IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:		Chapter 11
Welded Construction, L.P., et al.,		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.

Dated: February 10th, 2022 Wilmington, Delaware

CHRISTOPHER S. SONTCHI UNITED STATES BANKRUPTCY JUDGE



EXHIBIT 1

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:		Chapter 11
Welded Construction, L.P., et a	<i>l.</i> , Debtors. ¹	Case No. 18-12378 (CSS) (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 "<u>Plaintiff</u>") and Defendant, Veriforce, LLC (the "<u>Defendant</u>") 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

BLANK ROME LLP

By: <u>/s/ Jose F. Bibiloni</u> Josef W. Mintz, Esq., DE 5644 Jose F. Bibiloni, Esq., DE 6261 1201 Market Street, Suite 800 Wilmington, DE 19801 Telephone: (302) 425-6400 Email: mintz@blankrome.com Email: jose.bibiloni@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 Plaintiff

Dated: February 9, 2022

HALLORAN FARKAS + KITTILA LLP

<u>/s/ James G. McMillan, III</u> James G. McMillan, III, DE SBN 3979 5801 Kennett Pike, Suite C/D Wilmington, DE 19807 Telephone: (302) 257-2103 Email: jm@hfk.law

-and-

KING & JURGENS, LLC Henry A. King Robert J. Burvant W. Spencer King 201 St. Charles Avenue, 45th Fl. New Orleans, LA 70170 Telephone: (504) 582-3800 Email: hking@kingjurgens.com rburvant@kingjurgens.com sking@kingjurgens.com

Counsel for Defendant