

**EXHIBIT D**

**ADMINISTRATIVE BAR DATE ORDER**

**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.	)	

**ORDER (I) ESTABLISHING ADMINISTRATIVE BAR DATE FOR FILING  
REQUESTS FOR PAYMENT OF ADMINISTRATIVE EXPENSES, (II)  
APPROVING REQUEST FOR PAYMENT FORM, (III) APPROVING BAR  
DATE NOTICE, (IV) APPROVING MAILING AND PUBLICATION  
PROCEDURES AND (V) PROVIDING CERTAIN SUPPLEMENTAL RELIEF**

Upon the motion dated November 21, 2003 (the "Motion")<sup>1</sup> of Met-Coil Systems Corporation, the above-captioned debtor and debtor-in-possession (the "Debtor"), pursuant to section 503 of title 11 of the United States Code (the "Bankruptcy Code"), Rules 2002 and 3003(c)(3) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rules 2002-1(e) and 3003-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), for the entry of an order (i) establishing the Administrative Bar Date by which requests for payment of certain Administrative Expenses must be filed, (ii) approving a Request for Payment Form to be distributed, (iii) approving the form of notice to be used with respect to Administrative Bar Date, (iv) approving mailing and publication procedures with respect to notice of the Administrative Bar Date; and (v) providing certain supplemental relief; and it appearing that the relief requested in the motion is in the best interest of the

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings ascribed to them in the Motion.

Debtor, its estate and its creditors, that the establishment of the Administrative Bar Date and the procedures set forth in the Motion are fair and reasonable and will provide good, sufficient and proper notice to all applicable persons of their rights and obligations in connection with Administrative Expenses that they may have against the Debtor or its property in this chapter 11 case; and the Court finding that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and notice of this Motion having been due and sufficient under the circumstances; and upon the record herein; and after due deliberation thereon; and good and sufficient cause appearing therefore,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. Except as otherwise provided herein, each person or entity (including, without limitation, each individual, partnership, joint venture, corporation, estate and trust but excluding governmental units) that asserts an Administrative Expense against the Debtor that accrued between the Petition Date and the Effective Date is required to file an original, written request for payment of any such Administrative Expense substantially in the form of the Request for Payment Form so as to be received on or before the Administrative Bar Date (the 45<sup>th</sup> day after notice of the Effective Date is mailed to the Administrative Bar Date Notice Parties) by mail or delivery by hand, courier or overnight service at the appropriate address for the Claims Docketing Center.
3. For purposes of this Order, the term "Administrative Expense" shall include any claim (as defined in section 101(5) of the Bankruptcy Code) against the Debtor asserting any right to payment constituting a cost or expense of administration under

§§ 503(b) and 507(a)(1) of the Bankruptcy Code. That a particular claim constitutes an Administrative Expense for purposes of this Order shall not be deemed an admission or finding that such claim is entitled to priority of payment or distribution from the Debtor's estate under §§ 365(d)(3), 365(d)(10), 503(b), 507(a)(1) and/or any other provision of the Bankruptcy Code.

4. Persons and entities holding or asserting the following types of Administrative Expenses against the Debtor are not required to file a request for payment:

- (a) Any Administrative Expense in respect of which the claimant has already filed a formal request for payment with this Court;
- (b) Any Administrative Expense of a person or professional retained or employed by the Debtor or the Committee pursuant to an Order of this Court for compensation and reimbursement of expenses pursuant to §§ 327, 328, 330 or 331 of the Bankruptcy Code;
- (c) Any Administrative Expense that has been fixed and allowed by Order of this Court;
- (d) Any Administrative Expense of the Office of the United States Trustee in respect of claims that arise in connection with fees due under 28 U.S.C. § 1930; and
- (e) Any right to payment or performance arising from §§ 365(d)(2), 365(d)(3) or 365(d)(10) with respect to executory contracts or unexpired leases (as these claims are addressed and handled through the Plan).

5. A request for payment in respect of an Administrative Expense shall be deemed timely filed only if the original request for payment is mailed or delivered by hand, courier or overnight service so as to be actually received by the Claims Docketing Center on or before the Administrative Bar Date. The Claims Docketing Center shall not accept requests for payment sent by facsimile, telecopy or other electronic means.

6. To be properly filed pursuant to this Order, each request for payment shall (a) be written in the English language, (b) be denominated in lawful currency of the United States, (c) conform substantially with the Request for Payment Form and (d) attach copies of any writings upon which the Administrative Expense is based.

7. Any holder of a claim against the Debtor, who is required, but fails, to file a Request for Payment in respect of such Administrative Expense in accordance with the Administrative Bar Date Order on or before the Administrative Bar Date, shall be forever barred, estopped and enjoined from asserting such claim against the Debtor (or filing a request for payment with respect thereto); the Debtor and its property shall be forever discharged from any and all indebtedness or liability with respect to such Administrative Expense; and the holder of such Administrative Expense shall not be permitted to participate in any distribution in this Chapter 11 Case on account of such Administrative Expense or to receive further notices regarding such Administrative Expense.

