

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
www.flsb.uscourts.gov

In re:

Chapter 11

PALM BEACH FINANCE PARTNERS, L.P.,
a Delaware limited partnership, *et al.*,¹

Case No. 09-36379-BKC-PGH

Jointly Administered

Debtors.

APPLICATION FOR APPROVAL OF EMPLOYMENT OF
REED SMITH LLP AS SPECIAL COUNSEL TO THE
LIQUIDATING TRUSTEE, NUNC PRO TUNC TO NOVEMBER 1, 2010

Pursuant to this Court's Order Confirming Second Amended Joint Plan of Liquidation of Barry Mukamal, as Chapter 11 Trustee of Palm Beach Finance Partners, L.P. and Palm Beach Finance II, L.P., and Geoffrey Varga, as Joint Official Liquidator for Palm Beach Offshore, Ltd. and Palm Beach Offshore II, Ltd. (the "Confirmation Order") [ECF No. 444], the Liquidating Trust Agreements for Palm Beach Finance Partners Liquidating Trust ("PBF Liquidating Trust") and of the Palm Beach Finance II Liquidating Trust (the "PBF II Liquidating Trust") and together with the PBF Liquidating Trust, the "Liquidating Trusts"), 11 U.S.C. §327(e), Fed. R. Bankr. P. 2014 and Local Rule 2014-1, Barry Mukamal, in his capacity as Liquidating Trustee ("Liquidating Trustee") of the Liquidating Trusts, by and through undersigned counsel, files this Application (the "Application"), respectfully requesting that the Court enter an Order substantially in the form attached hereto as "**Exhibit A**," approving employment of Ann V. Kramer ("Ms. Kramer") and the law firm of Reed Smith LLP ("Reed Smith")

¹ The address and last four digits of the taxpayer identification number for each of the Debtors follows in parenthesis: (i) Palm Beach Finance Partners, L.P., 3601 PGA Blvd, Suite 301, Palm Beach Gardens, FL 33410 (TIN 9943); and (ii) Palm Beach Finance II, L.P., 3601 PGA Blvd, Suite 301, Palm Beach Gardens, FL 33410 (TIN 0680).

(collectively, the “Applicant”) as special counsel for certain insurance-related legal matters, *nunc pro tunc* to November 1, 2010, the date the services were first rendered. In support of this Application, the Liquidating Trustee submits the Affidavit of Ann V. Kramer (the “Kramer Affidavit”), a copy of which is attached hereto at **Exhibit “B.”** In further support of this Application, the Liquidating Trustee states as follows:

BACKGROUND

1. On November 30, 2009, Palm Beach Finance Partners, L.P. (“PBF I”) and Palm Beach Finance II, L.P. (“PBF II”) (collectively, the “Debtors”), through their Chief Restructuring Officer, Kenneth A. Welt, each filed a voluntary Chapter 11 bankruptcy petition in this Court. By Order dated December 1, 2009, the Court approved the joint administration of the Debtors’ cases.

2. On February 2, 2010, upon motion filed by the U.S. Trustee, the Court entered an Order approving the selection of Barry Mukamal as the Chapter 11 Trustee for both Debtors.

3. Geoffrey Varga is the Joint Official Liquidator (“JOL”) of Palm Beach Offshore, Ltd. and Palm Beach Offshore II, Ltd. (collectively, the “Offshore Funds”), which are in formal liquidation proceedings in the Cayman Islands.

4. On September 3, 2010, the JOL and the Chapter 11 Trustee, as Co-Plan Proponents, filed the Second Amended Joint Plan of Liquidation [ECF No. 245] (“Plan”),² which the Court approved by the Confirmation Order entered on the Court’s docket on October 21, 2010.

² All capitalized terms used in this Application that are not defined herein shall have the same meaning ascribed to them in the Plan.

5. The Effective Date of the Plan occurred on November 1, 2010 and on that date, the Liquidating Trusts were established pursuant to the Confirmation Order and Liquidating Trust Agreements for PBF I and PBF II signed by Barry Mukamal in his capacity as Chapter 11 Trustee and Liquidating Trustee.

