Docket #0005 Date Filed: 12/11/2020

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: Welded Construction, L.P., *et al.*, Debtors.[1]	Chapter 11 Case No. 18-12378 (CSS) (Jointly Administered)
Welded Construction, L.P., Plaintiff, vs. Industrial Fabrics, Inc., Defendant.	Adv. No. 20-50932

CERTIFICATION OF COUNSEL REQUESTING EXTENSION OF TIME FOR DEFENDANT TO RESPOND TO THE COMPLAINT

I, Josef W. Mintz, Esq., counsel for the plaintiff in the above-captioned adversary proceeding (the "Adversary Proceeding"), hereby certify as follows:

1. On October 20, 2020, Welded Construction, L.P., as Post-effective Date Debtors (the "Plaintiff") initiated the Adversary Proceeding by the filing of an adversary *Complaint to Avoid Transfers Pursuant to 11 U.S.C. §§ 547, 548 and 502 and to Recover Property Transferred Pursuant to 11 U.S.C. § 550* (the "Complaint") [Docket No. 1] against Industrial Fabrics, Inc. (the "Defendant" together with Plaintiff the "Parties").

2. On November 11, 2020, a *Summons and Notice of Pretrial Conference In an Adversary Proceeding* (the "Summons") [Docket No. 4] was filed.

3. The Parties have engaged or are planning to engage in discussions concerning a potential resolution of the Adversary Proceeding and have agreed to continue these discussions prior to

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Welded Construction, L.P (5008) and Welded Construction Michigan, LLC (9830).

requiring Defendant to file its answer or other response to the Complaint. Accordingly, the Parties have agreed that the time within which Defendant may answer, move or otherwise plead to the Complaint should be extended to and including January 11, 2021. The Parties have memorialized their agreement in the *Stipulation Extending Time for Defendant to Respond to the Complaint* (the "Stipulation").

4. Attached hereto as Exhibit A is a proposed order (the "Order") approving the Stipulation. A copy of the Stipulation is attached to the Order as Exhibit 1.

WHEREFORE, the Parties respectfully request entry of the Order.

Dated: December 11, 2020

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EXHIBIT “A”

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: Welded Construction, L.P., *et al.*, Debtors.	Chapter 11 Case No. 18-12378 (CSS) (Jointly Administered)
Welded Construction, L.P., Plaintiff, vs. Industrial Fabrics, Inc., Defendant.	Adv. No. 20-50932

ORDER APPROVING STIPULATION EXTENDING TIME
FOR DEFENDANT TO RESPOND TO THE COMPLAINT

AND NOW upon consideration of the *Stipulation Extending Time for Defendant to Respond to the Complaint* (the "Stipulation") between Welded Construction, L.P., as Post-Effective Date Debtors (the "Plaintiff") and Industrial Fabrics, Inc. (the "Defendant") attached hereto as Exhibit "1"; the Court having determined that no further notice of the Stipulation must be given; it is hereby

ORDERED that the Stipulation is hereby **APPROVED**, and it is

FURTHER ORDERED that the time within which Defendant may answer, move or otherwise plead to the Complaint is hereby further extended to and including January 11, 2021.

EXHIBIT “1”

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: Welded Construction, L.P., *et al.*, Debtors.[1]	Chapter 11 Case No. 18-12378 (CSS) (Jointly Administered)
Welded Construction, L.P., Plaintiff, vs. Industrial Fabrics, Inc., Defendant.	Adv. No. 20-50932

STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO RESPOND TO THE COMPLAINT

Welded Construction, L.P. (the "Plaintiff"), and Industrial Fabrics, Inc. (the "Defendant" and, together with Plaintiff, the "Parties"), through their respective counsel, enter into this *Stipulation for Extension of Time For Defendant to Respond to the Complaint* (the "Stipulation") and hereby stipulate and agree as follows:

1. The Parties agree and stipulate that the time within which Defendant may answer, move, or otherwise plead to the Complaint [D.I. 1] is hereby further extended to and including January 11, 2021.

2. Defendant admits that Defendant is the proper party defendant as named in the Summons and Complaint.

3. In exchange for Plaintiff's agreement to extend the response deadline, Defendant agrees to waive any issues relating to service of process of the Summons and Complaint.

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Welded Construction, L.P (5008) and Welded Construction Michigan, LLC (9830).

Dated: December 11, 2020

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Dated: December 10, 2020

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Application Pro Hac Vice to be filed

Counsel for Defendant