

**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 WITH RESPECT TO
DEBTOR’S MOTION TO ASSUME CERTAIN EXECUTORY CONTRACTS AND
CURE EXISTING DEFAULTS**

Debtor and debtor-in-possession Met-Coil Systems Corporation (the “Debtor”), by and through its undersigned counsel, hereby moves this Court for the entry of an order, pursuant to Rules 2002 and 9006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 9006-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), shortening notice with respect to the Debtor’s Motion To Assume Certain Executory Contracts And Cure Existing Defaults (the “Motion”), and in support hereof, respectfully states as follows:

Relief Requested

1. By this motion, the Debtor requests that the Court enter an order shortening the notice period normally required by Local Rule 9006-1 to twelve (12) days so that the Motion may be heard at the existing omnibus hearing date of **October 20, 2003 at 3:00 p.m. ET** (the “Hearing”).

Basis for Relief

2. In the Motion, the Debtor seeks entry of an order, under section 365(a) of title 11 of the United States Code (as amended, the “Bankruptcy Code”), authorizing the Debtor to assume two executory contracts (the “Contracts”): one with Thermal Remediation Services, Inc. (the “TRS Agreement”), and one with Logosol, Inc. (the “Logosol Agreement”). Shortening the required notice in this instance will not cause material prejudice to any party in interest. Further, a recent

emergency has prevented the Debtor from filing the Motion in accordance with the notice requirements of Local Rule 9006-1 in order for the Motion to be heard at the Hearing.

3. As more fully described in the Motion, the Debtor has concluded, in the exercise of its business judgment, that the assumption of the Contracts will maximize the value of the Debtor's estate for the benefit of all of its creditor constituencies.

4. The Debtor's delay in filing the Motion is justified by recent emergency circumstances. The Debtor, its employees and professionals have worked diligently throughout this case to determine which executory contracts the Debtor should assume and which should be rejected.

Charles F. Kuoni, who is President and Chief Executive Officer of the Debtor is integral to this process. Mr. Kuoni's approval of the Motion was required before the Motion could be filed. During the week of September 29, 2003, a member of Mr. Kuoni's family was involved in a tragic traffic accident. These circumstances, of course, required Mr. Kuoni's presence with his family and made him unavailable to approve the Motion so that the Motion could be filed in accordance with the Notice requirements of Local Rule 9006-1 and Bankruptcy Rule 2002 in order for the Motion to be heard at the Hearing.

5. As a result, the Debtor believes that sufficient cause exists and that it is in the best interests of its estate and creditors to shorten the normal twenty-day notice period to twelve (12) days so that the Court may consider the Motion at the Hearing. Additionally, by agreeing to move the response deadline from October 10, 2003 to October 15, 2003, the Debtor has attempted to ensure that parties in interest will have adequate time within which to respond to the Motion.

6. Thus, there is no likelihood of material prejudice to creditors and parties-in-interest if the Court grants the relief requested herein. The Debtor has caused the Motion to be served via hand delivery or overnight courier upon (a) the United States Trustee, (b) counsel to the

Creditors' Committee, (c) counsel to the Debtor's prepetition and postpetition lenders, (d) TRS and Logosol, and (e) all those that have requested notice of pleadings pursuant to Bankruptcy Rule 2002.

WHEREFORE, the Debtor respectfully requests that the Court (i) enter an order approving the form, manner, sufficiency and shortening of the notice of the Motion as contemplated hereby such that a hearing on the Motion may be convened on October 20, 2003 at 3:00 p.m. ET, with objections, if any, to be filed and served on the undersigned co-counsel for the Debtor no later than October 15, 2003 at 4:00 p.m. ET; and (ii) grant such other and further relief as the Court deems just and proper.

Dated: October 8, 2003

MORRIS, NICHOLS, ARSHT & TUNNELL



Robert J. Dehney (No. 3578)
Eric D. Schwartz (No. 3134)
Jason W. Harbour (No. 4176)
James C. Carignan (No. 4230)
1201 North Market Street
P.O. Box 1347
Wilmington, Delaware 19899-1347
(302) 658-9200

- and -

GOLDBERG KOHN BELL BLACK
ROSENBLUM & MORITZ, LTD.
Ronald Barliant (Illinois ARDC# 0112984)
55 East Monroe Street, Suite 3700
Chicago, Illinois 60603
Telephone: (312) 201-4000
Facsimile: (312) 332-2196

Proposed attorneys for the Debtor and
Debtor-in-Possession