

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

In re:)	Chapter 11
)	
MET-COIL SYSTEMS CORPORATION,)	Case No. 03-12676
)	
Debtor.)	
_____)	

AFFIDAVIT OF SUPPLEMENTAL SERVICE RE [DOCKET 327]:

- 1. NOTICE OF SECOND OMNIBUS OBJECTION (SUBSTANTIVE) TO CERTAIN CLAIMS PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE, RULE 3007 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND RULE 3007-1 OF THE LOCAL RULES OF BANKRUPTCY PROCEDURE**
- 2. DEBTORS' SECOND OMNIBUS OBJECTION (SUBSTANTIVE) TO CERTAIN CLAIMS PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE, RULE 3007 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND RULE 3007-01 OF THE LOCAL RULES OF BANKRUPTCY PROCEDURE**

I, Yvette Hassman, state as follows:

1. I am over eighteen years of age and I believe the statements contained herein are true based on my personal knowledge. My business address is c/o Bankruptcy Management Corporation, 1330 East Franklin Avenue, El Segundo, California 90245.

2. On January 13, 2004, at the direction of Goldberg, Kohn, Bell, Black, Rosenbloom & Moritz, LTD, co-counsel to the debtor, I caused service of the documents attached hereto as Exhibit 1 to be effected on the party listed in Exhibit 2.

///

EXHIBIT 1

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

In re:)	
)	Chapter 11
)	
Met-Coil Systems Corporation,)	Case No. 03-12676 (MFW)
)	Obj. Deadline: Jan. 13, 2004 @ 4:00 p.m. ET
Debtor.)	Hearing Date: Jan. 20, 2004 @ 10:30 a.m. ET

**NOTICE OF SECOND OMNIBUS OBJECTION (SUBSTANTIVE) TO CERTAIN
CLAIMS PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE, RULE 3007
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND RULE 3007-1 OF
THE LOCAL RULES OF BANKRUPTCY PROCEDURE**

TO: ALL ENTITIES IDENTIFIED ON THE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that the above-captioned debtor and debtor-in-possession (the "Debtor") has filed the attached Debtor's Second Omnibus Objection (Substantive) To Certain Claims Pursuant To Section 502 Of The Bankruptcy Code, Rule 3007 Of The Federal Rules Of Bankruptcy Procedure And Rule 3007-1 Of The Local Rules Of Bankruptcy Procedure (the "Omnibus Objection") which seeks to alter your rights by disallowing, reducing and/or recharacterizing your claim.

Responses ("Responses") to the Omnibus Objection must be filed with the United States Bankruptcy Court for the District of Delaware, Office of the Clerk, 824 Market Street, 5th Floor, Wilmington, Delaware 19801 on or before January 13, 2004 at 4:00 p.m. ET (the "Response Deadline"). Any Responses must also be served upon the undersigned counsel for the Debtor on or before the Response Deadline.

A HEARING ON THE OMNIBUS OBJECTION WILL TAKE PLACE BEFORE THE HONORABLE MARY F. WALRATH, CHIEF UNITED STATES BANKRUPTCY JUDGE AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE ON **JANUARY 20, 2004 AT 10:30 P.M. ET.** IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: December 5, 2003

MORRIS, NICHOLS, ARSHT & TUNNELL



Robert J. Dehney (No. 3578)
Eric D. Schwartz (No. 3134)
Donna L. Harris (No. 3740)
Jason W. Harbour (No. 4176)
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1201 North Market Street
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Wilmington, Delaware 19899-1347
(302) 658-9200

- and -

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

Attorneys for the Debtor and Debtor-in-Possession

**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.)	
)	
) Objections Due: Jan. 13, 2004 at 4:00 p.m. (Eastern Time)
) Hearing Date: Jan. 20, 2004 at 10:30 a.m. (Eastern Time)

**DEBTOR'S SECOND OMNIBUS OBJECTION (SUBSTANTIVE) TO CERTAIN
CLAIMS PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE,
RULE 3007 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND
RULE 3007-1 OF THE LOCAL RULES OF BANKRUPTCY PROCEDURE**

Met-Coil Systems Corporation, debtor and debtor-in-possession in the above-referenced bankruptcy case (the "Debtor"), pursuant to § 502 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Local Rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), hereby objects (the "Objection") to each of the claims filed in the above-captioned case and listed on Exhibits A through E, attached hereto and incorporated herein by reference (collectively, the "Claims"). In support of this Objection, the Debtor submits the Declaration of Charles F. Kuoni, III, attached hereto as Exhibit F and incorporated herein by reference, and respectfully states as follows:

JURISDICTION

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of the Debtor's Chapter 11 case and this Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought herein are § 502 of the Bankruptcy Code,

Bankruptcy Rule 3007 and Local Rule 3007-1.

BACKGROUND

2. On August 26, 2003 (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the District of Delaware (the "Court").

3. On September 11, 2003, the United States Trustee appointed an official committee of unsecured creditors (the "Committee") in this case.

