

**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 (LSS)
Industrial Fabrics, Inc.,	Re: Adv. D.I. 42, 43, 51, 56, 57, 60, 61
Defendant.	

**NOTICE OF COMPLETION OF BRIEFING REGARDING
PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT WITH RESPECT TO
PLAINTIFF'S CLAIMS AGAINST DEFENDANT INDUSTRIAL FABRICS, INC.**

PLEASE TAKE NOTICE OF THE FOLLOWING:

On March 24, 2022, Plaintiff Welded Construction, L.P. ("Plaintiff") filed *Plaintiff's Motion for Summary Judgment with Respect to Plaintiff's Claims Against Defendant Industrial Fabrics, Inc.* [Adv. D.I. 42] (the "Motion for Summary Judgment").

Briefing on the Motion for Summary Judgment is complete. The following documents are relevant to the Court's consideration of the Motion for Summary Judgment:

1. Plaintiff's Motion for Summary Judgment with Respect to Plaintiff's Claims Against Defendant Industrial Fabrics, Inc. [Adv. D.I. 42; filed March 24, 2022];
2. Memorandum of Law in Support of Plaintiff's Motion for Summary Judgment with Respect to Plaintiff's Claims Against Defendant Industrial Fabrics, Inc. [Adv. D.I. 43; filed March 24, 2022];
3. Memorandum of Law in Support of Industrial Fabrics, Inc.'s Opposition to

¹ The debtors in these chapter 11 cases (the "Debtors"), 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).



Plaintiff's Motion for Summary Judgment [Adv. D.I. 51; filed May 13, 2022];

4. Application for Oral Argument Regarding Parties' Competing Motions for Summary Judgment [Adv. D.I. 56; filed May 23, 2022].
5. Plaintiff's Reply in Support of Plaintiff's Motion for Summary Judgment with Respect to Plaintiff's Claims Against Defendant Industrial Fabrics, Inc. [Adv. D.I. 57; filed May 24, 2022];
6. Plaintiff's Motion to File Under Seal Plaintiff's Reply in Support of Plaintiff's Motion for Summary Judgment with Respect to Plaintiff's Claims Against Defendant Industrial Fabrics, Inc. [Adv. D.I. 60; filed May 27, 2022];
7. Notice of Filing of Proposed Redacted Version of Plaintiff's Reply in Support of Plaintiff's Motion for Summary Judgment with Respect to Plaintiff's Claims Against Defendant Industrial Fabrics, Inc. [Adv. D.I. 61; filed May 27, 2022].

Counsel for both parties are available at the Court's convenience should the Court have questions regarding the Motion for Summary Judgment and related briefing.

Dated: June 1, 2022
Wilmington, Delaware

BLANK ROME LLP

By: /s/ Josef W. Mintz
Josef W. Mintz, Esq. (DE No. 5644)
Lawrence R. Thomas III, Esq. (DE No. 6935)
1201 Market Street, Suite 800
Wilmington, DE 19801
Telephone: (302) 425-6400
Email: josef.mintz@blankrome.com
lorenzo.thomas@blankrome.com

-and-

ASK LLP

Joseph L. Steinfeld, Jr., Esq., MN SBN 0266292
Nicholas C. Brown, Esq., NC SBN 38054
2600 Eagan Woods Drive, Suite 400
St. Paul, MN 55121
Telephone: (651) 289-3845
Email: nbrown@askllp.com

-and-

Edward E. Neiger, Esq.
60 East 42nd Street, 46th Fl.
New York, NY 10165
Telephone: (212) 267-7342
Fax: (212) 918-3427

Counsel for Plaintiff, Welded Construction, L.P.