6. Article 7.4(b) of the Liquidating Trust Agreements provide that the Liquidating Trustee may retain and consult with legal counsel, independent public accountants and other experts.

7. The Liquidating Trustee desires to employ the Applicant as special counsel for insurance-related legal matters pursuant to section 327(e) of the Bankruptcy Code.

8. The Applicant's fees shall be paid as follows: (i) twenty percent (20%) of any affirmative recovery up to the first \$2,300,000 received by the Liquidating Trusts from a matter or matters pursued by the Applicant; and (ii) thirty percent (30%) of any affirmative recovery thereafter received by the Liquidating Trusts from a matter or matters pursued by the Applicant.

9. Additionally, the Applicant intends to seek one-hundred (100%) reimbursement of all costs and expenses incurred in connection with these cases. The payment of expenses shall be without further order of the Court.

10. The Reed Smith attorneys and paraprofessionals who may provide services to the Liquidating Trustee, and their 2010 hourly rates for illustrative purposes, are:

Partners:	Ann V. Kramer -	\$715/hr.
	John B. Berringer -	\$620/hr.
Associates:	Jennifer Katz -	\$450/hr.
	Michael DiCanio -	\$380/hr.
Paraprofessionals:	Anne Suffern -	\$270/hr.
	Eugenia Hoyle -	\$250/hr.

This listing is not exclusive, and other professionals may perform services for the Liquidating Trustee. The Liquidating Trustee has been further advised that Reed Smith reviews and adjusts its rates annually.

RELIEF REQUESTED AND REASONS THEREFORE

11. The Liquidating Trustee desires to employ the Applicant as special counsel for insurance-related legal matters pursuant to section 327(e) of the Bankruptcy Code. Reed Smith served as the JOL's general counsel pre-confirmation and, therefore, has extensive knowledge about the history, claims and litigation implicated by these cases. The Liquidating Trustee respectfully submits that the retention of the Applicant is necessary and in the best interests of creditors, the Debtors' estates and the Liquidating Trusts and their Beneficiaries.

12. To the best of the Liquidating Trustee's knowledge, except as set forth in the Kramer Affidavit attached to this Application, the Applicant does not have any connection with the Debtors, creditors, Beneficiaries, or any other parties in interest, their respective attorneys and accountants. The Applicant does not represent any interest adverse to the Debtors, the Debtors' estates, creditors, the Liquidating Trusts and their Beneficiaries or other interest parties with respect to the matters on which the Applicant is to be engaged as required by section 327(e).

13. Moreover, because the Applicant is being retained as special counsel, the Liquidating Trustee believes the Applicant is sufficiently disinterested under section 327(e) which authorizes employment of a professional for a specified special purpose if in the best interest of the estate. Unlike the requirement that general counsel be "disinterested," as defined in 11 U.S.C. § 101(14), there is no such element requiring special counsel to be disinterested under section 327(e).

14. The Liquidating Trustee believes that the Applicant is well-suited to serve as the Liquidating Trustee's special insurance counsel in these cases. Reed Smith is an international, full service law firm with more than 1,500 lawyers in over 20 offices. Specific to this Application, Reed Smith's Insurance Recovery Group has extensive experience in representing policyholders with respect to complex insurance claims and disputes, including the following selected matters:

- a) Before the United States Bankruptcy Court, Southern District of New York, Special Counsel to the Official Committee of Unsecured Creditors of Chemtura Corporation et al. (*In re Chemtura Corporation*, No. 09-11233 (REG)) (the Chemtura Bankruptcy"), with respect to insurance matters;
- b) Before the United States Bankruptcy Court, Southern District of New York, Special Counsel to the Debtors (*In re Lehman Brothers Holdings Inc.*, No. 08-13555 (JMP)), with respect to insurance matters;
- c) The debtors' counsel before the United States Bankruptcy Court, Western District of Pennsylvania (*In re Pittsburgh Corning Corporation*, No. 00-22876) (the "PCC Bankruptcy"), including with respect to insurance matters;
- d) The debtors' counsel before the United States Bankruptcy Court, Western District of Pennsylvania (*In re North American Refractories Company*, No. 02-20198) (the "NARCO Bankruptcy"), including with respect to insurance matters;