4. By order dated September 23, 2003 (D.I. 119), this Court established November 14, 2003, as the deadline for non-governmental entities to file claims against the Debtor's estate (subject to supplemental mailings as provided for therein) and February 23, 2003, as the bar date for governmental entities to file claims against the Debtor's estate (the "Bar Date").

5. On or about August 29, 2003, the Court entered an Order (D.I. 52) authorizing the Debtor to retain Bankruptcy Management Corporation ("BMC") as the claims, noticing and balloting agent in this case. Since its appointment, BMC has assisted the Debtor and its counsel with sending notices and bar date packages to creditors, providing national and local publication notice and maintaining the official claims register in the Debtor's case.

6. Each of the claimants listed on Exhibits A through E (collectively, the "Claimants") has filed one or more proofs of claim against the Debtor's estate.

7. The Debtor has reviewed the official register of claims filed in the Debtor's case. For the reasons set forth below, the Debtor has determined that each of the Claims listed on Exhibits A through E is properly the subject of an objection on one or more grounds.

8. Compliance with Local Rule 3007-1. The Debtor has reviewed Local

Rule 3007-1 and hereby states that, to the best of its knowledge and belief, this Objection is in compliance therewith.

RELIEF REQUESTED

9. For the reasons set forth below, the Debtor objects to each of the Claims listed on Exhibits A through E, attached hereto and incorporated herein by reference. By this Objection, the Debtor respectfully requests that the Court enter an Order pursuant to Bankruptcy Code § 502(b), Bankruptcy Rule 3007 and Local Rule 3007-1 reducing, reclassifying, fixing, disallowing and/or expunging the Claims listed on Exhibits A through E, as described below.

A. Claims Miscategorized as Priority – Exhibit A

10. The Debtor objects to each of the Claims identified on the attached Exhibit A (the "Non-Priority Claims") and respectfully submits that they be reclassified as non-priority, general unsecured claims. The Non-Priority Claims set forth on Exhibit A hereto request priority status under 11 U.S.C. § 507. Upon review of the Non-Priority Claims, there appears to be no legitimate basis for any claim of priority status.

11. Therefore, for all of the foregoing reasons, each of the Non-Priority Claims should be reclassified as a non-priority, general unsecured claim.

B. Unsubstantiated Claims - Exhibit B

12. The Debtor objects to each of the Claims listed on Exhibit B attached hereto (the "Unsubstantiated Claims") and respectfully submits that each of the Unsubstantiated Claims should be disallowed in full and expunged. The Debtor has reviewed each of the Unsubstantiated Claims and has found that the documentation attached to each of the Unsubstantiated Claims does not support the liability asserted on each of the Unsubstantiated Claims. Further, the Debtor has reviewed its books and records with regard to each of the

Claimants asserting an Unsubstantiated Claim, and has been unable to determine the basis for the Unsubstantiated Claims.

13. Therefore, for the foregoing reasons, each of the Unsubstantiated Claims identified on Exhibit B should be disallowed in full and expunged.

C. Contingent/Unliquidated Claims- Exhibit C

14. The Debtor objects to each of the Claims listed on Exhibit C attached hereto (the "Contingent/Unliquidated Claims") and respectfully submits that each of the Contingent/Unliquidated Claims should be disallowed in full and expunged. The Contingent Claims are contingent claims for contribution or indemnification for which the Claimants, if the Claims were true, would be liable with the Debtor. Accordingly, the Contribution Claims should be expunged pursuant to § 502(e)(1)(B).

15. Section 502(e)(1)(B) of the Bankruptcy Code provides, in pertinent part:

(e)(1) Notwithstanding subsections (a), (b) and (c) of this section and paragraph (2) of this subsection, the court shall disallow any claim for reimbursement or contribution of an entity that is liable with the debtor on or has secured the claim of a creditor, to extent that -

(B) such claim for reimbursement or contribution is contingent as of the time of allowance or disallowance of such claim for reimbursement or contribution...

11 U.S.C. § 502(e)(1)(B). A claim must be disallowed under § 502(e)(1)(B) if three criteria are satisfied: first, the claim must be contingent; second, the claim must be for contribution or reimbursement; and third, the claimant must be co-liable with the debtor with respect to the claim. In re Pinnacle Brands, Inc., 259 B.R. 46, 55 (Bankr. D. Del. 2001) (Walrath J.) (citing In re Dant & Russell, Inc., 951 F.2d. 246, 248 (9th Cir. 1991)). The legislative history behind § 502 states that the section: "requires disallowance of the claim for reimbursement or contribution of a co-debtor, surety or guarantor of an obligation of the debtor, unless the claim of the creditor on

such obligation has been paid in full." H.R. Rep. No. 95-595, 1st. Sess. at 353-355 (1977), U.S. Code Cong. & Admin. News 1978, pp. 6308-6311.

16. On their face all of the Contingent Claims satisfy all three criteria. They are claims for contribution or indemnification, and the Debtor's liability is contingent on the Claimants' satisfaction of their own liability on claims for which the Debtor is also liable. None of the Claimants has satisfied any such liability.

