

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)
<i>Debtors.</i> <sup>1</sup>	(Jointly Administered)
<hr style="border-top: 1px dashed black;"/>	
Welded Construction, L.P.,	
<i>Plaintiff,</i>	
vs.	
Industrial Fabrics, Inc.,	Adversary Proceeding No. 20-50932-LSS
<i>Defendant.</i>	Re: Adv. D.I. 39, 40, 47, 49, 50, 56, 59, 62, 63

**NOTICE OF COMPLETION OF BRIEFING REGARDING DEFENDANT INDUSTRIAL  
FABRICS, INC.'S MOTION FOR SUMMARY JUDGMENT [ADV. DOCKET NO. 39]**

PLEASE TAKE NOTICE OF THE FOLLOWING:

On March 24, 2022, Defendant Industrial Fabrics Inc. (the “Defendant”), filed *Industrial Fabrics, Inc.’s Motion for Summary Judgment* [Adv. D.I. 39] (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. Industrial Fabrics, Inc.’s Motion for Summary Judgment [Adv. D.I. 39; filed March 24, 2022];
2. Memorandum of Law in Support of Industrial Fabrics, Inc.’s Motion for Summary Judgment [Adv. D.I. 40; filed March 24, 2022];
3. Plaintiff’s Response in Opposition to Defendant’s Motion for Summary Judgment [Adv. D.I. 47; filed May 9, 2022];
4. Plaintiff’s Motion to File Under Seal Plaintiff’s Response in Opposition to Defendant’s Motion for Summary Judgment [Adv. D.I. 49; filed May 12, 2022];

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<sup>1</sup> 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)



5. Notice of Filing of Proposed Redacted Version of Plaintiff's Response in Opposition to Defendant's Motion for Summary Judgment [Adv. D.I. 50; filed May 12, 2022];
6. Application for Oral Argument Regarding Parties' Competing Motions for Summary Judgment [Adv. D.I. 56; filed May 23, 2022];
7. Reply to the Plaintiffs Response to Defendants Motion for Summary Judgment [Adv. D.I. 59; filed May 26, 2022];
8. Motion to File Under Seal Defendants Reply to the Plaintiffs Response to Defendants Motion for Summary Judgment and to Consider the Reply as Timely Filed. [Adv. D.I. 62; filed May 27, 2022];
9. Notice of Filing of Proposed Redacted Version of Document Notice of Filing of Proposed Redacted Version of Defendants Reply to the Plaintiffs Response to Defendants Motion for Summary Judgment [Adv. D.I. 63; filed May 27, 2022].

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

Dated: June 3, 2022

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

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Welded Construction, L.P.,	
<i>Plaintiff,</i>	
vs.	
Industrial Fabrics, Inc.,	Adversary Proceeding No. 20-50932-CSS
<i>Defendant.</i>	

**CERTIFICATE OF SERVICE**

I, James Tobia, hereby certify that on June 3, 2022, I caused the foregoing NOTICE OF COMPLETION OF BRIEFING REGARDING DEFENDANT INDUSTRIAL FABRICS, INC.'S MOTION FOR SUMMARY JUDGMENT [ADV. DOCKET NO. 39] to be served upon Plaintiff's counsel by CM/ECF:

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Dated: June 3, 2022

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