

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

In re:	)	Chapter 11
	)	
MET-COIL SYSTEMS CORPORATION,	)	Case No. 03-12676
	)	
Debtor.	)	
<hr style="width: 50%; margin-left: 0;"/>		

**AFFIDAVIT OF SERVICE RE [DOCKET NO. 625]:**

**Document 1 NOTICE OF DEBTOR'S FOURTH OMNIBUS OBJECTION (NON-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**

**Document 2 DEBTOR'S FOURTH OMNIBUS OBJECTION (NON-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, James H. Myers, 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.

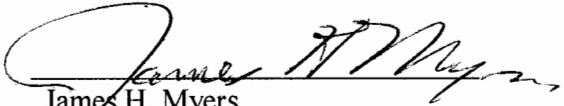
2. On March 4, 2004, at the direction of Goldberg, Kohn, Bell, Black, Rosenbloom & Moritz, LTD., co-counsel to the debtor, I caused service of the documents attached hereto as Exhibit 1 to be effected on the parties listed in Exhibit 2. Those parties who have requested special notice are referenced as Service List 8044 and the Affected Parties are referenced as Service List Service List 8045.

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3. Such service was effected via first-class mail and deposited with the United States Postal Service with postage thereon fully prepaid.

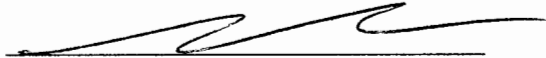
I declare under penalty of perjury that the foregoing is true and correct.

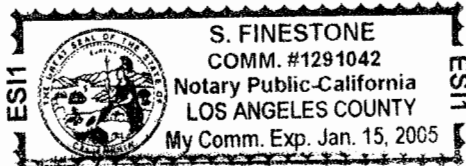
DATED: March 8, 2004  
El Segundo, California

  
James H. Myers

State of California            )  
  ) ss  
County of Los Angeles        )

Personally appeared before me on March 8, 2004, James H. Myers, an individual, known to me to be the person who executed the foregoing instrument and acknowledged the same.





**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.	)	
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**DECLARATION OF CHARLES F. KUONI, III  
OF MET-COIL SYSTEMS CORPORATION IN SUPPORT OF DEBTOR'S  
FOURTH OMNIBUS OBJECTION (NON-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 President and Chief Executive Officer of Debtor Met-Coil Systems Corporation.
2. I make this declaration in connection with the Debtor's Fourth Omnibus Objection (Non-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 "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 generally 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.

**Duplicate Claims**

5. I have reviewed each of the claims identified on Exhibit A to the Objection (the "Duplicate Claims"), the claims register being maintained in this case and the facts and circumstances set forth in the Objection regarding such Duplicate 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 Duplicate Claims should be disallowed in full and expunged.

**Superseded Claims**

6. I have reviewed each of the claims identified on Exhibit B to the Objection (the "Superseded Claims"), the claims register being maintained in this case and the facts and circumstances set forth in the Objection regarding such Superseded 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 Superseded Claims should be disallowed in full and expunged.

**Late-Filed Claims**

7. I have reviewed each of the claims identified on Exhibit C to the Objection (the "Late-Filed Claims"), the claims register being maintained in this case and the facts and circumstances set forth in the Objection regarding such Late-Filed 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 Late-Filed 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 March \_\_, 2004.



Charles F. Kuoni, III  
Met-Coil Systems Corporation

**EXHIBIT E**

**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.	)	
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**ORDER DISALLOWING AND EXPUNGING CERTAIN CLAIMS  
(RE: FOURTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) D.I. \_\_\_\_)**

Upon the fourth omnibus objection (non-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 in full and expunging the Claims listed on Exhibits A, B and C 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 Debtor's post-petition lender, each of the parties listed on Exhibits A, B and C to the Objection, and all other parties requesting notice pursuant to Rule 2002 of the Bankruptcy Rules; and it appearing that no further notice is required; and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT:**

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

3. Each of the Duplicate Claims identified on Exhibit A to the Objection is hereby disallowed in full and expunged.

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

5. Each of the Late-Filed Claims identified on Exhibit C to the Objection is hereby disallowed in full and expunged.

6. This Order does not preclude, limit or otherwise affect the Debtor's right to file a cause of action, including any cause of action under §§ 544, 545, 547, 548, 549, 550, 551 or 553(b) of the Bankruptcy Code, against any of the claimants listed on Exhibits A-C to this Order.