17. Therefore, for the foregoing reasons, each of the Contingent/Unliquidated Claims identified on Exhibit C should be disallowed in full and expunged.

D. No Liability- Exhibit D

18. The Debtor objects to each of the Claims listed on Exhibit D attached hereto (the "No Liability Claims") and respectfully submits that each of the No Liability Claims should be disallowed in full and expunged. The Debtor has reviewed its books and records with regard to each of the Claimants asserting a No Liability Claim, and has been unable to determine any basis for liability of such claims or otherwise disputes each Claimants' assertion of liability for such claims.

19. Therefore, for the foregoing reasons, each of the No Liability Claims identified on Exhibit D should be disallowed in full and expunged.

E. Executory Contract Claims - Exhibit E

20. The Debtor objects to each of the Claims listed on Exhibit E attached hereto (the "Executory Contract Claims") and respectfully submits that each of the Executory Contract Claims should be disallowed in full and expunged. At this time, the Debtor has not determined whether the executory contracts underlying the Executory Contract Claims should be assumed or rejected, and accordingly no claim exists at this time. Upon determining whether to

assume or reject each executory contract, the Debtor intends to send to the respective claimant a notice of assumption and cure amount or a notice of rejection. If the Debtor rejects an executory contract, the Claimant who is the counterparty to that contract will then have an opportunity to file a proof of claim against the Debtor.

21. Therefore, for the foregoing reasons, each of the Executory Contract Claims identified on Exhibit E should be disallowed in full and expunged.

RESERVATION OF RIGHTS

22. In this Objection, the Debtor has raised a number of objections to the Claims filed against it in this Chapter 11 case. By definition of Local Rule 3007-1, objections contained herein are substantive objections. By this reservation, the Debtor seeks to reserve the right to amend, modify or supplement this Objection, and to file additional substantive or non-substantive objections, to each of the Claims, including, without limitation, objections as to the amount, priority, validity, timeliness or proper filing of the Claims, or any other claims (filed or not) against the Debtor. Moreover, should one or more of the grounds of objection stated in this Objection be dismissed or overruled, the Debtor reserves the right to object to each of the Claims on any other grounds that the Debtor elects to pursue.

NOTICE

23. Notice of this Objection has been given to the Office of the United States Trustee, the Committee, the post-petition lender, each of the parties listed on Exhibits A through E, and all other parties that requested notice pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure. In light of the nature of the relief requested, the Debtor submits that no further notice need be given.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order substantially in the form attached hereto as Exhibit G (i) reducing, reclassifying, fixing, disallowing and/or expunging the Claims listed on Exhibits A through E, and (ii) granting such other and further relief as is just and proper.

Dated: Wilmington, Delaware
December 5, 2003

GOLDBERG, KOHN, BELL, BLACK,
ROSENBLUM & MORITZ, LTD.

/s/ Ronald Barliant

Ronald Barliant (Illinois ARDC #0112984)
Kathryn A. Pamenter (Illinois ARDC #6231191)
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Counsel for Met-Coil Systems Corporation,
Debtor and Debtor-in-Possession

EXHIBIT A

CLAIMS MISCATEGORIZED AS PRIORITY

In re: Met-Coil Systems Corporation
OMNIBUS 2: EXHIBIT A - MISCATEGORIZED AS PRIORITY CLAIMS

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars	Claim Class*	Proposed Allowed Amt	Claim Class* Modification	Reason For Proposed Modification
1	AFFILIATED CONTROL EQUIPMENT CO INC 650 WHEAT LN WOOD DALE IL 60191-1109	03-12676	160	\$23,014.51	(P)	\$23,014.51	(U)	RECLASSIFY FROM UNSECURED PRIORITY TO UNSECURED NONPRIORITY
2	AIR FASTENING SYSTEMS INC 1611 EMILY LN AURORA IL 60504-7801	03-12676	128	\$174.04 \$174.04	(P) (U)	\$0.00 \$174.04	(P) (U)	REDUCE PRIORITY TO \$0, NO BASIS FOR PRIORITY CLAIM; INVOICES ATTACHED TO PROOF OF CLAIM ARE ALL PRE-PETITION.
3	CUSTOM HOSE 805 66TH AVE SW CEDAR RAPIDS IA 52404-4708	03-12676	71	\$110.26 BLANK \$110.26	(S) (P) (U)	\$0.00 \$0.00 \$110.26	(S) (P) (U)	REDUCE SECURED AND PRIORITY TO \$0, NO BASIS FOR SECURED OR PRIORITY CLAIMS; INVOICES ATTACHED TO PROOF OF CLAIM ARE PRE-PETITION AND CLAIMANT IS A TRADE VENDOR WITH NO SECURITY INTEREST
4	DURANT TOOL COMPANY 200 CIRCUIT RD NORTH KINGSTOWN RI 02852-7441	03-12676	48	\$7,480.86 \$3,711.72	(P) (U)	\$11,192.38	(U)	RECLASSIFY FROM UNSECURED PRIORITY TO UNSECURED NONPRIORITY, THEN ALLOW.
5	HEEREN COMPANY 513 31ST AVE ROCK ISLAND IL 61201-4000	03-12676	108	\$15,870.70	(P)	\$15,870.70	(U)	RECLASSIFY, SHOULD BE UNSECURED NONPRIORITY
6	NEE CONTROLS INC 1545 HOLLAND RD STE K MAUMEE OH 43537-1691	03-12676	31	\$14,419.59 \$14,419.59	(P) (U)	\$0.00	(P)	REDUCE PRIORITY AMOUNT TO \$0, NO BASIS FOR PRIORITY CLAIM; INVOICES PROVIDED AS EXHIBIT TO PROOF OF CLAIM ARE ALL DATED PRE-PETITION.
7	O & G SPRING & WIRE FORMS SPECIALTY CO 4500 W DIVISION ST CHICAGO IL 60651-1641	03-12676	130	\$857.16 \$857.16	(P) (U)	\$0.00	(P)	REDUCE PRIORITY TO \$0, NO BASIS FOR PRIORITY CLAIM; INVOICES ATTACHED TO PROOF OF CLAIM ARE ALL PRE-PETITION
8	R & R QUALITY CONSTRUCTION CO 1007 28TH ST SE CEDAR RAPIDS IA 52403-3415	03-12676	35	\$4,000.77 \$4,000.77	(P) (U)	\$0.00 \$4,000.77	(P) (U)	REDUCE PRIORITY TO \$0, NO BASIS FOR PRIORITY CLAIM; INVOICE ATTACHED TO PROOF OF CLAIM IS PRE-PETITION

