IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:		Chapter 11
Welded Construction, L.P., et al.,		Case No. 18-12378 (CSS)
	Debtors. ¹	(Jointly Administered)
Welded Construction, L.P.,	Plaintiff,	
vs.		
Force Drilling LLC,	Defendant.	Adv. No. 20-50929

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

Welded Construction, L.P. (the "<u>Plaintiff</u>"), and Force Drilling LLC (the "<u>Defendant</u>" and, together with Plaintiff, the "<u>Parties</u>"), through their respective counsel, enter into this *Stipulation for Extension of Time For Defendant to Respond to the Complaint* (the "<u>Stipulation</u>") 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 December 24, 2020.

2. Defendant admits that Defendant is the proper party defendant as named in 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).



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.

Dated: December 8, 2020

BLANK ROME LLP

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-and-

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Counsel for the Post-Effective Date Debtors

Dated: December 8, 2020

METZ LEWIS BRODMAN MUST O'KEEFE LLC

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