

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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| In re:                        | : | Chapter 11   |
|                               | : |  |
| MET-COIL SYSTEMS CORPORATION, | : | Case No. 03-12676 (MFW)                                    |
|                               | : |  |
| Debtor.                       | : | <b>Objection Deadline: November 14, 2003 at 12:00 p.m.</b> |
|                               | : |  |
|                               | : | <b>Hearing Date: November 18, 2003 at 12:30 p.m.</b>       |
|                               | : |  |

**MOTION TO SHORTEN TIME AND LIMIT NOTICE OF  
APPLICATION FOR AN ORDER PURSUANT TO SECTIONS 1103(a)  
AND 328(a) OF THE BANKRUPTCY CODE AUTHORIZING AND APPROVING  
THE EMPLOYMENT AND RETENTION OF BEDERSON & CO. LLP, AS SPECIAL  
ENVIRONMENTAL FINANCIAL CONSULTANTS TO THE OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS NUNC PRO TUNC TO OCTOBER 9, 2003**

The Official Committee of Unsecured Creditors (the “Committee”) of Met-Coil Systems Corporation (“Met-Coil” or the “Debtor”) by and through their undersigned counsel, hereby moves (the “Motion”) this Court, pursuant to Rules 2002, 4001, 6004, and 9006 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”) and 11 U.S.C. §§ 328(a) and 1103(a), for an order providing that the notice period for and service of the attached *Application for an Order Pursuant to Sections 1103(a) and 328(a) of the Bankruptcy Code Authorizing and Approving the Employment and Retention of Bederson & Co. LLP, as Special Environmental Financial Consultants to the Official Committee of Unsecured Creditors Nunc Pro Tunc to October 9, 2003* (the “Application”) be limited to the parties designated below. In support of this Motion, the Committee respectfully represents as follows:

1. By this Motion, the Committee requests the Court to shorten the notice period for the Application to 13 days and limit the parties to be served as set forth below. Delaware Local Bankruptcy Rule requires the Committee to give all creditors and indenture trustees 18 days’

notice by mail of the Application unless the moving party files a motion pursuant to Del.Bankr.L.R. 9006-1(e) requesting the notice period be shortened. The Committee submits there is sufficient cause to justify shortening the 18-day notice period to 13 days and limiting notice to those persons designated below.

2. The next omnibus hearing date is November 18, 2003 at 12:30 p.m. The Committee requires the immediate assistance of Bederson & Co. LLP ("Bederson") to analyze the financial issues surrounding the Debtor's environmental liabilities and their affect on the Debtor being able to confirm a plan of reorganization and make a distribution to unsecured creditors. The Committee also requires Bederson's assistance in evaluating any potential claims or causes of action the estate may have against the Debtor's indirect parent company, Mestek, Inc., said claims or causes of action having to be filed by January 9, 2004.

3. Upon information and belief, the Debtors are on a timetable to file a plan of reorganization by November 5, 2003 with a confirmation hearing to held January 20, 2004. Given the expedited schedule of this case, it would prejudice the Committee to have to wait until next omnibus hearing date of December 10, 2003, to retain its consultant.

4. In addition to shortening the time to respond to the Application, the Committee also believes that cause exists to limit notice of the Application. Providing notice of the Application to all creditors in this bankruptcy case would require a mailing to hundreds of addresses, causing the Committee to incur a significant and unnecessary expense. Instead, the Committee proposes to serve notice and a copy of the Application only upon (i) Counsel to the Debtor (by hand delivery or FedEx), (ii) the United States Trustee (by hand), (iii) Counsel to Mestek, Inc. (by hand delivery or FedEx), (iv) all parties that have expressed a bona fide interest in acquiring the Highgreen Assets (by first class mail), and (v) all parties that have filed requests

for notices in these cases pursuant to Bankruptcy Rule 2002 (by first class mail). Such notice is designed to timely advise the major creditor constituencies and those persons most interested in the relief requested in the Application. Accordingly, the Committee believes that such limited notice is adequate and sufficient for entry of an order on the Application.

5. Finally, the Committee requests the Court's approval for setting forth a deadline for filing objections to the Application of November 14, 2003 at 12:00 p.m., EST. The Committee submits that such form of notice is proper under 11 U.S.C. § 102 and Bankruptcy Rule 2002(m).

WHEREFORE, the Committee respectfully requests the entry of an Order shortening time and limiting notice of the Application as described above and granting such other and further relief as may be just and proper.

Dated: November 4, 2003

KLEHR, HARRISON, HARVEY, BRANZBURG  
& ELLERS, LLP

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Counsel to the Official Committee of  
Unsecured Creditors

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2003.

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Honorable Mary F. Walrath  
Chief United States Bankruptcy Judge