In re: Met-Coll Systems Corporation
OMNIBUS 2: EXHIBIT A - MISCATEGORIZED AS PRIORITY CLAIMS

Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars	Claim Class*	Proposed Allowed Amt	Claim Class* Modification	Reason For Proposed Modification
9 SEW EURODRIVE INC 2001 W MAIN ST TROY OH 45373-1018	03-12676	76	BLANK \$27,569.10	(P) (U)	\$0.00	(P)	REDUCE PRIORITY TO \$0, NO BASIS FOR PRIORITY CLAIM; DOCUMENTS ATTACHED TO PROOF OF CLAIM ARE PRE-PETITION
10 WESTSIDE INDUSTRIAL SUPPLY, WESTSIDE ELECTRIC SUPPLY 1530 N LA FOX ST #31 SOUTH ELGIN IL 60177-1224	03-12676	59	BLANK \$3,514.23	(P) (U)	\$0.00	(P)	REDUCE PRIORITY TO \$0, NO BASIS FOR PRIORITY CLAIM; DOCUMENTS ATTACHED TO PROOF OF CLAIM ARE PRE-PETITION

EXHIBIT B

UNSUBSTANTIATED CLAIMS

**In re: Met-Coil Systems Corporation
OMNIBUS 2: EXHIBIT B - UNSUBSTANTIATED CLAIMS**

	Creditor Name / Address	Case Number	Claim Number	Docketed Claim Date	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
1	GAFFNEY, D 2626 STONEWALL AVE WOODRIDGE IL 60517-1124	03-12676	69	10/13/2003	BLANK	(U)	EXPUNGE
2	OFFERMAN, PAT 5901 KATRINE AVE DOWNERS GROVE IL 60516-1007	03-12676	49	10/10/2003	BLANK	(U)	EXPUNGE
3	PINGEL 6417 MAXWELL DR WOODRIDGE IL 60517-1330	03-12676	107	10/21/2003	BLANK	(U)	EXPUNGE

Totals:

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

****(A)** - Administrative
(P) - Priority

(S) - Secured
(U) - Unsecured

(T) - Total

EXHIBIT C

CONTINGENT/UNLIQUIDATED CLAIMS

EXHIBIT D

NO LIABILITY CLAIMS

**In re: Met-Coil Systems Corporation
OMNIBUS 2: EXHIBIT D - NO LIABILITY CLAIMS**

	Creditor Name / Address	Case Number	Claim Number	Docketed Claim Date	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
1	BECK, DAVID & S&RA 11780 EDEN RD LAWTONS NY 14091	03-12676	125	10/27/2003	BLANK	(U)	EXPUNGE
2	BOURN, HARRY J 8135 KINGSTON AVE LISLE IL 60532-3155	03-12676	260	11/19/2003	\$50,000.00	(U)	EXPUNGE
3	BUKSHOWANY, ANNIE 23 MECHANIC ST BAYONNE NJ 07002-4513	03-12676	141	11/5/2003	\$600.00	(U)	EXPUNGE
4	BUKSHOWANY, MICHAEL 23 MECHANIC ST BAYONNE NJ 07002-4513	03-12676	142	11/5/2003	\$600.00	(U)	EXPUNGE
5	CARMONA, EDEL C/O KERNER & KERNER 74 TRINITY PL NEW YORK NY 10008	03-12676	147	11/5/2003	\$1,250,000.00	(U)	EXPUNGE
6	CLAYTON & LAMBERT MANUFACTURING CO C/O SELLER & HANDMAKER 2200 MEIDINGER TOWER 462 S 4TH ST LOUISVILLE KY 40202-3466	03-12676	77	10/17/2003	\$193,629.00	(U)	EXPUNGE
7	CONNOR MFG CO INC C/O MACKENZIE & PEDEN WILLIAM S BOWMAN, ESQ 7508 NEW LAGRANGE RD #3 LOUISVILLE KY 40222-4895	03-12676	221	11/14/2003	\$152,865.00	(U)	EXPUNGE
8	EHRHART, DENISE ANN C/O BRIAN SHAW & JOHN SHELDON SHAW GUSSIS FISHMAN GLANTZ 321 N CLARK #800 CHICAGO IL 60610	03-12676	196	11/13/2003	\$75,000.00	(U)	EXPUNGE
9	FRANTIK, THOMAS & BARBARA C/O BRIAN SHAW & JOHN SHELDON SHAW GUSSIS FISHMAN GLANTZ 321 N CLARK #800 CHICAGO IL 60610	03-12676	190	11/13/2003	\$2,125,000.00	(U)	EXPUNGE. FINAL PRETRIAL MOTIONS STILL PENDING

