

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
Welded Construction, L.P., <i>et al.</i> ,	Case No. 18-12378 (CSS)
Debtors. ¹	(Jointly Administered)
Welded Construction, L.P.,	Plaintiff,
vs.	Adv. No. 20-50930 (CSS)
Gwinnup's Restoration and Environmental Services, Inc.,	Defendant.

**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 and Recover Transfers Pursuant to 11 U.S.C. §§ 547, 548 and 550 and to Disallow Claims Pursuant to 11 U.S.C. § 502* (the “Complaint”) [Adv. Docket No. 1] against Gwinnup’s Restoration and Environmental Services, 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”) [Adv. Docket No. 4] was filed.

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. 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 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 7, 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 8, 2020

BLANK ROME LLP

By: /s/ Josef W. Mintz
Josef W. Mintz, Esq., DE SBN 5644
1201 Market Street, Suite 800
Wilmington, DE 19801
Telephone: (302) 425-6400
Email: mintz@blankrome.com

-and-

ASK LLP

Joseph L. Steinfeld, Jr., Esq., MN
SBN 0266292
2600 Eagan Woods Drive, Suite 400
St. Paul, MN 55121
Telephone: (651) 289-3845
Email: jsteinfeld@askllp.com

*Counsel for the Post-Effective Date
Debtors*

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:		Chapter 11
Welded Construction, L.P., <i>et al.</i> ,		Case No. 18-12378 (CSS)
Debtors.		(Jointly Administered)
Welded Construction, L.P.,	Plaintiff,	
vs.		
Gwinnup's Restoration and Environmental Services, Inc.,	Defendant.	Adv. No. 20-20-50930 (CSS)

**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 Gwinnup's Restoration and Environmental Services, 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 7, 2021.

EXHIBIT 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
Welded Construction, L.P., <i>et al.</i> ,	Case No. 18-12378 (CSS)
Debtors. ¹	(Jointly Administered)
Welded Construction, L.P., Plaintiff,	
vs.	Adv. No. 20-50930 (CSS)
Gwinnup's Restoration and Environmental Services, Inc., Defendant.	

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

Welded Construction, L.P. (the "Plaintiff"), and Gwinnup's Restoration and Environmental Services, 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 [Adv. Docket No. 1] is hereby extended to and including January 7, 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 8, 2020

BLANK ROME LLP

By: /s/ Josef W. Mintz
Josef W. Mintz, Esq., DE SBN 5644
1201 Market Street, Suite 800
Wilmington, DE 19801
Telephone: (302) 425-6400
Email: mintz@blankrome.com

-and-

ASK LLP

Joseph L. Steinfeld, Jr., Esq., MN SBN 0266292
2600 Eagan Woods Drive, Suite 400
St. Paul, MN 55121
Telephone: (651) 289-3845
Email: jsteinfeld@askllp.com

Counsel for the Post-Effective Date Debtors

Dated: December 4, 2020

BARNES & THORNBURG LLP

By: /s/ Kevin G. Collins
Kevin G. Collins (DE No. 5149)
1000 N. West Street, Suite 1500
Wilmington, DE 19801
Telephone: (302) 300-3455
Email: kcollins@btlaw.com

-and-

BOSE MCKINNEY & EVANS LLP

James P. Moloy
Nathan T. Danielson
111 Monument Circle, Suite 2700
Indianapolis, IN 46204
Telephone: (317) 684-5287
Email: jmoloy@boselaw.com
ndanielson@boselaw.com

Counsel for Defendant