

**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 (LSS)

(Jointly Administered)

Welded Construction, L.P.,

Plaintiff,

vs.

Adv. No. 20-50932

Industrial Fabrics, Inc.,

Defendant.

**CERTIFICATION OF COUNSEL REQUESTING EXTENSION OF TIME
FOR THE PARTIES TO RESPOND TO MOTIONS FOR SUMMARY JUDGMENT**

I, Josef W. Mintz, 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”) [Docket No. 1] against Industrial Fabrics, Inc. (the “Defendant,” together with Plaintiff, the “Parties”).

2. On March 24, 2022, the Defendant filed the *Industrial Fabrics, Inc.’s Motion for Summary Judgment* (the “Defendant Summary Judgment Motion”) [Docket No. 39].

3. On March 30, 2022, the Plaintiff filed the *Plaintiff’s Motion for Summary Judgment with Respect to Plaintiff’s Claims Against Defendant Industrial Fabrics, Inc.* (the “Plaintiff”

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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Summary Judgment Motion” and together with the Defendant Summary Judgment Motion, the “Motions for Summary Judgment”).

4. The Parties require additional time to adequately assess and prepare responses to the Motions for Summary Judgment. Accordingly, the Parties have agreed that the time within which they may respond to the Motions for Summary Judgment should be extended by thirty (30) days. The Parties have memorialized their agreement in the *Stipulation Extending Time for Parties to Respond to Motions for Summary Judgment* (the “Stipulation”).

5. 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 1, 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 (LSS)
	Debtors. ¹	(Jointly Administered)
Welded Construction, L.P.,	Plaintiff,	
vs.		Adv. No. 20-50932
Industrial Fabrics, Inc.,	Defendant.	

**ORDER APPROVING STIPULATION EXTENDING TIME
FOR THE PARTIES TO RESPOND TO MOTIONS FOR SUMMARY JUDGMENT**

AND NOW upon consideration of the *Stipulation Extending Time for the Parties to Respond to Motions for Summary Judgment* (the “Stipulation”) between Welded Construction, L.P., as Post-Effective Date Debtors (the “Plaintiff”) and Industrial Fabrics, Inc. (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 *Industrial Fabrics, Inc.’s Motion for Summary Judgment* [Docket No. 39] is hereby extended by thirty (30) days, through and including May 7, 2022 at 11:59 p.m.; and it is

FURTHER ORDERED that the time within which Defendant may respond to *Plaintiff’s Motion for Summary Judgment with Respect to Plaintiff’s Claims Against Defendant Industrial*

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Fabrics, Inc. [Docket No. 42] is hereby extended by thirty (30) days, through and including May 13, 2022 at 11:59 p.m.; and it is

FURTHER ORDERED that nothing herein shall prejudice either party from requesting further extensions.

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 (LSS)
Debtors. ¹	(Jointly Administered)
Welded Construction, L.P.,	Adv. No. 20-50932
Plaintiff,	
vs.	
Industrial Fabrics, Inc.,	Adv. No. 20-50932
Defendant.	

**STIPULATION FOR EXTENSION OF TIME FOR
THE PARTIES TO RESPOND TO MOTIONS FOR SUMMARY JUDGMENT**

Welded Construction, L.P. (the “Plaintiff”), and Industrial Fabrics, Inc. (the “Defendant” and, together with Plaintiff, the “Parties”), through their respective counsel, enter into this *Stipulation for Extension of Time for the Parties to Respond to Motions for Summary Judgment* (the “Stipulation”) and hereby stipulate and agree as follows:

1. The time within which Plaintiff may respond to *Industrial Fabrics, Inc.’s Motion for Summary Judgment* [Docket No. 39] is hereby extended by thirty (30) days, through and including May 7, 2022 at 11:59 p.m.
2. The time within which Defendant may respond to *Plaintiff’s Motion for Summary Judgment with Respect to Plaintiff’s Claims Against Defendant Industrial Fabrics, Inc.* [Docket No. 42] is hereby extended by thirty (30) days, through and including May 13, 2022 at 11:59 p.m.
3. This stipulation is without prejudice to requests for further extensions.

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Dated: April 1, 2022

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Dated: April 1, 2022

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