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

** (A) - Administrative
(P) - Priority

(S) - Secured
(U) - Unsecured

(T) - Total

**In re: Met-Coil Systems Corporation
OMNIBUS 2: EXHIBIT D - NO LIABILITY CLAIMS**

	Creditor Name / Address	Case Number	Claim Number	Docketed Claim Date	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
10	GARRISON & SWEDENBERG 2719 63RD ST DOWNERS GROVE IL 60516-1663	03-12676	129	10/29/2003	\$300,000.00	(U)	EXPUNGE
11	HALLMER, VIRGINIA C/O BRIAN SHAW & JOHN SHELDON SHAW GUSSIS FISHMAN GLANTZ 321 N CLARK #800 CHICAGO IL 60610	03-12676	197	11/13/2003	\$75,000.00	(U)	EXPUNGE
12	IVANOV, GUENNADI C/O LAWRENCE ROSENBLATT ESQ ROSENBLATT FRASCIELLO & KNIPPING- DIAZ PC 4791 BROADWAY NEW YORK NY 10034	03-12676	168	11/10/2003	\$15,500,000.00	(S)	EXPUNGE
13	IVANOV, LINA C/O LAWRENCE ROSENBLATT ESQ ROSENBLATT FRASCIELLO & KNIPPING- DIAZ PC 4791 BROADWAY NEW YORK NY 10034-4943	03-12676	167	11/10/2003	\$15,500,000.00	(S)	EXPUNGE
14	JEANETTE DEVANE & LEE HERRERA C/O BRIAN SHAW & JOHN SHELDON SHAW GUSSIS FISHMAN GLANTZ 321 N CLARK #800 CHICAGO IL 60610	03-12676	188	11/13/2003	\$2,036,000.00	(U)	EXPUNGE. FINAL PRETRIAL MOTIONS STILL PENDING
15	KENNY, MICHAEL C/O BRIAN SHAW & JOHN SHELDON SHAW GUSSIS FISHMAN GLANTZ 321 N CLARK #800 CHICAGO IL 60610	03-12676	201	11/13/2003	BLANK	(U)	EXPUNGE
16	KUTA, RICHARD & JANE C/O BRIAN SHAW & JOHN SHELDON SHAW GUSSIS FISHMAN GLANTZ 321 N CLARK #800 CHICAGO IL 60610	03-12676	192	11/13/2003	\$2,145,000.00	(U)	EXPUNGE
17	MB FINANCIAL BANK NA ATTN PETER STRAUSS 3232 W PETERSON AVE CHICAGO IL 60659-3622	03-12676	173	11/11/2003	\$5,512,833.34	(U)	EXPUNGE