- e) The debtors' counsel before the United States Bankruptcy Court, Western District of Pennsylvania (*In re Global Industrial Technologies Inc.*, No. 02-21626) (the "GIT Bankruptcy"), including with respect to insurance matters;
- f) The debtors' counsel before the United States Bankruptcy Court, District of Delaware (*In re W.R. Grace & Co.*, No. 01-1139) (the "Grace Bankruptcy");
- g) The creditors' committee's counsel before the United States Bankruptcy Court, Southern District of Texas (*In re ASARCO LLC*, No. 05-21207) (the "ASARCO Bankruptcy"); and
- h) Special Litigation and Insurance Coverage Counsel for Chapter 7 Trustee Howard M. Ehrenberg (*In re Axium International, Inc.*, No. 08-bk-10277-BB, Jointly Administered with *In re Diversity MSP, Inc.*, No. 08-bk-10376) before the United States Bankruptcy Court, Central District of California, Los Angeles Division,, with respect to insurance matters and claims against insiders.

15. Before joining Reed Smith on February 1, 2008, Ms. Kramer, one of the Reed Smith partners who will be primarily responsible for Reed Smith's representation of the Liquidating Trustee, was a shareholder of Anderson Kill & Olick, PC ("Anderson Kill"). Ms. Kramer has been representing policyholders in insurance recovery matters since 1988. While at Anderson Kill, she participated in the representations of the official committees of asbestos claimants as special insurance counsel in the PCC Bankruptcy, the NARCO Bankruptcy, the GIT

Bankruptcy, the Grace Bankruptcy, the ASARCO Bankruptcy and Federal Mogul Global, Inc., T&N Limited, bankruptcy proceedings, No. 01-10578 et al. (Bankr. D. Del.).

16. The Applicant is counsel to numerous entities seeking defense and indemnity insurance coverage, and has secured more than a billion dollars in insurance recoveries for its clients.³

17. The Applicant, therefore, has the experience necessary to perform the scope of the proposed and anticipated services related to insurance issues.

18. The Applicant's services shall consist of the following:

- a) Review and analysis of the Debtors' credit insurance coverage;
- b) Advice concerning, and potential prosecution of, insurance recovery claims or action(s) against credit and collateral insurers, insurance brokers or other potentially responsible parties.

19. Since the Applicant has rendered services and incurred costs on behalf of the Liquidating Trustee as the Liquidating Trustee's special counsel since the November 1, 2010 Effective Date, this Application requests that the Applicant's employment as special counsel for insurance-related legal matters be approved *nunc pro tunc* as of November 1, 2010.

20. The Liquidating Trustee proposes that the Applicant comply with, and be compensated pursuant to Paragraphs 8 and 9 of this Application and that, otherwise, the Applicant seek final approval of fees and expenses previously paid by the Liquidating Trustee in accordance with applicable provisions of the Bankruptcy Code including Sections 327 and 330, the Bankruptcy Rules, the Local Rules, the Court's Orders and procedures and the Office of the United States Trustee's guidelines.

³ Due to confidentiality restrictions, such settlements may not be identified with specificity.

WHEREFORE, the Liquidating Trustee respectfully requests that the Court enter an Order substantially in the form attached hereto as **Exhibit "A,"** approving the employment of the Applicant as special counsel to the Liquidating Trustee for insurance-related legal matters in these cases *nunc pro tunc* to November 1, 2010.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Application and all exhibits thereto were served on July 21, 2011 via the Court's Notice of Electronic Filing upon all Registered Users on the attached Exhibit 1 and via U.S. Mail upon all parties listed on the Master Service List attached as Exhibit 2.

