

**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.	
Blasting Services, Inc.,	Adv. No. 20-50925 (CSS)
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 Transfers Pursuant to 11 U.S.C. §§ 547, 548 and 502 and to Recover Property Transferred Pursuant to 11 U.S.C. § 550* (the “Complaint”) [Docket No. 1] against Blasting 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”) [Docket No. 4] was filed.

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

---

<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).



181237821010600000000002

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 11, 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: January 6, 2021

**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.		
Blasting Services, Inc.,	Defendant.	Adv. No. 20-50925 (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 Blasting 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 11, 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.		
Blasting Services, Inc.,	Defendant.	Adv. No. 20-50925 (CSS)

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

Welded Construction, L.P. (the “Plaintiff”), and Blasting 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 [Docket No. 1] is hereby further extended to and including January 11, 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 Michigan, LLC (9830).

Dated: January 6, 2021

**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: January 4, 2021

**Fox Rothschild LLP**

By: /s/ Seth Niederman  
Seth Niederman, Esq., DE SBN 4588  
919 North Market Street, Suite 300  
Wilmington, DE 19899-2323  
Telephone: (302) 622-4238  
Email: sniederman@foxrothschild.com

Counsel for Defendant