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

** (A) - Administrative
(P) - Priority

(S) - Secured
(U) - Unsecured

(T) - Total

**In re: Met-Coil Systems Corporation
OMNIBUS 2: EXHIBIT D - NO LIABILITY CLAIMS**

Creditor Name / Address	Case Number	Claim Number	Docketed Claim Date	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
18 MEYER, DEBORAH C/O BRIAN SHAW & JOHN SHELDON SHAW GUSSIS FISHMAN GLANTZ 321 N CLARK #800 CHICAGO IL 60610	03-12676	198	11/13/2003	\$75,000.00	(U)	EXPUNGE
19 MULACEK, KAREN C/O BRIAN SHAW & JOHN SHELDON SHAW GUSSIS FISHMAN GLANTZ 321 N CLARK #800 CHICAGO IL 60610	03-12676	193	11/13/2003	\$2,005,000.00	(U)	EXPUNGE
20 MURPHY, KEVIN K 5819 ELM ST LISLE IL 60532-2729	03-12676	249	11/14/2003	UNKNOWN	(U)	EXPUNGE
21 NEIL C STURCHIO PHD 919 DAKOTA CIR NAPERVILLE IL 60563-1496	03-12676	132	10/30/2003	\$12,937.50	(U)	EXPUNGE. INADEQUATE SERVICES PROVIDED NOT SUPPORT PAYMENT OF ANY AMOUNTS
22 NEW ENGLAND HVAC SERVICES CORP C/O SMITH & DORAN PC 60 WASHINGTON ST MORRISTOWN NJ 07960-6859	03-12676	121	10/27/2003	\$800,000.00	(U)	EXPUNGE
23 OFFERMAN, PAT 5901 KATRINE AVE DOWNERS GROVE IL 60516-1007	03-12676	49	10/10/2003	BLANK	(U)	EXPUNGE
24 OXFORD MACHINERY SALES CORP 92 GARDNER ST WORCESTER MA 01610	03-12676	245	11/14/2003	UNKNOWN	(U)	EXPUNGE
25 PAPADOPOLOUS, MICHAEL C/O BRIAN SHAW & JOHN SHELDON SHAW GUSSIS FISHMAN GLANTZ 321 N CLARK #800 CHICAGO IL 60610	03-12676	191	11/13/2003	\$2,015,000.00	(U)	EXPUNGE. UNLIQUIDATED AND CONTINGENT
26 PARRILLO, ANTHONY & LOUISE 3 JOBSON CT TOMS RIVER NJ 08757	03-12676	161	11/10/2003	UNKNOWN	(U)	EXPUNGE
27 PARRILLO, GERALDINE 72 SALTER PL BELLEVILLE NJ 07109-1127	03-12676	81	10/16/2003	\$600.00	(P)	EXPUNGE. NO BASIS GIVEN FOR PRIORITY TREATMENT CLAIMED

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

** (A) - Administrative
(P) - Priority

(S) - Secured
(U) - Unsecured

(T) - Total

**In re: Met-Coil Systems Corporation
OMNIBUS 2: EXHIBIT D - NO LIABILITY CLAIMS**

Creditor Name / Address	Case Number	Claim Number	Docketed Claim Date	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
28 PARRILLO, STEVEN 72 SALTER PL BELLEVUE NJ 07109-1127	03-12676	82	10/16/2003	\$600.00	(P)	EXPUNGE. NO BASIS GIVEN FOR PRIORITY TREATMENT CLAIMED
29 PELZER, DANIEL C/O BRIAN SHAW & JOHN SHELDON SHAW GUSSIS FISHMAN GLANTZ 321 N CLARK #800 CHICAGO IL 60610	03-12676	199	11/13/2003	\$75,000.00	(U)	EXPUNGE
30 PENSION BENEFIT GUARANTY CORPORATION ATTN RICHARD PERRY OFFICE OF THE GENERAL COUNSEL 1200 K ST NW, #340 WASHINGTON DC 20005-4026	03-12676	232	11/14/2003	UNKNOWN	(U)	EXPUNGE
31 PENSION BENEFIT GUARANTY CORPORATION ATTN RICHARD PERRY OFFICE OF THE GENERAL COUNSEL 1200 K ST NW, #340 WASHINGTON DC 20005-4026	03-12676	233	11/14/2003	\$80,687.00	(P)	EXPUNGE
32 PENSION BENEFIT GUARANTY CORPORATION ATTN RICHARD PERRY OFFICE OF THE GENERAL COUNSEL 1200 K ST NW, #340 WASHINGTON DC 20005-4026	03-12676	234	11/14/2003	\$1,870,300.00	(A)	EXPUNGE
33 PEPPING, SALLY C/O BRIAN SHAW & JOHN SHELDON SHAW GUSSIS FISHMAN GLANTZ 321 N CLARK #800 CHICAGO IL 60610	03-12676	200	11/13/2003	\$75,000.00	(U)	EXPUNGE
34 PUNTERO, PHILIP C/O DAVID P BONACCORSI ESQ BERNARD BALGLEY & BONACCORSI 3900 NEWPARK MALL RD 3RD FL NEWARK CA 94580	03-12676	154	11/7/2003	\$821,705.15	(U)	EXPUNGE