DATED this 21st day of July, 2011.

s/ Michael S. Budwick
Michael S. Budwick, Esquire
Florida Bar No. 938777
mbudwick@melandrussin.com
MELAND RUSSIN & BUDWICK, P.A.
3000 Southeast Financial Center
200 South Biscayne Boulevard
Miami, Florida 33131
Telephone: (305) 358-6363
Telecopy: (305) 358-1221
Attorneys for Liquidating Trustee

Proposed

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
www.flsb.uscourts.gov

In re:

Chapter 11

PALM BEACH FINANCE PARTNERS, L.P.,
a Delaware limited partnership, *et al.*,¹

Case No. 09-36379-BKC-PGH

Jointly Administered

Debtors.

_____ /

**ORDER GRANTING THE APPLICATION FOR APPROVAL OF
EMPLOYMENT OF REED SMITH LLP AS SPECIAL COUNSEL TO
THE LIQUIDATING TRUSTEE, NUNC PRO TUNC TO NOVEMBER 1, 2010**

THIS MATTER came before the Court at a duly noticed hearing on _____,
2011 at _____ a.m./p.m. upon the *Application for Approval of Employment of Reed Smith*

¹ The address and last four digits of the taxpayer identification number for each of the Debtors follows in parenthesis: (i) Palm Beach Finance Partners, L.P., 3601 PGA Blvd., Suite 301, Palm Beach Gardens, FL 33410 (TIN 9943); and (ii) Palm Beach Finance II, L.P., 3601 PGA Blvd., Suite 301, Palm Beach Gardens, FL 33410 (TIN 0680).

LLP, as Special Counsel to the Liquidating Trustee, Nunc Pro Tunc to November 1, 2010 (the “Application”) filed by Barry Mukamal, as Liquidating Trustee (“Liquidating Trustee”) of the Palm Beach Finance Partners Liquidating Trust (“PBF Liquidating Trust”) and of the Palm Beach Finance II Liquidating Trust (the “PBF II Liquidating Trust” and together with the PBF Liquidating Trust, the “Liquidating Trusts”), [ECF No. ____]. The Application seeks entry of an Order, pursuant to the confirmed Plan, Liquidating Trust Agreements for Palm Beach Finance Partners, L.P. and Palm Beach Finance II, L.P. (collectively, the “Liquidating Trust Agreements”) and 11 U.S.C. §327(e), Fed. R. Bankr. P. 2014 and Local Rule 2014-1, authorizing the Liquidating Trustee to employ and retain Ann V. Kramer (“Ms. Kramer”) and the law firm of Reed Smith LLP (“Reed Smith”) (collectively, the “Applicant”) as special counsel to the Liquidating Trustee for insurance-related legal matters; and upon the Affidavit of Ann V. Kramer (the “Kramer Affidavit”), and it appearing to the Court that representations have been made in the Application and in the Kramer Affidavit sufficient to demonstrate that said attorneys neither hold nor represent any interest adverse to interest adverse to the Debtors, the Debtors’ estates, creditors, the Liquidating Trusts and their Beneficiaries or other interest parties with respect to the matters on which the Applicant is to be engaged as required by section 327(e), that Reed Smith’s employment is necessary and would be in the best interests of the Debtors’ estates, creditors, the Liquidating Trusts and their Beneficiaries, that all connections to the Debtors, creditors, Beneficiaries or any other parties in interest have been sufficiently disclosed, that proper and adequate notice has been given and that no other or further notice is necessary; upon the record herein and after due deliberation thereon, the relief should be granted as set forth below. Accordingly, it is

ORDERED as follows:

1. The Application is GRANTED;
2. Pursuant to the confirmed Plan, the Liquidating Trust Agreements and Section 327(e) of the Bankruptcy Code, the Liquidating Trustee is authorized to employ and retain Ann V. Kramer and the law firm of Reed Smith as its special counsel for insurance-related legal matters *nunc pro tunc* to November 1, 2010 in accordance with the terms and conditions set forth in the Application.
3. Reed Smith is authorized to render professional services to the Liquidating Trustee as set forth in the Application.
4. Reed Smith shall be compensated in accordance with the Application, the confirmed Plan and the Liquidating Trust Agreements. Reed Smith shall, otherwise, seek final approval of fees and expenses previously paid by the Liquidating Trustee in accordance with applicable provisions of the Bankruptcy Code including Sections 327, 328 and 330, the Bankruptcy Rules, the Local Rules, the Court's Orders and procedures and the Office of the United States Trustee's guidelines.