Dated: Wilmington, Delaware  
\_\_\_\_\_, 2004

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THE HONORABLE MARY F. WALRATH  
CHIEF UNITED STATES BANKRUPTCY JUDGE



## **EXHIBIT 2**

# 4th Omnibus Objection to Claims for Met-Coil

Total number of parties: 92

Mode of Service: US Mail (1st Class)

## Exhibit 2 - Met-Coil Mailing

### Svc Lst Name and Address of Served Party

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8045	A 1 DISPOSAL SERVICE, PO BOX 5410, ROCK ISLAND, IL 61204-5410
8045	A 1 DISPOSAL SERVICE, PO BOX 5410, ROCK ISLAND, IL 61204-5410
8045	AMERICAN EXPRESS TRAVEL RELATED SVCS CO, C/O BECKET & LEE LLP, PO BOX 3001, MALVERN, PA 19355-0701
8045	AMERICAN EXPRESS TRAVEL RELATED SVCS CO, C/O BECKET & LEE LLP, PO BOX 3001, MALVERN, PA 19355-0701
8045	AMERICAN SANITARY INCORPORATED, AMSAN VONACHEN ELTON, PO BOX 3156, PEORIA, IL 61612-3156
8045	AMERITECH, SBC MIDWEST BANKRUPTCY GROUP, PO BOX 981268, WEST SACRAMENTO, CA 95798
8045	ASSOCIATED BAG COMPANY, 400 W BODEN ST, MILWAUKEE, WI 53207
8044	ASST STATES ATTY, DEBORAH SMITH ESQ, 505 N COUNTY FARM RD, WHEATON, IL 60187
8044	ATTY GEN OF STATE OF ILLINOIS, ELIZABETH WALLACE ESQ, 188 W RANDOLPH ST, STE 2001, CHICAGO, IL 60601
8044	ATTYS FOR ERIC D GREEN, LEGAL REPRESENTATIVE FOR F, YOUNG CONAWAY STARGATT & TAYLOR LLP, JAMES L PATTON ESQ, THE BRANDYWINE BLDG, 17TH FL, WILMINGTON, DE 19801
8044	ATTYS FOR ERIC D GREEN, LEGAL REPRESENTATIVE FOR F, YOUNG CONAWAY STARGATT & TAYLOR, EDWIN J HARRON ESQ, THE BRANDYWINE BLDG, 1000 WEST ST 17TH FL, WILMINGTON, DE 19801
8044	ATTYS FOR ERIC D GREEN, LEGAL REPRESENTATIVE FOR F, YOUNG CONAWAY STARGATT & TAYLOR, TIMOTHY P CAIRNS ESQ, THE BRANDYWINE BLDG, 100 WEST ST 17TH FL, WILMINGTON, DE 19801
8045	BACHKNIVES, DIV HERMANITE CORP, PO BOX 7000, 50 SEAVIEW BLVD, PORT WASHINGTON, NY 11050-4618
8044	BAKER & MCKENZIE, DAVID HACKETT ESQ, 130 E RANDOLPH DR, CHICAGO, IL 60606
8044	BDI, TERRY DREISMEIER, 3523 J ST SW, CEDAR RAPIDS, IA 52404
8044	BECKET AND LEE LLP, THOMAS A LEE III, PO BOX 3001, MALVERN, PA 19355
8045	BEI TECHNOLOGIES INC, 7230 HOLLISTER AVE, GOLETA, CA 93117-2807
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8044	BRACEWELL & PATTERSON LLP, MARCY E KURTZ, 711 LOUISIANA ST, STE 2900, HOUSTON, TX 77002-2781
8045	CENTERPOINT ENERGY MARKETING INC, EULER HERMES ACI AGENT, 800 RED BROOK BLVD, OWINGS MILLS, MD 21117
8045	CONSTELLATION NEW ENERGY, DEPT 4073, PO BOX 2088, MILWAUKEE, WI 53201-2088
8044	COZEN O'CONNOR, MICHAEL HYNES, 1900 MARKET ST, THE ATRIUM, 4TH FL, PHILADELPHIA, PA 19103
8044	COZEN O'CONNOR, SHELLEY KINSELLA, CHASE MANHATTAN CENTRE, 1201 N MARKET ST, STE 1400, WILMINGTON, DE 19801
8044	DONOHUE BROWN MATHEWSON & SMYTH, NORMAN BARRY ESQ, 140 S DEARBORN, STE 700, CHICAGO, IL 60603
8044	DURO DYNE CORP, WILLIE VASQUIN, 81 SPENCE ST, BAY SHORE, NY 11706
8044	DURO DYNE CORP., WEINBERG KALEY GROSS & PERGAMENT, MARC A PERGAMENT ESQ, 400 GARDEN CITY PLAZA, SUITE 403, GARDEN CITY, NY 11530
8044	EARLE M JORGENSEN CO, MINU PATEL, 1900 MITCHELL BLVD, SCHAUMBURG, IL 60193
8044	EDMUND J SCANLAN LTD, EDMUND SCANLAN/MARIO PALERMO, 134 N LASALLE ST, STE 1700, CHICAGO, IL 60602
8045	ELECTRO COATINGS OF IOWA INC, C/O DARLENE M COX, 911 SHAVER RD NE, CEDAR RAPIDS, IA 52402
8044	FLEET NATIONAL BANK, BULKLEY RICHARDSON AND GELINAS, LL, MARK D CRESS ESQ, 1500 MAIN STREET, SUITE 2700, SPRINGFIELD, MA 01115

