

**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.		
Williams Scotsman, Inc.,	Defendant.	Adv. No. 20-50959
Williams Scotsman, Inc.,	Counter-Plaintiff,	
vs.		
Welded Construction, L.P.	Counter-Defendant.	

**CERTIFICATION OF COUNSEL REQUESTING EXTENSION OF TIME  
FOR COUNTER-DEFENDANT TO RESPOND TO THE COMPLAINT**

I, Josef W. Mintz, Esq., counsel for the plaintiff and counter-defendant 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” or “Counter-Defendant”) 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

<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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Williams Scotsman, Inc. (the “Defendant” or “Counter-Plaintiff,” together with Plaintiff, the “Parties”).

2. On November 10, 2020, a *Summons and Notice of Pretrial Conference in an Adversary Proceeding* (the “Summons”) [Docket No. 2] was filed.

3. On March 10, 2021, Defendant filed its Answer and Counterclaim to the Complaint [Docket No. 18].

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 Counter-Defendant to file its answer or other response to the Counterclaim. Accordingly, the Parties have agreed that the time within which Counter-Defendant may answer, move or otherwise plead to the Counterclaim should be extended to and including May 5, 2021. The Parties have memorialized their agreement in the *Stipulation Extending Time for Counter-Defendant to Respond to the Counterclaim* (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: April 8, 2021

**BLANK ROME LLP**

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-and-

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# **EXHIBIT A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<p>In re:</p> <p>Welded Construction, L.P., <i>et al.</i>,</p> <p style="text-align: right;">Debtors.<sup>1</sup></p>	<p>Chapter 11</p> <p>Case No. 18-12378 (CSS)</p> <p>(Jointly Administered)</p>
<p>Welded Construction, L.P.,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>Williams Scotsman, Inc.,</p> <p style="text-align: right;">Defendant.</p>	<p>Adv. No. 20-50959</p>
<p>Williams Scotsman, Inc.,</p> <p style="text-align: right;">Counter-Plaintiff,</p> <p>vs.</p> <p>Welded Construction, L.P.</p> <p style="text-align: right;">Counter-Defendant.</p>	

**ORDER APPROVING STIPULATION EXTENDING TIME  
FOR COUNTER-DEFENDANT TO RESPOND TO THE COUNTERCLAIM**

AND NOW upon consideration of the *Stipulation Extending Time for Counter-Defendant to Respond to the Counterclaim* (the “Stipulation”) between Welded Construction, L.P., as Post-Effective Date Debtors (the “Plaintiff” and “Counter-Defendant”) and Williams Scotsman, Inc. (the “Defendant” and “Counter-Plaintiff”) 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

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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).

**FURTHER ORDERED** that the time within which Counter-Defendant may answer, move or otherwise plead to the Complaint is hereby further extended to and including May 5, 2021.

## **EXHIBIT 1**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<p>In re:</p> <p>Welded Construction, L.P., <i>et al.</i>,</p> <p style="text-align: right;">Debtors.<sup>1</sup></p>	<p>Chapter 11</p> <p>Case No. 18-12378 (CSS)</p> <p>(Jointly Administered)</p>
<p>Welded Construction, L.P.,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>Williams Scotsman, Inc.,</p> <p style="text-align: right;">Defendant.</p>	<p>Adv. No. 20-50959</p>
<p>Williams Scotsman, Inc.,</p> <p style="text-align: right;">Counter-Plaintiff,</p> <p>vs.</p> <p>Welded Construction, L.P.</p> <p style="text-align: right;">Counter-Defendant.</p>	

**STIPULATION FOR EXTENSION OF TIME FOR  
COUNTER-DEFENDANT TO RESPOND TO THE COUNTERCLAIM**

Welded Construction, L.P. (the “Plaintiff” and “Counter-Defendant”), and Williams Scotsman, Inc. (the “Defendant” and “Counter-Plaintiff”, together with Plaintiff and Counter-Defendant, the “Parties”), through their respective counsel, enter into this *Stipulation for Extension of Time For Counter-Defendant to Respond to the Counterclaim* (the “Stipulation”) and hereby stipulate and agree as follows:

1. The Parties agree and stipulate that the time within which Counter- Defendant may answer, move, or otherwise plead to the Counterclaim [Docket No. 18] is hereby further extended to and including May 5, 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).



Dated: April 8, 2021

**BLANK ROME LLP**

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Dated: April 5, 2021

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<sup>2</sup> The above-referenced counsel will be filing a motion for admission pro hac vice concurrently with the filing of a responsive pleading to the Complaint.