

**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.		
Force Drilling LLC,	Defendant.	Adv. No. 20-50929

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

Welded Construction, L.P. (the “Plaintiff”), and Force Drilling LLC (the “Defendant” and, together with Plaintiff, the “Parties”), through their respective counsel, enter into this *Stipulation for Second 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 [D.I. 1] is hereby further 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.

<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 M



Dated: December 23, 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 23, 2020

**METZ LEWIS BRODMAN MUST  
O'KEEFE LLC**

By: /s/ John R. O'Keefe, Jr.

John R. O'Keefe, Jr., Esq., PA SBN 36633  
535 Smithfield Street, 8<sup>th</sup> Floor  
Pittsburgh, PA 15222  
Telephone: (412) 918-1100  
Email: jokeefe@metzlewis.com

*Counsel for Defendant*