

**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.	
Worldwide Machinery, Inc. dba Worldwide Rental Services,	Adv. No. 20-50960
Defendant.	

**CERTIFICATION OF COUNSEL REQUESTING EXTENSION OF TIME  
FOR DEFENDANT TO RESPOND TO PLAINTIFF'S WRITTEN  
DISCOVERY REQUESTS**

I, Josef W. Mintz, Esq., counsel for the plaintiff in the above-captioned adversary proceeding (the "Adversary Proceeding"), hereby certify as follows:

1. On March 01, 2021, Welded Construction, L.P. ("Plaintiff"), served its *First Set Of Interrogatories, Requests For Production, And Requests For Admission Propounded by Plaintiff* (the "Discovery Requests"), on Worldwide Machinery, Inc. dba Worldwide Rental Services (the "Defendant").

2. The Parties have agreed that the time within which Defendant may respond to the Discovery Requests be extended to and including May 28, 2021. The Parties have

---

<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).



memorialized their agreement in the *Stipulation Extending Time for Defendant to Respond to Plaintiff's Written Discovery Requests* (the "Stipulation").

3. 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 29, 2021

**BLANK ROME LLP**

By: /s/ Josef W. Mintz  
Josef W. Mintz, Esq., DE No. 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**

<p>In re:</p> <p>Welded Construction, L.P., <i>et al.</i>,</p> <p style="text-align: right;">Debtors.</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>Worldwide Machinery, Inc. dba Worldwide Rental Services,</p> <p style="text-align: right;">Defendant.</p>	<p>Adv. No. 20-50960</p>

**ORDER APPROVING STIPULATION EXTENDING TIME FOR DEFENDANT TO  
RESPOND TO THE PLAINTIFF’S WRITTEN DISCOVERY REQUESTS**

AND NOW upon consideration of the *Stipulation Extending Time for Defendant to Respond to Plaintiff’s Written Discovery Requests* (the “Stipulation”) between Welded Construction, L.P., as Post-Effective Date Debtor (the “Plaintiff”) and Worldwide Machinery, Inc. dba Worldwide Rental Services (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 respond to the *First Set Of Interrogatories, Requests For Production, And Requests For Admission Propounded by Plaintiff* is hereby extended to and including May 28, 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.</p>	<p>Chapter 11</p> <p>Case No. 18-12378 (CSS)</p> <p>(Jointly Administered)</p>
<hr/> <p>Welded Construction, L.P.,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>Worldwide Machinery, Inc. dba Worldwide Rental Services,</p> <p style="text-align: right;">Defendant.</p>	<p>Adv. No. 20-50960</p>

**STIPULATION FOR EXTENSION OF TIME FOR  
DEFENDANT TO RESPOND TO PLAINTIFF’S WRITTEN DISCOVERY REQUESTS**

Welded Construction, L.P. (the “Plaintiff”), and Worldwide Machinery, Inc. dba Worldwide Rental Services (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 Plaintiff’s Written Discovery Requests* (the “Stipulation”) and hereby stipulate and agree as follows:

1. The Parties agree and stipulate that the time within which Defendant may respond to *First Set of Interrogatories, Requests For Production, And Requests For Admission Propounded by Plaintiff* is hereby further extended to and including May 28, 2021.

Dated: April 29, 2021

**BLANK ROME LLP**

By: /s/ Joseph W. Mintz  
Josef W. Mintz, Esq., DE No 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: April 28, 2021

**CAMPBELL & LEVINE, LLC**

By: /s/ Mark T. Hufford  
Mark T. Hurford (Bar No. 3299)  
222 Delaware Avenue, Suite 1620  
Wilmington, DE 19801  
Phone: (302) 426-1900  
Fax: (302) 426-9947  
Email: mhurford@camlev.com

**BERNSTEIN-BURKLEY, P.C.**

By: /s/ Keri P. Ebeck  
Keri P. Ebeck, Esq., PA I.D. #91298  
kebeck@bernsteinlaw.com  
Keila Estevez, Esq., PA ID #324601  
kestevez@bernsteinlaw.com  
Suite 2200, Gulf Tower  
Pittsburgh, PA 15219  
Phone (412) 456-8112  
Fax: (412) 456-8135

*Counsel for Defendant*