8. Notice of the entry of this Order and the Administrative Bar Date, substantially in the form of the notice annexed as Exhibit B to the Motion, which Notice is hereby approved in all respects, shall be deemed good, adequate and sufficient notice if it is served by being deposited in the United States mail, first class postage prepaid, on or before the date that is one week after the Effective Date, upon:

- (a) The United States Trustee;
- (b) Each member of the Committee and the attorneys for the Committee;
- (c) The District Director of Internal Revenue for the District of Delaware and all taxing authorities in which the Debtor does business;

- (d) The Securities and Exchange Commission;
- (e) All persons and entities requesting notice pursuant to Bankruptcy Rule 2002 as of the entry of the Bar Date Order;
- (f) All counsel of record on behalf of the Debtor, including the Bankruptcy professionals.
- (g) All persons or entities who either (i) are listed on the Debtor's Schedules as having claims against the Debtor that are not disputed, contingent or unliquidated or (ii) filed a proof of claim against the Debtor which has not been disallowed by a final order of the Bankruptcy Court on or prior to the Effective Date; and
- (h) To the extent determinable, all persons who provided services or other values to the Debtor outside the ordinary course of the Debtor's business.

9. So long as the initial mailing of the Notice occurs as provided in Paragraph 8 above, the Debtor may make supplemental mailings of the Notice up to 23 days in advance of the Administrative Bar Date, as may be necessary in situations where (a) notices are returned by the post office with forwarding addresses, necessitating a remailing to the new addresses, (b) certain parties acting on behalf of parties in interest decline to pass along notices to such parties and instead return their names and addresses to the Debtor for direct mailing or (c) additional potential claimants become known to the Debtor.

10. Service of the Notice on Subsequent Mailing Parties shall be handled as follows:

- (a) The Debtor shall (i) provide notice of each special bar date in substantially the form of the Notice (with necessary changes to reflect the special bar date provisions) and (ii) mail such notice no later than 23 days in advance of the special bar date specified in the notice;
- (b) The Debtor shall (i) advise this Court of the establishment of each special bar date by filing a notice thereof, to which shall be

attached a list that specifically identifies the Subsequent Mailing Parties that are subject thereto and a copy of the bar date notice applicable to the special bar date and (ii) serve such notice and attachments upon counsel for the United States Trustee and the Committee;

- (c) The Debtor shall evidence the mailing of each special bar date notice to the Subsequent Mailing Parties subject thereto by filing a certificate of service with respect thereto; and
- (d) Each of the special bar dates shall apply only to the Subsequent Mailing Parties who are specifically identified as being subject thereto in the lists to be filed with this Court. However, as to any of such specifically identified parties who may be found to have received effective notice of the Administrative Bar Date, the Debtor does not waive the right to assert that the Administrative Bar Date, rather than the special bar date, governs. Moreover, the Administrative Bar Date will remain effective, and it is the Debtor's intention that it be fully enforceable both with respect to known parties who have received actual notice thereof pursuant to the Notice and with respect to unknown parties who are deemed to have received constructive notice thereof pursuant to the Publication Notice.

11. The Debtor is authorized to publish notice of the Administrative Bar Date once in each of the Wall Street Journal (national edition), the Chicago Tribune, the Chicago Sun Times and the local community newspapers in Lisle, Illinois and Cedar Rapids, Iowa, in substantially the form of notice attached to the Motion as Exhibit C, which is approved in all respects. Such publication notice must be made as soon as reasonably practicable after entry of the Administrative Bar Date Order but in no event later than 20 days prior to the Administrative Bar Date.

12. The foregoing publication notice is hereby approved in all respects and is deemed good and sufficient notice of the Administrative Bar Date upon (a) those claimants whom no other notice was sent and who are unknown or not reasonably ascertainable by the

Debtor; (b) known claimants with addresses unknown to the Debtor; and (c) claimants with potential administrative expenses unknown to the Debtor.

13. Bankruptcy Management Corporation ("BMC") is authorized to retain and pay necessary service providers, subject to prior approval from the Debtor, and to obtain reimbursement from the Debtor for any such payments on the same terms applicable to its direct services.

14. The Debtor and BMC are authorized and empowered to take such steps and perform such actions as may be necessary to implement and effectuate the terms of this Order, including payment of costs incurred in connection with the Administrative Bar Date noticing process.

15. Notification of the Administrative Bar Date as provided herein is fair and reasonable and will provide good, sufficient and proper notice to applicable persons of their rights and obligations in connection with any Administrative Expenses they may have against the Debtor in this chapter 11 case.

16. The Debtor shall retain the right to: (a) dispute, or assert offsets or defenses, against any Administrative Expense; and (b) object to any Administrative Expense, on any grounds.

17. Upon the advance express written consent of the Debtor, a request for payment may be filed without the writings upon which the Administrative Expense is based, as required by Bankruptcy Rules 3001(c) and (d) and this Order; provided, however, that, upon the request of the Debtor or any other party in interest in this case, any person that receives such written consent shall be required to transmit promptly such writings to the



Debtor and the party in interest making such request as soon as reasonably practicable, but in no event later than ten (10) days from the date of such request.

18. This Court shall retain jurisdiction over all matters arising out of or related to the Motion and this Order.

Dated: Wilmington, Delaware  
\_\_\_\_\_, 2003

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UNITED STATES BANKRUPTCY JUDGE