Hours; \$ 1,675.00)

<u>Professionals</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson	1.50	\$800	1,200.00
Relles	1.00	\$475	475.00

<u>Trans Date</u>	<u>Empl Name</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
07/15/10	Peterson	80000	0.50	Telephone Relles re: Budget for August.
07/15/10	Peterson	80000	1.00	Revise budget and categories.
07/15/10	Relles	475.00	0.50	Assemble budget for August.
07/15/10	Relles	475.00	0.50	Telephone Peterson re budget for August.

Total Task Code .K 2.50

Review, work on plan Docs/Ruling (7.00 Hours; \$ 5,600.00)

<u>Professionals</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson	7.00	\$800	5,600.00

<u>Trans Date</u>	<u>Empl Name</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
07/30/10	Peterson	80000	3.80	Review UCC motion and exhibits seeking additional materials and data from trusts.
07/31/10	Peterson	80000	3.20	Review and comment on UCC motion.

Total Task Code .L 7.00

Other Charges:

Coding Services

\$ 2,510.26

LEGAL ANALYSIS SYSTEMS

EXHIBIT B

LIST OF PROFESSIONALS AND HOURS

June 1, 2010 – September 30, 2010

Name	Rate	Hours	Amount (\$)
Peterson	\$800	126.10	100,880.00
Relles	\$475	128.60	61,085.00
Ebener	\$335	14.90	4,991.50
TOTALS		269.60	\$166,956.50

