

**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. ¹)	(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 THIRD 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 jointly stipulate to a third 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 February 15, 2021 to March 17, 2021 (the “Joint Stipulation for the Third Extension”), 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).

¹ 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 was due no later than December 16, 2020.

3. On January 14, 2021, the Court signed the Second Extension of Time to Respond to the Complaint extending the time from January 15, 2021 to February 15, 2021. (D.I. 14).

4. For the Joint Stipulation for the Third Extension, attached hereto as **Exhibit 1** is a proposed agreed form of order granting the Joint Stipulation for the Third Extension. The Plaintiff has no opposition to entry of the proposed order.

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

Date: February 17, 2020

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EXHIBIT 1

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Welded Construction, L.P., <i>et al.</i> ,)	Case No. 18-12378 (CSS)
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Plaintiff,)	
vs.)	
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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 THIRD EXTENSION OF
TIME TO RESPOND TO COMPLAINT FILED IN ADVERSARY PROCEEDING**

Upon consideration of the Joint Stipulation of the Trustee and Defendant The Voto Manufacturers Sales Company for Third Extension of Time to Respond to the Complaint filed in the Adversary Proceeding (the “Joint Stipulation for the Second Extension” and/or “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.

¹ 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).