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

** (A) - Administrative
(P) - Priority

(S) - Secured
(U) - Unsecured

(T) - Total

**In re: Met-Coil Systems Corporation
OMNIBUS 2: EXHIBIT D - NO LIABILITY CLAIMS**

Creditor Name / Address	Case Number	Claim Number	Docketed Claim Date	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
35 RED RIVER MACHINERY INC C/O CYNTHIA SAITER CONNOLLY ESQ SCOTT DOUGLASS & MCCONNICO LLP 600 CONGRESS AVE #1500 AUSTIN TX 78701-2689	03-12676	183	11/13/2003	\$819,131.53	(U)	EXPUNGE
36 SCHREIBER, ANNE LANDIS RATH & COBB LLP 919 MARKET ST #800 WILMINGTON DE 19801	03-12676	175	11/11/2003	UNKNOWN	(U)	EXPUNGE
37 STASTNY, JAMES & VALERIE 725 GAMBLE DR LISLE IL 60532-2467	03-12676	37	10/9/2003	UNKNOWN	(U)	EXPUNGE
38 T & D MEJDRECH & MARY & MARK BENO ET AL LANDIS RATH & COBB LLP 919 MARKET ST #800 WILMINGTON DE 19801	03-12676	174	11/11/2003	UNKNOWN	(U)	EXPUNGE.
39 TRUSEAL TECHNOLOGIES INC C/O MICHAEL S TUCKER ESQ ULMER & BERNE LLP 1300 E 9TH ST #900 CLEVELAND OH 44114-1583	03-12676	157	11/7/2003	\$71,190.76	(U)	EXPUNGE
40 VARGA, GEORGE 43 BILLINGSLEY DR LIVINGSTON NJ 07039-4624	03-12676	241	11/14/2003	BLANK	(U)	EXPUNGE
41 WILLIAMS, ROGER C/O FARHAN YOUNUS 200 W JACKSON BLVD LOUIS G ATSAVES LTD CHICAGO IL 60608-6910	03-12676	47	10/10/2003	\$75,000.00	(U)	EXPUNGE
42 WROBLE, ANDREW C/O BRIAN SHAW & JOHN SHELDON SHAW GUSSIS FISHMAN GLANTZ 321 N CLARK #900 CHICAGO IL 60610	03-12676	189	11/13/2003	\$2,042,500.00	(U)	EXPUNGE. FINAL PRETRIAL MOTIONS STILL PENDING.

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

** (A) - Administrative
(P) - Priority

(S) - Secured
(U) - Unsecured

(T) - Total

**In re: Met-Coil Systems Corporation
OMNIBUS 2: EXHIBIT D - NO LIABILITY CLAIMS**

Creditor Name / Address	Case Number	Claim Number	Docketed Claim Date	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
43 WROBLE, LAURA C/O BRIAN SHAW & JOHN SHELDON SHAW GUSSIS FISHMAN GLANTZ 321 N CLARK #800 CHICAGO IL 60610	03-12676	195	11/13/2003	\$75,000.00	(U)	EXPUNGE

Totals:	\$31,000,000.00	(S)
	\$1,870,300.00	(A)
	\$81,887.00	(P)
	\$22,678,992.28	(U)

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

** (A) - Administrative
(P) - Priority

(S) - Secured
(U) - Unsecured

(T) - Total

EXHIBIT E

EXECUTORY CONTRACT CLAIMS

In re: Met-Coil Systems Corporation
OMNIBUS 2: EXHIBIT E - EXECUTORY CONTRACTS CLAIMS

	Creditor Name / Address	Case Number	Claim Number	Docketed Claim Date	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
1	FABRICATING MACHINE TOOLS 12360 PLAZA DR CLEVELAND OH 44130-1043	03-12676	150	11/6/2003	\$13,163.00	(U)	EXPUNGE
2	FORMTEK INC ATTN NANCY A PETERMAN ESQ GREENBERG TRAUIG PC 77 WEST WACKER DR #2400 CHICAGO IL 60601	03-12676	228	11/14/2003	\$550,413.00	(U)	EXPUNGE
3	FRIEDEN, DAVID F 2791 JEREMY CT NW SWISHER IA 52338-9419	03-12676	67	10/14/2003	\$824.27	(U)	EXPUNGE
4	KEYSER PROPERTIES INC ATTN NANCY A PETERMAN ESQ 77 WEST WACKER DR STE 2400 GREENBERG TRAUIG PC CHICAGO IL 60601	03-12676	231	11/14/2003	\$101,755.00	(U)	EXPUNGE
5	LOCKFORMER EUROPE UK BRUNSWICK RD UNIT 4 BRUNSWICK IND CTR COBBS WOOD INDUSTRIAL EST ASHFORD KE TN23 IEH UNITED KINGDOM	03-12676	252	11/17/2003	\$4,473.37	(U)	EXPUNGE
6	PAC LOCKFORMER EUROPE WOLWEVERSTRAAT 43 CE RIDDERKERK 2984 HOLLAND	03-12676	251	11/17/2003	\$5,113.32	(U)	EXPUNGE
Totals:					\$675,741.96	(U)	

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

****(A)** - Administrative
(P) - Priority

(S) - Secured
(U) - Unsecured

(T) - Total

EXHIBIT F

DECLARATION OF CHARLES F. KUONI, III

**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.)	
)	
)	
)	
)	

**DECLARATION OF CHARLES F. KUONI, III IN SUPPORT OF DEBTOR'S
SECOND OMNIBUS OBJECTION (SUBSTANTIVE) TO CERTAIN CLAIMS
PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE, RULE 3007
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND
RULE 3007-1 OF THE LOCAL RULES OF BANKRUPTCY PROCEDURE**

I, CHARLES F. KUONI, III hereby declare under penalty of perjury:

Background

1. I am the President and Chief Executive Officer of Met-Coil Systems Corporation.
2. I make this declaration in connection with the Debtor's Second Omnibus Objection (Substantive) To Certain Claims Pursuant To Section 502 Of The Bankruptcy Code And Rule 3007 Of The Federal Rules Of Bankruptcy Procedure Rule 3007-1 Of The Local Rules of Bankruptcy Procedure (the "Objection"). Capitalized terms not otherwise defined herein have the meanings given to them in the Objection.
3. I am responsible for reviewing and analyzing claims filed in the Debtor's Chapter 11 case. I am familiar with the activities that have taken place to date with respect to the claims asserted in this case, including all of the facts and circumstances described in the Objection and the relief requested therein.