## Exhibit 2 - Met-Coil Mailing

### Svc Lst Name and Address of Served Party

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8044	FLETCHER-REINHARDT CO, SHARON EDWARDS, 3105 CORPORATE EXCHANGE CT, BRIDGETON, MO 63044
8044	GROUNDWATER SERVICES INC, ROBERT S LEE, 2211 NORFOLK, STE 1000, HOUSTON, TX 77098
8044	HARTFEIL COMPANY, TERRY CHOSTNER, 3055 99TH ST, URBANDALE, IA 50322
8044	HONEYWELL INTERNATIONAL, INC., MCDERMOTT, WILL & EMERY, STEPHEN B SELBST ESQ, 50 ROCKEFELLER PLAZA, NEW YORK, NY 10020
8044	HYPERTHERM INC, HYPERTHERM INC, SHERRY ALLAN, ETNA ROAD, PO BOX 5010, HANOVER, NH 03755
8044	INDUSTRIAL ENGINEERING, LARRY PHILIPP MGR, 967 33RD AVE SW, CEDAR RAPIDS, IA 52404
8044	INGERSOLL-RAND COMPANY, CATHY LUNDERMAN, 635 W 12TH ST, BAXTER SPRINGS, KS 66713
8045	IOWA FLUID POWER INC, PO BOX 10107, CEDAR RAPIDS, IA 52410-0107
8044	KLEIN THORPE AND JENKINS, DENNIS WALSH ESQ, 15010 S RAVINIA AVE, STE 17, ORLAND PARK, IL 60462-3162
8044	M KENNY, L WROBLE, DA EHRHART ETAL, SHAW GUSSIS FISHMAN ET AL, B L SHAW/J M SHELDON, 321 N CLARK STREET, STE 800, CHICAGO, IL 60610
8044	MB FINANCIAL BANK NA, PETER STRAUS, 3232 W PETERSON AVE, CHICAGO, IL 60659
8044	MESTEK INC, GREENBERG TAURIG LLP, FRANCIS CETERA ESQ, 77 W WACKER, STE 2500, CHICAGO, IL 60601
8044	MESTEK INC, GREENBERG TAURIG LLP, NANCY MITCHELL ESQ, 77 W WACKER, STE 2500, CHICAGO, IL 60601
8044	MESTEK INC, GREENBERG TAURIG LLP, NANCY PETERMAN, 77 W WACKER, STE 2500, CHICAGO, IL 60601
8044	MESTEK INC, GREENBERG TAURIG LLP, SCOTT D COUSINS ESQ, THE BRANDYWINE BUILDING, 1000 WEST STREET #1540, WILMINGTON, DE 19801
8044	MESTEK INC, GREENBERG TAURIG LLP, WM CHAPMAN JR, THE BRANDYWINE BLDG, 1000 WEST ST #1540, WILMINGTON, DE 19801
8044	MESTEK INC, GREENBERG TAURIG LLP, SCOTT COUSINS, THE BRANDYWINE BLDG, 1000 WEST ST, STE 1540, WILMINGTON, DE 19801
8044	MESTEK, INC., GREENBERG TAURIG LLP, KEITH SHAPIRO ESQ, 77 WEST WACKER, SUITE 2500, CHICAGO, IL 60601
8044	MET-COIL SYSTEMS CORPORATION, GOLDBERG KOHN BELL BLACK ET AL, R BARLIANT ESQ/K PAMENTER ESQ, 55 E MONROE ST, STE 3700, CHICAGO, IL 60603
