

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

In re:

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

Debtors.

Chapter 11

Case No. 18-12378 (LSS)

(Jointly Administered)

Welded Construction, L.P.,

Plaintiff,

vs.

Industrial Fabrics, Inc.,

Defendant.

Adv. No. 20-50932 (LSS)

Re: Adv. Pro. Nos. 39, 42, 47, 51

**CERTIFICATION OF COUNSEL REQUESTING EXTENSION OF TIME FOR
THE PARTIES TO FILE A REPLY TO RESPONSES
TO THE MOTIONS FOR SUMMARY JUDGMENT**

I, James Tobia, Esq., counsel for the defendant 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 Summary



Judgment Motion” and together with the Defendant Summary Judgment Motion, the “Motions for Summary Judgment”) [Docket No. 42]

4. On May 9, 2022, the Plaintiff filed the Plaintiff’s Response in Opposition to Defendant’s Motion for Summary Judgment (the “Plaintiff Response”) [Docket No. 47].

5. On May 13, 2022, the Defendant filed the Defendant’s Memorandum of Law in Support of Industrial Fabrics, Inc.’s Opposition to Plaintiffs Motion for Summary Judgment (the “Defendant Response” and together with the Plaintiff Response, the “Responses”) [Docket No. 51].

6. The Parties require additional time to adequately assess and prepare replies to the Responses. Accordingly, the Parties have agreed that the time within which they may respond to the Response should be extended by four (4) days. The Parties have memorialized their agreement in the Stipulation for Extension of Time for the Parties to File a Reply to Responses to the Motions for Summary Judgment (the “Stipulation”).

7. 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: May 13, 2022

**THE LAW OFFICE OF
JAMES TOBIA, LLC**
By: /s/ James Tobia
James Tobia, Esq. (#3798)
1716 Wawaset Street
Wilmington, DE 19806
Tel. (302) 655-5303
Fax (302) 656-8053
Email: jtobia@tobialaw.com

-and-

JONES & ASSOCIATES

By: /s/ Roland Gary Jones

Roland Gary Jones, Esq.

1325 Avenue of the Americas, 28th
Floor

New York, New York 10019

Tel: (347) 862-9254

Fax: (212) 202-4416

Email: rgj@rolandjones.com

Counsel for Defendant

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.	(Jointly Administered)
Welded Construction, L.P.,	Plaintiff,
vs.	Adv. No. 20-50932 (LSS)
Industrial Fabrics, Inc.,	Re: Adversary Proceeding No. ____
Defendant.	

**ORDER APPROVING STIPULATION EXTENDING TIME
FOR THE PARTIES TO FILE A REPLY TO RESPONSES
TO THE MOTIONS FOR SUMMARY JUDGMENT**

AND NOW upon consideration of the *Stipulation for Extension of Time for the Parties to file a Reply to the Responses to the 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 Defendant may file a reply to the *Plaintiff’s response to Industrial Fabrics, Inc.’s Motion for Summary Judgment* is hereby extended, through and including May 20, 2022 at 11:59 p.m.

FURTHER ORDERED that the time within which Plaintiff may file a reply to the *Defendant’s response to the Plaintiff’s Motion for Summary Judgment* is hereby extended, through and including May 24, 2022 at 11:59 p.m.

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.	(Jointly Administered)
Welded Construction, L.P.,	Adv. No. 20-50932 (LSS)
Plaintiff,	Re: Adv. Pro. Nos. 39, 42, 47, 51
vs.	
Industrial Fabrics, Inc.,	
Defendant.	

**STIPULATION FOR EXTENSION OF TIME FOR
THE PARTIES TO FILE A REPLY TO RESPONSES
TO THE 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 file a Reply to the Responses to the Motions for Summary Judgment* (the “Stipulation”) and hereby stipulate and agree as follows:

1. The parties hereby agree and stipulate to extend by four (4) days the time within which the Defendant may file a reply to the *Plaintiff’s response to Industrial Fabrics, Inc.’s Motion for Summary Judgment* [Docket No. 47]. The deadline to file a reply is hereby extended, through and including May 20, 2022 at 11:59 p.m.

2. The parties hereby agree and stipulate to extend by four (4) days the time within which the Plaintiff may file a reply to the *Defendant’s response to the Plaintiff’s Motion for Summary*

Judgment [Docket No. 51]. The deadline to file a reply is hereby extended, through and including May 24, 2022 at 11:59 p.m.

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

Dated: May 13, 2022

BLANK ROME LLP

By: /s/ Josef W. Mintz
Josef W. Mintz, Esq., DE SBN 5644
1201 Market Street, Suite 800
Wilmington, DE 19801
Telephone: (302) 425-6400
Email: mintz@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 the Post-Effective Date Debtors

Dated: May 13, 2022

**THE LAW OFFICE OF JAMES TOBIA,
LLC**

By: /s/ James Tobia
James Tobia, Esq. (#3798)
1716 Wawaset Street
Wilmington, DE 19806
Tel. (302) 655-5303; Fax (302) 656-8053
Email: jtobia@tobialaw.com

-and-

JONES & ASSOCIATES

By: /s/ Roland Gary Jones
Roland Gary Jones, Esq.
1325 Avenue of the Americas, 28th Floor
New York, New York 10019
Tel: (347) 862-9254
Fax: (212) 202-4416
Email: rgj@rolandjones.com

Counsel for Defendant