

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

In re:

Welded Construction, L.P. *et al.*,  
Debtors.<sup>1</sup>

Chapter 11

Case No. 18-12378 (CSS)

(Jointly Administered)

Welded Construction, L.P.,

Plaintiff,

Adv. Pro. No. 20-50937 (CSS)

v.

MAXX HDD, LLC

Defendant.

**STIPULATION EXTENDING TIME FOR DEFENDANT TO ANSWER, MOVE, OR  
OTHERWISE RESPOND TO THE COMPLAINT**

Welded Construction, L.P. (“Plaintiff”), and MAXX HDD, LLC (“Defendant” and together with the Plaintiff, the “Parties”), through their respective undersigned counsel, hereby stipulate and agree as follows:

1. The time within which Defendant must answer, move, or otherwise respond to the *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* (Adv. Dkt. No. 1) (the “Complaint”), is hereby extended to and including December 23, 2020 (the “Extension of Time”).

[Signature Page Follows]

<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 10, 2020

**BLANK ROME LLP**

/s/ Josef W. Mintz

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-and-

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*Counsel for Plaintiff Welded Construction, L.P.*

**AUSTRIA LEGAL, LLC**

/s/ Matthew P. Austria

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*Counsel for Defendant MAXX HDD, LLC*

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

In re:  Welded Construction, L.P. <i>et al.</i> ,  Debtors.	Chapter 11  Case No. 18-12378 (CSS)  (Jointly Administered)
Welded Construction, L.P.,  Plaintiff,  v.  MAXX HDD, LLC  Defendant.	Adv. Pro. No. 20-50937 (CSS)

**CERTIFICATE OF SERVICE**

I, Matthew P. Austria, hereby certify that on the 10<sup>th</sup> day of December, 2020, I caused a true and correct copy of the foregoing *Stipulation Extending Time For Defendant To Answer, Move, Or Otherwise Respond To The Complaint* to be served on the following parties in the manner indicated as well as on all parties receiving service through the Electronic Case Filing (ECF) system in this adversary proceeding:

<b><u>VIA FIRST CLASS MAIL</u></b> Joseph L. Steinfeld, Jr., Esq. Marianna Udem, Esq. ASK LLP 2600 Eagan Woods Drive, Suite 400 St. Paul, MN 55121	<b><u>VIA FIRST CLASS MAIL</u></b> Josef W. Mintz, Esq. Blank Rome LLP 1201 Market Street, Suite 800 Wilmington, DE 19801
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Date: December 10, 2020

**AUSTRIA LEGAL, LLC**

/s/Matthew P. Austria

Matthew P. Austria (No. 4827)