Compliance with Local Rule 3007-1

4. I have reviewed Local Rule 3007-1 and hereby state that to the best of my knowledge and belief, this Objection is in compliance therewith.

Claims Miscategorized as Priority

5. I have reviewed each of the claims identified on Exhibit A to the Objection (the "Non-Priority Claims"), the claims register being maintained in this case and the facts and circumstances set forth in the Objection regarding such Non-Priority Claims. Based upon this review, I submit that the facts and circumstances set forth in the Objection are true and accurate to the best of my knowledge, information and belief, and that the Non-Priority Claims should be reclassified as general unsecured, non-priority claims.

Unsubstantiated Claims

6. I have reviewed each of the claims identified on Exhibit B to the Objection (the "Unsubstantiated Claims"), the claims register being maintained in this case and the facts and circumstances set forth in the Objection regarding such Unsubstantiated Claims. Based upon this review, I submit that the facts and circumstances set forth in the Objection are true and accurate to the best of my knowledge, information and belief, and that the Unsubstantiated Claims should be disallowed in full and expunged.

Contingent/Unliquidated Claims

7. I have reviewed each of the claims identified on Exhibit C to the Objection (the "Contingent/Unliquidated Claims"), the claims register being maintained in this case and the facts and circumstances set forth in the Objection regarding such Contingent/Unliquidated Claims. Based upon this review, I submit that the facts and circumstances set forth in the Objection are true

and accurate to the best of my knowledge, information and belief, and that the Contingent/Unliquidated Claims should be disallowed in full and expunged.

No Liability Claims

8. I have reviewed each of the claims identified on Exhibit D to the Objection (the "No Liability Claims"), the claims register being maintained in this case and the facts and circumstances set forth in the Objection regarding such No Liability Claims. Based upon this review, I submit that the facts and circumstances set forth in the Objection are true and accurate to the best of my knowledge, information and belief, and that the No Liability Claims should be disallowed in full and expunged.

Executory Contract Claims

9. I have reviewed each of the claims identified on Exhibit E to the Objection (the "Executory Contract Claims"), the claims register being maintained in this case and the facts and circumstances set forth in the Objection regarding such Executory Contract Claims. Based upon this review, I submit that the facts and circumstances set forth in the Objection are true and accurate to the best of my knowledge, information and belief, and that the Executory Contract Claims should be disallowed in full and expunged.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. Executed on December 5, 2003.



Charles F. Kuoni, III
Met-Coil Systems Corporation

EXHIBIT G

PROPOSED FORM OF 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 DISALLOWING AND EXPUNGING OR RECLASSIFYING CERTAIN
CLAIMS (RE: SECOND OMNIBUS OBJECTION (SUBSTANTIVE) D.I. ____)**

Upon the second omnibus objection (substantive) (D.I. ____) (the "Objection") of the debtor and debtor in possession in the above-captioned case (collectively, the "Debtor"), requesting an Order pursuant to § 502 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007 of the Bankruptcy Rules and Rule 3007-1 of the Local Rules, disallowing and expunging or reclassifying the Claims listed on Exhibits A through E to the Objection; and upon the Declaration of Charles F. Kuoni, III in support of the Objection; and upon all other documentation filed in connection with the Objection and the Claims; and notice of the Objection having been given to the Office of the United States Trustee, the Committee, the post-petition lender, each of the parties listed on Exhibits A through E to the Objection, and all other parties requesting notice pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure; and it appearing that no further notice is required; and sufficient cause appearing therefore;

IT IS HEREBY ORDERED THAT:

1. The Objection is GRANTED with respect to each of the claims listed on Exhibits A through E to the Objection.
2. Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Objection.

3. Each of the Non-Priority Claims identified on Exhibit A to the Objection is hereby reclassified as a non-priority, general unsecured claim.

4. Each of the Unsubstantiated Claims identified on Exhibit B to the Objection is hereby disallowed in full and expunged.

5. Each of the Contingent/Unliquidated Claims identified on Exhibit C to the Objection is hereby disallowed in full and expunged.

6. Each of the No Liability Claims identified on Exhibit D to the Objection is hereby disallowed in full and expunged.

7. Each of the Executory Contract Claims identified on Exhibit E to the Objection is hereby disallowed in full and expunged.

Dated: Wilmington, Delaware
_____, 2004

THE HONORABLE MARY F. WALRATH
CHIEF UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 2

Supplemental 2nd Omnibus Objection for Met-Coil

Total number of parties: 1

Preferred Mode of Service: Fax

Exhibit 2 - Met Coil Mailing

Svc Lst Name and Address of Served Party

7461 JAMES R. MURRAY, ESQ., TRESSLER SODERSTROM MALONEY & PREISS, 312-627-1717

Subtotal for this group: 1