IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

WELDED CONSTRUCTION, et al.,

Debtors.

Welded Construction, L.P.

Plaintiff,

vs.

Veriforce, LLC,

Defendant.

Chapter 11 Case No. 18-12378-CSS

(Jointly Administered)

Adv. Proc. No. 20-50955-CSS

DEFENDANT'S REQUEST FOR ORAL ARGUMENT

Pursuant to Rule 7.1.4 of the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware, defendant, Veriforce, LLC, respectfully requests that the Court schedule oral argument on its Motion to Re-Open Adversary Proceeding and Vacate Default Judgment (D.I. 18), which is fully briefed (D.I. 22; D.I. 23), at a time convenient for the Court.

Dated: November 17, 2021

<u>/s/ James G. McMillan, III</u> James G. McMillan, III (DE Bar No. 3979) HALLORAN FARKAS + KITTILA LLP 5801 Kennett Pike, Suite C/D Wilmington, Delaware 19807 Phone: (302) 257-2103 Fax: (302) 257-2019 Email: jm@hfk.law

And

Henry A. King Robert J. Burvant



W. Spencer King KING & JURGENS, L.L.C. 201 St. Charles Avenue, 45th Floor New Orleans, LA 70170 Telephone: (504) 582-3800 Fax: (504) 582-1233 hking@kingjurgens.com rburvant@kingjurgens.com sking@kingjurgens.com

Counsel to Defendant, Veriforce, LLC