8044	MET-COIL SYSTEMS CORPORATION, MORRIS NICHOLS ARSHT & TUNNELL, ERIC SCHWARTZ/JASON HARBOUR ESQ, 1201 N MARKET ST, WILMINGTON, DE 19801
8045	MIDCO ELECTRIC SUPPLY, 7237 W 90TH PL, BRIDGEVIEW, IL 60455-2151
8044	MONZACK AND MONACO PA, FRANCIS A MONACO JR ESQ, 1201 N ORANGE ST, STE 400, PO BOX 2031, WILMINGTON, DE 19899-2031
8044	MOTION INDUSTRIES INC, GAIL, 1451 AUCUTT RD, MONTGOMERY, IL 60538
8045	MSC INDUSTRIAL SUPPLY CO, 75 MAXESS RD, MELVILLE, NY 11747-3151
8045	NEW ENGLAND HVAC SERVICES CORP, C/O SMITH & DORAN PC, 60 WASHINGTON ST, MORRISTOWN, NJ 07960-6859
8044	OFFICE OF THE UNITED STATES TRUSTEE, MARGARET HARRISON ESQ, J CALEB BOGGS FEDERAL BLDG, 844 N KING STREET RM 2207, WILMINGTON, DE 19801
8044	OFFICIAL COMMITTEE OF UNSECURED CREDITORS, KLEHR HARRISON HARVEY BRANZBURG, JOANNE WILLS ESQ/DENISE KRAFT ESQ, 919 MARKET ST, STE 1000, WILMINGTON, DE 19801
8044	OFFICIAL COMMITTEE OF UNSECURED CREDITORS, KLEHR HARRISON HARVEY BRANZBURG, RICHARD M BECK ESQ, 260 S BROAD ST, PHILADELPHIA, PA 19102-5003
8045	ONYX WASTE SERVICES INC, C/O D&B/RMS BANKRUPTCY SERVICES, PO BOX 5126, TIMONIUM, MD 21094
8044	PACESETTER STEEL SERVICE, ANDREW HUGHES ESQ, 3300 TOWN POINT DR, KENNESAW, GA 30144-9207
8044	PENSION BENEFIT GUARANTY CORPORATION, OFFICE OF THE GENERAL COUNSEL, JOHN R PALIGA ESQ, 1200 K STREET NW, WASHINGTON, DC 20005-4026
8044	PIONEER WORKSPACE SOLUTIONS, BRENDA GARBE, 1239 FIRST AVENUE SE, CEDAR RAPIDS, IA 52402
8045	PITNEY BOWES CREDIT CORPORATION, ATTN RECOVERY DEPT, 27 WATERVIEW DR, SHELTON, CT 06484-4361
8044	PRECISION INDUSTRIES, PATSY JASA, 4611 S 96TH ST, CHAMA, NE 68127

## Exhibit 2 - Met-Coil Mailing

### Svc Lst Name and Address of Served Party

8044 PRODUCTION PRODUCTS LTD, PAUL STRATTON, 5005 8TH AVE, MARION, IA 52302

8044 RED RIVER MACHINERY INC, PASSMAN & JONES PC, A ASHLEY BRACKEN JR ESQ, 1201 ELM ST, STE 2500, DALLAS, TX 75270-2599

8044 RED RIVER MACHINERY INC., PASSMAN & JONES, PC, RICHARD J WALLACE III ESQ, 1201 ELM STREET, STE 2500, DALLAS, TX 75270-2599

