

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

In re:

MET-COIL SYSTEMS CORPORATION,

Debtor.

Chapter 11

Case No. 03-12676 (MFW)

Hearing Date: TBD

Objection Deadline: TBD

Ref. Docket No. 595

**MOTION TO SHORTEN NOTICE PERIOD AND
APPROVE THE FORM AND MANNER OF NOTICE**

Theresa Mejdrech, Daniel Mejdrech, Mary Beno and Mark Beno, individually and on behalf of all persons similarly situated (collectively, the “Movants”), by and through their undersigned counsel, hereby request 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(e) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”) approving the form and manner of notice of the Movants’ Motion to Modify the Automatic Stay (the “Lift Stay Motion”).¹

Pursuant to the Lift Stay Motion, the Movants seek, *inter alia*, entry of an order to modify the automatic stay to permit a two year old class action lawsuit pending before the United State District Court for the Northern District of Illinois, Eastern Division captioned Theresa Mejdrech, et al. v. The Lockformer Company, et al. C.A. No. 01C6107 (“the Mejdrech Action”) to proceed to trial on liability issues only on April 19, 2004. At the February 17, 2004 hearing before this Court in this matter, the Court and all parties agreed that any such relief from stay request could be heard at the March 8, 2004 hearing.

¹ All capitalized terms not otherwise defined herein shall assume the meanings ascribed to them in the Lift Stay Motion.

Local Rule 9006-1(c) requires that all motion papers shall be filed and served at least fifteen days prior to a hearing date scheduled for such motion, and eighteen days if notice is given by mail, unless the Bankruptcy Rules state otherwise.

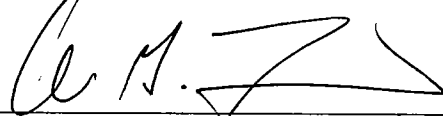
Moreover, Local Rule 9006-1(c) requires that the objection deadline with respect to motions be scheduled to permit all objections to be filed and served at least five (5) business days before the hearing date. The Movants hereby request approval of an objection deadline for the Lift Stay Motion of March 3, 2004 at 4:00 p.m., which is approximately three (3) business days before the proposed hearing on the Lift Stay Motion. The Movants submit that this objection deadline is appropriate under the circumstances.

CONCLUSION

WHEREFORE, the Movants respectfully request the entry of an order approving the shortened notice period requested herein and the form, manner and sufficiency of notice of the Lift Stay Motion and granting such other and further relief as may be just and proper.

Dated: February 27, 2004
Wilmington, DE

LANDIS RATH & COBB LLP



Adam G. Landis (No. 3407)
Daniel B. Rath (No. 3022)
Kerri K. Mumford (No. 4186)
919 Market Street, Suite 600
Wilmington, DE 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450

- and -

Norman Berger, Esquire
VARGA BERGER LEDSKY AND HAYES
224 South Michigan Avenue, Suite 350
Chicago, IL 60604
(312) 341-9400

- and -

Shawn M. Collins, Esquire
Edward J. Manzke, Esquire
THE COLLINS LAW FIRM
1770 North Park Street, Suite 200
Naperville, IL 60563
(630) 527-1595

Counsel to Theresa Mejdrech, Daniel Mejdrech, Mary
Beno, Mark Beno individually and on behalf of all persons
similarly situated