

**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,

vs.

Redstone International Inc.,

Defendant.

Adv. No. 20-50945

**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 Redstone International, 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.

<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).



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3. The parties have previously agreed to extend the time for the Defendant to answer, move or otherwise plead to the Complaint to January 11, 2021. A second extension was given until February 10, 2021.

4. 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 requiring Defendant to file its answer or other response to the Complaint. Furthermore, to the extent a resolution cannot be reached, the Defendant requires additional time to retain local counsel in this matter. 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 March 12, 2021. The Parties have memorialized their agreement in the *Stipulation Extending Time for Defendant to Respond to the Complaint* (the “Stipulation”).

5. 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: February 10, 2021

**BLANK ROME LLP**

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*-and-*

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*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. <sup>1</sup>	(Jointly Administered)
Welded Construction, L.P.,	Plaintiff,	
vs.		
Redstone International, Inc.,	Defendant.	Adv. No. 20-50945

**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 Redstone International, 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 March 12, 2021. Additionally, Initial Disclosures shall be exchanged on or before March 19, 2021.

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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).

## **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.		
Redstone International Inc.,	Defendant.	Adv. No. 20-50945

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

Welded Construction, L.P. (the “Plaintiff”), and Redstone International, 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 March 12, 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: February 10, 2021

**BLANK ROME LLP**

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Dated: February 10, 2021

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