8044 SAUL EWING LLP, DONALD DETWEILER, 222 DELAWARE AVE, STE 1200, WILMINGTON, DE 19801

8044 SCHIFF HARDIN & WAITE, JILL BERKELEY, 6600 SEARS TOWER, CHICAGO, IL 60606-6473

8045 SPEEDWAY SUPERAMERICA LLC, ATTN CREDIT CARD CTR, PO BOX 1590, SPRINGFIELD, OH 45501-1590

8045 TAYLOR, TERRY A, 1309 MAPLE AVE, LISLE, IL 60532-2133

8044 THE BAYARD FIRM, MICHAEL VILD, 222 DELAWARE AVE, STE 900, WILMINGTON, DE 19801

8045 THE MOREY CORPORATION, ATTN SCOTT EARLY & GARY ROVNER ESQ, FOLEY & LARDNER, 321 N CLARK ST STE 2800, CHICAGO, IL 60610

8045 THE STANDARD REGISTER COMPANY, 600 ALBANY ST, DAYTON, OH 45408

8044 THE TRAVELERS INDEMNITY COMPANY OF ILLINOIS, SONNENSCHN NATH & ROSENTHAL LLP, D VOBORNIK/R MILNER/D FEINBERG, 8000 SEARS TOWER, 233 S WACKER DR, CHICAGO, IL 60606

8044 THE TRAVELERS INDEMNITY COMPANY OF ILLINOIS, SONNENSCHN NATH & ROSENTHAL, PATRICK MAXCY ESQ, 8000 SEARS TOWER, 233 S WACKER DR, CHICAGO, IL 60606

8044 THE TRAVELERS INDEMNITY COMPANY OF ILLINOIS AND T, BALLARD SPAHR ANDREWS & INGERSOLL L, TOBEY M DALUZ ESQ, 919 MARKET ST, 17TH FL, WILMINGTON, DE 19801

8044 THERESA MEJDRECH, DANIEL MEJDRECH, MARY BENO, MARK, ARNSTEIN & LEHR, BARRY CHATZ, ESQ, 120 S RIVERSIDE PLAZA, SUITE 1200, CHICAGO, IL 60606

8044 THERESA MEJDRECH, DANIEL MEJDRECH, MARY BENO, MARK, LANDIS RATH & COBB LLP, ADAM G LANDIS, ESQ, 919 MARKET STREET, SUITE 600, WILMINGTON, DE 19801

8044 THERESA MEJDRECH, DANIEL MEJDRECH, MARY BENO, MARK, LANDIS RATH & COBB LLP, KERRI K MUMFORD ESQ, 919 MARKET ST, STE 600, WILMINGTON, DE 19801

8044 THERESA MEJDRECH, DANIEL MEJDRECH, MARY BENO, MARK, THE COLLINS LAW FIRM, SHAWN COLLINS, 1770 N PARK STREET, SUITE 200, NAPERVILLE, CA 60563

8044 THERESA MEJDRECH, DANIEL MEJDRECH, MARY BENO, MARK, VARGA BERGER LEDSKY HAYES & CASEY, NORMAN B BERGER ESQ, SANTA FE BLDG., 224 S MICHIGAN AVENUE #350, CHICAGO, IL 60604

8044 THERMAL REMEDIATION SERV INC, MICHAEL DODSON, 2325 HUDSON ST, LONGVIEW, WA 98632

8044 US ATTORNEYS OFFICE, ELLEN W SLIGHTS ESQ, 1201 MARKET ST, STE 1100, PO BOX 2046, WILMINGTON, DE 19899-2046

8044 US ENVIRONMENTAL PROTECTION AGENCY, THOMAS KRUEGER ESQ, MAILCODE C-14J, 77 W JACKSON BLVD, CHICAGO, IL 60606

8044 WILDMAN HARROLD ALLEN & DIXON, RON HEARD ESQ/ANTHONY HOPP ESQ, 225 W WACKER DR, STE 3000, CHICAGO, IL 60606-1229

8045 WILLIAMS, TERRY, 512 WISHERD, QUINCY, IL 62301

8045 WILSON ELSER MOSKOWITZ EDELMAN & DICKER, ATTN ROSARIO M VIGNALI, 3 GANNETT DR, WHITE PLAINS, NY 10604-3407

8045 WILSON TOOL INTERNATIONAL INC, KOHNER MANN & KAILAS SC, PO BOX 11982, 1572 EAST CAPITOL DR, MILWAUKEE, WI 53211-0982

**Subtotal for this group: 92**