

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
Met-Coil Systems Corporation,)	Case No. 03-12676 (MFW)
)	
Debtor.)	

**DEBTOR'S MOTION TO SHORTEN NOTICE PERIOD REGARDING
DEBTOR'S EMERGENCY MOTION FOR INTERIM RELIEF WITH
RESPECT TO DEBTOR'S APPLICATION FOR ENTRY OF ORDER
AUTHORIZING DEBTOR TO EMPLOY AND COMPENSATE
PROFESSIONALS FOR SERVICES RENDERED IN THE ORDINARY
COURSE OF BUSINESS [RE: D.I. 11 & 50]**

Met-Coil Systems Corporation, debtor and debtor in possession (the "Debtor" or "Met-Coil") in the above-captioned Chapter 11 case (the "Case"), hereby moves this Court for entry of an order, pursuant to rules 2002 and 9006 of the Federal Rules of Bankruptcy Procedure, and Rule 9006-1 of the Local Rules of Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, shortening notice with respect to the **Debtor's Emergency Motion For Interim Relief With Respect To Debtor's Application For Entry Of Order Authorizing Debtor To Employ And Compensate Professionals For Services Rendered In The Ordinary Course Of Business** (the "Emergency Motion") and, in support thereof, respectfully represents as follows:

1. On August 26, 2003, the Debtor filed the Debtor's Application For Entry Of Order Authorizing Debtor To Employ And Compensate Professionals For Services Rendered In The Ordinary Course Of Business (D.I. 11) (the "Application"). Pursuant to the Application, the Debtor seeks the entry of an Order authorizing the Debtor to employ and compensate professionals for services rendered in the ordinary course of business.

Date Filed 9/1/03
Docket No. 100

2. A hearing to consider, inter alia, the Application was held on August 28, 2003, at which time the Court approved the Application subject to certain agreed upon changes in the form of the Order.

3. On August 29, 2003, the Court entered the Interim Order Authorizing Debtor To Employ And Compensate Professionals For Services Rendered In The Ordinary Course Of Business (D.I. 50) (the "**Interim Order**"). The Interim Order permitted the Debtor to retain certain identified professionals but required that the remainder of the relief requested in the Application be noticed for a future hearing.

4. BANDZA Construction ("**Bandza**") and Thermal Remediation Services ("**Thermal**") are both environmental consultants that assist the Debtor with the investigation and remediation of environmental contamination at the Lockformer site. Although Bandza and Thermal were identified on Exhibit A to the Application, the Debtor did not request that Bandza and Thermal be identified on the Interim Order, and Bandza and Thermal are not identified on the Interim Order.

5. On September 4, 2003, the Debtor served the Application and the Interim Order on the general service list being maintained in the Debtor's chapter 11 case.

6. On September 19, 2003, the Debtor filed a Notice of Final Hearing On Debtor's Application For Entry Of Order Authorizing Debtor To Employ And Compensate Professionals For Services Rendered In The Ordinary Course Of Business (D.I. 99), which provides that the final hearing on the Application, if necessary, shall take place on October 20, 2003 at 3:00 p.m. (Eastern).

Relief Requested

7. The Debtor requests, by this Motion, that the Court exercise its discretion to enter an order (a) shortening the notice period normally required by Local Rule

9006-1 so that the Debtor's request for relief with respect to the Emergency Motion may be heard at the next regularly scheduled omnibus hearing date of **September 23, 2003 at 12:00 p.m. (Eastern Time)** and (b) establishing an objection deadline with respect to the Emergency Motion of **September 23, 2003 at 12:00 p.m. (Eastern Time)**.

Basis For Relief

8. Pursuant to the Emergency Motion the Debtor is seeking the entry of a second interim order (the "**Second Interim Order**") approving the Application with respect to Bandza and Thermal on an interim basis.

9. As more fully described in the Emergency Motion, the remediation services performed by Bandza and Thermal are vital to the Debtor's remediation efforts at the Lockformer site.

10. The Debtor submits that the relief requested in the Emergency Motion is extremely time sensitive because without the relief requested therein, Bandza and Thermal may not continue to perform vital remediation services.

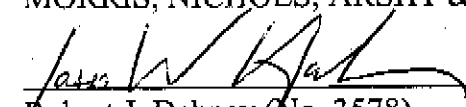
11. The Debtor further submits that shortening the notice period, as requested herein, will not prejudice any party in interest. The relief requested in the Emergency Motion only provides for interim relief with respect to Bandza and Thermal. Parties in interest will continue to have an opportunity to object to the retention of Bandza and Thermal under the procedures contemplated in the Second Interim Order. Additionally, the Debtor is continuing to attempt to discuss the relief requested with the Office of the United States Trustee and counsel to the Committee.

12. Accordingly, ample cause exists for the Court to exercise its discretion to enter an order shortening the notice period and fixing the objection deadline as requested herein.

WHEREFORE, the Debtor respectfully requests that the Court enter an order approving the form, manner, sufficiency and shortening of the notice of the Emergency Motion as contemplated hereby such that a hearing on the Motion may be convened **September 23, 2003 at 12:00 p.m. (Eastern Time)**, with objections, if any, to be filed and served on the undersigned counsel for the Debtor by no later than **September 23, 2003 at 12:00 p.m. (Eastern Time)**.

Dated: September 19, 2003
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL


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Debtor-in-Possession

Dated: Wilmington, Delaware
Sept. 23, 2003


THE HONORABLE MARY F. WALRATH
UNITED STATES BANKRUPTCY JUDGE