

**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. <sup>1</sup>		(Jointly Administered)
Welded Construction, L.P.,	Plaintiff,	
vs.		
Sautter Crane Rental, Inc.,	Defendant.	Adv. No. 20-50946

**CERTIFICATION OF COUNSEL WITH RESPECT TO ORDER  
APPROVING STIPULATION FOR EXTENSION OF TIME FOR  
DEFENDANT TO RESPOND TO THE COMPLAINT**

The undersigned hereby certifies as follows:

1. On October 20, 2020, Welded Construction, L.P. (the “Plaintiff”) initiated the above-captioned adversary proceeding (the “Adversary Proceeding”) by filing the Complaint [Docket No. 1] against Sautter Crane Rental, Inc. (the “Defendant” and, together with Plaintiff, the “Parties”).
2. On November 10, 2020, the Defendant was served with the *Summons and Notice of Pretrial Conference in an Adversary Proceeding* [Docket No. 4].
3. Pursuant to Rule 7012(a) of the Federal Rules of Bankruptcy Procedure, the Defendants’ deadline to answer or otherwise respond to the Complaint (the “Response Deadline”) is December 10, 2020.

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<sup>1</sup> 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).



4. The Parties have agreed to extend the Response Deadline until January 4, 2021, and have entered into a stipulation to that effect (the “Stipulation”). A copy of the Stipulation is attached as Exhibit 1 to Exhibit A hereto. A proposed form of order approving the Stipulation is attached hereto as Exhibit A (the “Proposed Order”).

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as Exhibit A, at its earliest convenience

Dated: December 8, 2020  
Wilmington, Delaware

**RICHARDS, LAYTON & FINGER, P.A.**

*/s/ Robert C. Maddox*

Robert J. Stearn, Jr. (No. 2915)

Robert C. Maddox (No. 5356)

Garrett S. Eggen (No. 6655)

One Rodney Square

920 N. King Street

Wilmington, DE 19801

Telephone: (302) 651-7700

Facsimile: (302) 651-7701

Email: [stearn@rlf.com](mailto:stearn@rlf.com)  
[maddox@rlf.com](mailto:maddox@rlf.com)  
[eggen@rlf.com](mailto:eggen@rlf.com)

*Counsel for Defendant*

# **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.

Sautter Crane Rental, Inc.,

Defendant.

Adv. No. 20-50946

**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 Sautter Crane Rental, 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 4, 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. <sup>1</sup>	(Jointly Administered)
Welded Construction, L.P.,	Plaintiff,	
vs.		
Sautter Crane Rental, Inc.,	Defendant.	Adv. No. 20-50946

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

Welded Construction, L.P. (the “Plaintiff”), and Sautter Crane Rental, 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 [Docket No. 1] is hereby further extended to and including January 4, 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.

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<sup>1</sup> 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 8, 2020

**RICHARDS, LAYTON & FINGER, P.A.**

/s/ Robert C. Maddox  
Robert J. Stearn, Jr. (No. 2915)  
Robert C. Maddox (No. 5356)  
Garrett S. Eggen (No. 6655)  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801  
Telephone: (302) 651-7700  
Facsimile: (302) 651-7701  
Email: stearn@rlf.com  
maddox@rlf.com  
eggen@rlf.com

*Counsel for Defendant*