

**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.

Industrial Fabrics, Inc.,

Defendant.

Adv. No. 20-50932

Re: Adv. Dkt. Nos. 39, 42

**APPLICATION FOR ORAL ARGUMENT
REGARDING PARTIES' COMPETING MOTIONS FOR SUMMARY JUDGMENT**

Pursuant to Rule 7007-3 of the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court for the District of Delaware, Welded Construction, L.P. (the "Plaintiff" or "Debtor"), hereby applies for the opportunity for oral argument on *Industrial Fabrics, Inc.'s Motion for Summary Judgment* [Adv. D.I. 39] and *Plaintiff's Motion for Summary Judgment With Respect to Plaintiff's Claims Against Defendant Industrial Fabrics, Inc.* [Adv. D.I. 42], including the responses and replies filed or to be filed in connection therewith.²

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).

² Pursuant to Local Rule 7007-3, the deadline for requesting oral argument on Defendant's motion for summary judgment is today. Although Plaintiff has yet to file a reply brief in support of Plaintiff's motion for summary



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judgment, Plaintiff believes that the issues are sufficiently similar so as to justify argument for both motions at the same time. By this Application, Plaintiff requests oral argument for both motions.