

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

In re: WELDED CONSTRUCTION, <i>et al.</i> , Debtors.	Chapter 11 Case No. 18-12378-CSS (Jointly Administered)
Welded Construction, L.P. Plaintiff, vs. Veriforce, LLC, Defendant.	Adv. Proc. No. 20-50955-CSS

DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

Veriforce, LLC (“Veriforce”), by and through its undersigned counsel, moves this Court for Summary Judgment pursuant to Rule 56(c) of the Federal Rules of Civil Procedure made applicable to adversary proceedings by Rule 7056 of the Federal Rules of Bankruptcy Procedure. As set forth in its *Brief in Support of Defendant’s Motion for Summary Judgment* filed contemporaneously herewith, summary judgment is proper on Veriforce’s ordinary course of business defense pursuant to 11 U.S.C. § 547(c)(2) because there are no genuine issues of material fact and Veriforce is entitled to judgment in its favor as a matter of law.

WHEREFORE, Veriforce respectfully requests that this Court grant Defendant’s Motion for Summary Judgment, dismissing all claims asserted in Welded Construction’s Complaint, with prejudice, and awarding any other or additional relief it deems just and equitable.

Dated: January 26, 2022



/s/ James G. McMillan, III

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