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5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

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Submitted by:

Michael S. Budwick, Esquire
Florida Bar No. 938777
mbudwick@melandrussin.com
MELAND RUSSIN & BUDWICK, P.A.
3000 Southeast Financial Center
200 South Biscayne Boulevard
Miami, Florida 33131
Telephone: (305) 358-6363
Telecopy: (305) 358-1221
Attorneys for Liquidating Trustee

Copies to:

Michael S. Budwick, Esq. (Attorney Budwick shall serve a copy of this Order on all interested parties upon receipt and shall file a Certificate of Service reflecting such service).

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
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In re:

Chapter 11

PALM BEACH FINANCE PARTNERS, L.P.,
a Delaware limited partnership, *et al.*,

Case No. 09-36379-BKC-PGH

Jointly Administered

Debtors.

**AFFIDAVIT OF ANN V. KRAMER IN SUPPORT OF APPLICATION FOR APPROVAL
OF EMPLOYMENT OF REED SMITH LLP AS SPECIAL COUNSEL TO THE
LIQUIDATING TRUSTEE, NUNC PRO TUNC TO NOVEMBER 1, 2010**

STATE OF NEW YORK)
) SS
COUNTY OF NEW YORK)

Ann V. Kramer, being duly sworn, deposes and says:

1. I am a partner in the law firm of Reed Smith LLP ("Reed Smith"). As such, I am duly authorized to execute this Affidavit (the "Affidavit") on behalf of Reed Smith.
2. I am an attorney at law, duly admitted to practice law in the State of New York, the United States Supreme Court, the United States Court of Appeals for the Second Circuit, and the United States District Courts for the Southern, Eastern and Northern Districts of New York.
3. I am familiar with, and have knowledge regarding, the matters set forth herein and make this Affidavit in support of the *Application for Approval of Employment of Reed Smith LLP as Special Counsel to the Liquidating Trustee, Nunc Pro Tunc to November 1, 2010* (the "Application") as special counsel for insurance-related legal matters, *nunc pro tunc* to November 1, 2010.
4. To the extent that any information disclosed herein requires amendment or modification upon Reed Smith's completion of further analysis, or as additional information

becomes available to Reed Smith, a supplemental affidavit will be submitted to the Court reflecting such amended or modified information.

5. Neither I nor Reed Smith hold or represent any interest adverse to the Debtors¹, the Debtors' estates, creditors, the Liquidating Trusts and their Beneficiaries or other interested parties.

6. Neither I nor Reed Smith has had or presently has any connection with any of the Debtors, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee or any person employed in the office of the United States Trustee, except that: (i) prior to confirmation of the Plan and post-confirmation, Reed Smith represented and continues to represent Geoffrey E. Varga in his capacity as the Joint Official Liquidator ("JOL") of Palm Beach Offshore, Ltd. and Palm Beach Offshore II, Ltd. (collectively, the "Offshore Funds"); (ii) the JOL, in his capacity as the Liquidating Trust Monitor for Palm Beach Finance II, L.P. (the "Monitor") has retained, pursuant to order of the Court [ECF No. 556], Edward J. Estrada and Reed Smith as general counsel to the Monitor, *nunc pro tunc* to November 1, 2010; and (iii) attorneys from Reed Smith may have appeared in the past and may appear in the future in other, unrelated cases in which one or more of said parties may be involved.

7. Neither I nor Reed Smith has or will represent any other entity in connection with these cases except the JOL for the Offshore Funds and the Monitor for Palm Beach Finance II, L.P. Neither I nor Reed Smith will accept any fee from any other party or parties in these cases except as provided in the confirmed Plan and Liquidating Trust Agreements for Palm Beach

¹ Capitalized terms not defined herein shall have the meaning ascribed such terms in the *Second Amended Joint Plan of Liquidation of Barry Mukamal, as Chapter 11 Trustee of Palm Beach Finance Partners, L.P. and Palm Beach Finance II, L.P., and Geoffrey Varga, as Joint Official Liquidator for Palm Beach Offshore, Ltd. and Palm Beach Offshore II, Ltd.* (the "Plan").

