

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

In re:

Welded Construction, L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 18-12378 (CSS)

(Jointly Administered)

Welded Construction, L.P.,

Plaintiff,

vs.

Veriforce, LLC,

Defendant.

Adv. No. 20-50955-CSS

**CERTIFICATION OF COUNSEL REGARDING STIPULATION EXTENDING
TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

I, Jose F. Bibiloni, Esq., counsel for the plaintiff 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”) 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”) [Adv. D.I. 1] against Veriforce, LLC (the “Defendant,” together with Plaintiff, the “Parties”).

2. On January 26, 2022, Defendant filed its *Defendant's Opening Brief in Support of its Motion for Summary Judgment* (the “Motion for Summary Judgment”) [See Adv. D.I. 32, 33].

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).



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3. The Parties have engaged in discussions concerning a potential resolution of the Adversary Proceeding and have agreed to continue these discussions prior to requiring Plaintiff to file a response to the Motion for Summary Judgment. Accordingly, the Parties have agreed that the time within which Plaintiff may respond to the Motion for Summary Judgment should be extended to and including February 23, 2022. The Parties have memorialized their agreement in the *Stipulation Extending Time for Plaintiff to Respond to Defendant's Summary Judgment Motion* (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: February 9, 2022

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EXHIBIT A

**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.	(Jointly Administered)
Welded Construction, L.P.,	Plaintiff,	
vs.		
Veriforce, LLC,	Defendant.	Adv. No. 20-50955-CSS

**ORDER APPROVING STIPULATION EXTENDING TIME
FOR PLAINTIFF TO RESPOND TO
DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

AND NOW upon consideration of the *Stipulation Extending Time for Plaintiff to Respond to Defendant’s Motion for Summary Judgment* (the “Stipulation”) between Welded Construction, L.P. (the “Plaintiff”) and Veriforce, LLC (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 Plaintiff may respond to Defendant’s Motion for Summary Judgment is hereby extended to and including February 23, 2022.

EXHIBIT 1

**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.		
Veriforce, LLC,	Defendant.	Adv. No. 20-50955-CSS

**STIPULATION EXTENDING TIME FOR PLAINTIFF TO RESPOND
TO DEFENDANT’S SUMMARY JUDGMENT MOTION**

Plaintiff, Welded Construction, L.P. (the “Plaintiff”) and Defendant, Veriforce, LLC (the “Defendant”) through their respective counsel, hereby enter into this Stipulation Extending Time for Plaintiff to Respond to Defendant’s Summary Judgment Motion and agree and stipulate as follows:

1. On January 26, 2022, Defendant filed its *Defendant’s Opening Brief in Support of its Motion for Summary Judgment* (the “Motion for Summary Judgment”) [See Adv. D.I. 32, 33].
2. The time for responding to the Motion for Summary Judgment has not expired.
3. The parties have engaged in discussions regarding the possibility of settlement and wish to minimize the incurrence of costs while such discussions persist.

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).

4. The parties hereby stipulate and agree that Plaintiff's time for responding to the Motion for Summary Judgment shall be and hereby is extended through and including February 23, 2022.

5. This stipulation is without prejudice to requests for further extensions.

AGREED TO BY:

Dated: February 9, 2022

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Dated: February 9, 2022

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