

**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.  | ) |                            |
|  | ) |                            |
| The Voto Manufacturers Sales Company,      | ) | Adv. Pro. No. 20-50956-CSS |
|  | ) |                            |
| Defendant.                                 | ) |                            |

**CERTIFICATION OF COUNSEL REQUESTING ENTRY OF ORDER APPROVING  
JOINT STIPULATION OF THE PLAINTIFF AND DEFENDANT THE VOTO  
MANUFACTURERS SALES COMPANY FOR EXTENSION OF TIME TO  
RESPOND TO THE COMPLAINT FILED IN THE ADVERSARY PROCEEDING**

Pursuant to Rule 7012-2 of the Local Rules of this Court, Defendant The Voto Manufacturers Sales Company (“Voto”) and Welded Construction, L.P., the Plaintiff, for the bankruptcy estates of Welded Construction, L.P. *et al.*, through counsel, hereby stipulate to an extension of the deadline by which Voto may file a response to the Complaint filed against Voto by the Plaintiff in the above captioned adversary proceeding (the “Adversary Proceeding”) currently pending before this Court by thirty (30) days, from December 16, 2020 to January 15, 2021, and states as follows:

1. On October 20, 2020, the Plaintiff commenced the Adversary Proceeding in this Court by filing the Complaint against Voto seeking avoidance and recovery of alleged preferential transfers (the “Preference Avoidance Complaint”). (D.I. 1).

<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).



2. As the summons is dated November 10, 2020, pursuant to Fed. Bank. R. P. 7012, and was received by Voto on November 16, 2020, Voto's response to the Preference Avoidance Complaint is due no later than December 16, 2020.

3. Attached hereto as **Exhibit 1** is a proposed agreed form of order granting the Motion. The Plaintiff has no opposition to entry of the proposed order.

4. Voto therefore respectfully requests that the Court approve the proposed form of order, attached hereto as **Exhibit 1**, at its earliest convenience.

Date: December 15, 2020

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# **EXHIBIT 1**

**IN THE UNITED STATES BANKRUPTCY COURT  
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|  |   |                            |
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| Debtors. <sup>1</sup>                      | ) | (Jointly Administered)     |
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| Welded Construction, L.P.,                 | ) |                            |
|  | ) |                            |
| Plaintiff,                                 | ) |                            |
| vs.  | ) |                            |
|  | ) |                            |
| The Voto Manufacturers Sales Company,      | ) | Adv. Pro. No. 20-50956-CSS |
|  | ) |                            |
| Defendant.                                 | ) |                            |

**ORDER APPROVING JOINT STIPULATION OF THE PLAINTIFF AND  
DEFENDANT THE VOTO MANUFACTURERS SALES COMPANY FOR EXTENSION  
OF TIME TO RESPOND TO COMPLAINTS FILED IN ADVERSARY PROCEEDINGS**

Upon consideration of the Stipulation of the Trustee and Defendant The Voto Manufacturers Sales Company for Extension of Time to Respond to the Complaint filed in the Adversary Proceeding (the “Stipulation”) and after due deliberation; and it appearing that sufficient cause exists for granting the relief requested by the parties under the Stipulation; it is hereby:

ORDERED that the Stipulation is approved and incorporated by reference herein; and it is further

ORDERED that the Court shall retain jurisdiction to hear and determine all matters arising from or related to the Stipulation and this Order.

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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).