Finance Partners, L.P. and Palm Beach Finance II, L.P. (the “PBF II Liquidating Trust Agreement,” collectively, the “Liquidating Trust Agreements”) as to insurance-related legal matters and as provided in the confirmed Plan and PBF II Liquidating Trust Agreement as to matters pertaining to the Monitor or as agreed with the JOL for the Offshore Funds as to matters pertaining to the JOL and the Offshore Funds.

8. To check and clear potential conflicts of interest related to the Debtors’ bankruptcy cases, Reed Smith ran a report for each individual and entity listed on the creditor matrices (hereinafter the “Matrix”) prepared for the above-captioned jointly administered bankruptcy cases (the “Cases”) from Reed Smith’s internal conflicts check system which I reviewed. The Matrix is attached as Schedule 1.

9. Attached as Schedule 2 is a list of entities from Schedule 1 with which Reed Smith represents or has represented during the three years prior to the petition date, as explained therein under the column entitled “Nature of Connection with Reed Smith LLP.” Except with regard to the JOL and Monitor retentions described above, Reed Smith has not represented any creditor or other entity listed in Schedule 2 in any matter related to these Cases. Reed Smith may continue to represent entities listed on Schedule 2 in matters unrelated to these Cases.

10. Reed Smith is an international law firm with approximately 1,500 attorneys in more than 20 offices throughout the world. Despite Reed Smith’s efforts to identify and disclose Reed Smith’s connections with parties-in-interest in these Cases, Reed Smith is unable to state with certainty that every relevant client connection has been disclosed due to the size of Reed Smith and the fact that the Debtors have many creditors and other relationships. If Reed Smith discovers any additional connection, Reed Smith will file a supplemental disclosure with the Court.

11. The payment of professional fees and costs to be incurred by Reed Smith in the course of its representation of the Liquidating Trustee in these cases shall be pursuant to the Application, the confirmed Plan and the Liquidating Trust Agreements. Reed Smith will, otherwise, seek final approval of fees and expenses previously paid by the Liquidating Trustee in accordance with applicable provisions of the Bankruptcy Code including Sections 327, 328 and 330, the Bankruptcy Rules, the Local Rules, the Court's Orders and procedures and the Office of the United States Trustee's guidelines.

12. The Applicant's fees shall be paid as follows: (i) twenty percent (20%) of any affirmative recovery up to the first \$2,300,000 received by the Liquidating Trusts from a matter or matters pursued by the Applicant; and (ii) thirty percent (30%) of any affirmative recovery thereafter received by the Liquidating Trusts from a matter or matters pursued by the Applicant

13. Additionally, the Applicant intends to seek one-hundred (100%) reimbursement of all costs and expenses incurred in connection with these cases. The payment of expenses shall be without further order of the Court.

14. The Reed Smith attorneys and paraprofessionals who may provide services to the Liquidating Trustee, and their 2010 hourly rates, are:

Partners:	Ann V. Kramer -	\$715/hr.
	John B. Berringer -	\$620/hr.
Associates:	Jennifer Katz -	\$450/hr.
	Michael DiCanio -	\$380/hr.
Paraprofessionals:	Anne Suffern -	\$270/hr.
	Eugenia Hoyle -	\$250/hr.

This listing is not exclusive, and other professionals may perform services for the Liquidating Trustee. The Liquidating Trustee has been further advised that Reed Smith reviews and adjusts its rates annually.

15. There is no agreement of any nature as to the sharing of any compensation to be paid to Reed Smith in these bankruptcy cases.

Services to Be Provided by Reed Smith

16. Reed Smith's services shall include the following:

- a) Review and analysis of the Debtors' credit insurance coverage;
- b) Advice concerning, and potential prosecution of, insurance recovery claims or action(s) against credit and collateral insurers, insurance brokers or other potentially responsible parties.

17. Reed Smith is well-suited to serve as the Liquidating Trustee's special insurance counsel in these cases. Reed Smith is an international, full service law firm with more than 1,500 lawyers in over 20 offices. Specific to this Application, Reed Smith's Insurance Recovery Group has extensive experience in representing policyholders with respect to complex insurance claims and disputes, including the following selected matters:

- a) Before the United States Bankruptcy Court, Southern District of New York, Special Counsel to the Official Committee of Unsecured Creditors of Chemtura Corporation et al. (*In re Chemtura Corporation*, No. 09-11233 (REG)), with respect to insurance matters;
- b) Before the United States Bankruptcy Court, Southern District of New York, Special Counsel to the Debtors (*In re Lehman Brothers Holdings Inc.*, No. 08-13555 (JMP)), with respect to insurance matters;
- c) The debtors' counsel before the United States Bankruptcy Court, Western District of Pennsylvania (*In re Pittsburgh Corning Corporation*, No. 00-22876) (the "PCC Bankruptcy"), including with respect to insurance matters;

- d) The debtors' counsel before the United States Bankruptcy Court, Western District of Pennsylvania (*In re North American Refractories Company*, No. 02-20198) (the "NARCO Bankruptcy"), including with respect to insurance matters;
- e) The debtors' counsel before the United States Bankruptcy Court, Western District of Pennsylvania (*In re Global Industrial Technologies Inc.*, No. 02-21626) (the "GIT Bankruptcy"), including with respect to insurance matters;
- f) The debtors' counsel before the United States Bankruptcy Court, District of Delaware (*In re W.R. Grace & Co.*, No. 01-1139) (the "Grace Bankruptcy");
- g) The creditors' committee's counsel before the United States Bankruptcy Court, Southern District of Texas, (*In re ASARCO LLC*, No. 05-21207) (the "ASARCO Bankruptcy"); and
- h) Special Litigation and Insurance Coverage Counsel for Chapter 7 Trustee Howard M. Ehrenberg (*In re Axium International, Inc.*, No. 08-bk-10277-BB, Jointly Administered with *In re Diversity MSP, Inc.*, No. 08-bk-10376) before the United States Bankruptcy Court, Central District of California, Los Angeles Division, with respect to insurance matters and claims against insiders.

18. Before joining Reed Smith on February 1, 2008, I was a shareholder of Anderson Kill & Olick, PC ("Anderson Kill"). I have been representing policyholders in insurance recovery matters since 1988. While at Anderson Kill, I participated in the representations of the official committees of asbestos claimants as special insurance counsel in the PCC Bankruptcy, the NARCO Bankruptcy, the GIT Bankruptcy, the Grace Bankruptcy, the ASARCO Bankruptcy


and Federal Mogul Global, Inc., T&N Limited, bankruptcy proceedings, No. 01-10578 et al.
(Bankr. D. Del.).

19. Reed Smith is counsel to numerous entities seeking defense and indemnity insurance coverage, and has secured more than a billion dollars in insurance recoveries for its clients.²

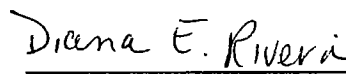
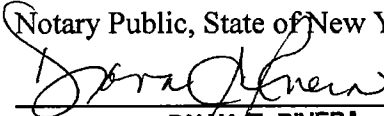
20. Reed Smith, therefore, has the experience necessary to perform the scope of the proposed and anticipated services related to insurance issues.

21. Neither Reed Smith nor I am a creditor, an equity security holder or an insider of the Debtors, creditors or Beneficiaries in these cases, nor have any members of Reed Smith nor I been an officer, director or employee of said Debtors, creditors or Beneficiaries or served as a financial advisor for the Debtors, creditors or Beneficiaries.

FURTHER AFFIANT SAYETH NAUGHT.


Ann V. Kramer, Esquire

SWORN TO AND SUBSCRIBED before me this 19th day of July, 2011 by Ann Kramer,
who is personally known to me and who took an oath.


Diana E. Rivera
Print Name
Notary Public, State of New York at Large

DIANA E. RIVERA
Notary Public, State of New York
No. 01RI5077896
Qualified in Richmond County
Commission Expires May 12, 2015

My Commission Expires:

² Due to confidentiality restrictions, such settlements may not be identified with specificity.

SCHEDULE 2

CREDITOR OR PARTY IN INTEREST	NATURE OF CONNECTION WITH REED SMITH LLP
Geoffrey Varga and Neil Morris, Joint Official Liquidators of Palm Beach Offshore	Prior to confirmation of the Plan and post-confirmation, Reed Smith represented and continues to represent Geoffrey Varga in his capacity as the Joint Official Liquidator ("JOL") of Palm Beach Offshore, Ltd. and Palm Beach Offshore II, Ltd. (collectively, the "Offshore Funds"). Additionally, the JOL, in his capacity as the Liquidating Trust Monitor for Palm Beach Finance II, L.P. retained Edward J. Estrada and Reed Smith as general counsel to the Monitor.
US Bank	Reed Smith represents US Bank in various unrelated matters.
Stillwater Capital Partners, Inc.	Reed Smith has represented Stillwater Capital in various unrelated matters.
Marder Investment Advisors Corp.	Reed Smith represents Marder Investment Advisors Corporation in various unrelated matters.
HSBC USA, Inc.	Reed Smith represents HSBC in various unrelated matters.
Globefin	Reed Smith represents Globefin US Advisors LLC in various unrelated matters.
Genesis Capital	Reed Smith represents Genesis Capital Corporation in various unrelated matters.
Fortis Prime Fund Solutions Custodial Services	Reed Smith represents Fortis Prime Fund Solutions Custodial Services in various unrelated matters.
Eden Rock Capital Management	Reed Smith represents Eden Rock Capital Management in various unrelated matters.
Debevoise & Plimpton	Reed Smith represents Debevoise & Plimpton in various unrelated matters.
ARIS Capital Management	Reed Smith represents ARIS Capital Management in various unrelated matters.

Mailing Information for Case 09-36379-PGH

Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive e-mail notice/service for this case.

- Geoffrey S. Aaronson gaaronson@aspalaw.com, tdmckeown@mckeownpa.com; sbeiley@aspalaw.com
- Paul A Avron pavron@bergersingerman.com, efile@bergersingerman.com
- Michael S Budwick mbudwick@melandrussin.com, ltannenbaum@melandrussin.com; mrbnefs@yahoo.com
- Heidi A Feinman Heidi.A.Feinman@usdoj.gov
- Jonathan S. Feldman jfeldman@melandrussin.com, ltannenbaum@melandrussin.com; mrbnefs@yahoo.com
- Robert C Furr bnasralla@furrcohen.com
- Solomon B Genet sgenet@melandrussin.com, ltannenbaum@melandrussin.com; mrbnefs@yahoo.com
- Jaclyn A Gonzalez jgonzalez@houghrobson.com, Houghrobson@gmail.com; sramirez.hr@gmail.com; jhough@houghrobson.com
- Ross R Hartog rhartog@mrthlaw.com, ecfnotices@mrthlaw.com; joyecf@mrthlaw.com; mrthbkc@gmail.com; ycandia@mrthlaw.com
- Julie E Hough jhough@houghlawgroup.com, Houghrobson@gmail.com; sramirez.hr@gmail.com; jmaceira@houghlawgroup.com
- Barry E Mukamal bankruptcy@marcumllp.com, FL64@ecfcbis.com
- Office of the US Trustee USTPRegion21.MM.ECF@usdoj.gov
- Leslie S. Osborne rappaport@kennethrappaportlawoffice.com
- John E Page jpage@sfl-pa.com, scusack@sfl-pa.com; lrosetto@sfl-pa.com
- Chad P Pugatch cpugatch.ecf@rprslaw.com
- Lane E Roesch lroesch@whitecase.com, tnelson@whitecase.com
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