

**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.	)	

**DEBTOR’S MOTION TO SHORTEN THE NOTICE PERIOD WITH RESPECT TO  
DEBTOR’S MOTION FOR LEAVE PURSUANT TO BANKRUPTCY CODE  
§ 107(b)(1) AND BANKRUPTCY RULE 9018 TO FILE *UNDER SEAL* EXHIBIT A  
TO ITS MOTION TO APPROVE SETTLEMENT AGREEMENT WITH  
ONEBEACON PURSUANT TO BANKRUPTCY CODE § 105 AND  
BANKRUPTCY RULE 9019**

The above-captioned debtor and debtor in possession, Met-Coil Systems Corporation (the “Debtor”), by and through its undersigned counsel, hereby moves this Court for 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 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), shortening notice with respect to the Debtor’s Motion For Leave Pursuant To Bankruptcy Code § 107(b)(1) And Bankruptcy Rule 9018 To File *Under Seal Exhibit A* To Its Motion To Approve Settlement Agreement With OneBeacon Pursuant To Bankruptcy Code § 105 And Bankruptcy Rule 9019 (the “Motion”),<sup>1</sup> and in support hereof, respectfully states as follows:

**Relief Requested**

1. By this Motion, the Debtor requests that the Court enter an order (a) shortening the notice period normally required by Rule 2002 to fourteen (14) days so that the Motion may be heard at the existing omnibus hearing date of **July 28, 2004 at 11:30 a.m. EST** (the “Hearing”).

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

### **Basis for Relief**

2. In the Motion, the Debtor seeks entry of an order granting the Debtor leave to file *under seal* that certain “Settlement Agreement and Release of Any and All Policy Obligations With Respect to Certain Released Claims Arising from the Released Site” (the “Settlement Agreement”) by and among the Debtor, Mestek, Inc. (“Mestek”), Formtek, Inc. (“Formtek”) and OneBeacon Insurance Group (“OneBeacon”). The Debtor submits that it is important for the Motion be heard and approved at the Hearing.

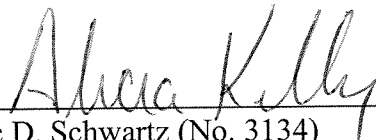
3. In the interest of judicial economy, the Debtor seeks to have the Motion heard and approved at the Hearing. The Motion is a corollary to a motion to approve the Settlement Agreement between the Debtors, Mestek, Formtek and OneBeacon. It is important to resolve as many claims as possible prior to any confirmation hearing on the Debtor’s proposed plan. Further, shortening the required notice in this instance will not cause material prejudice to any party in interest. Any party in interest would still have fourteen days to consider the Settlement Agreement. As a result, the Debtor believes that sufficient cause exists and that it is in the best interests of its estate and creditors to shorten the normal notice period to fourteen (14) days so that the Court may consider the Motion at the Hearing.. Thus, there is no likelihood of material prejudice to creditors and parties-in-interest if the Court grants the relief requested herein.

4. The Debtor has caused the Motion to be served via hand delivery or overnight courier upon (a) the United States Trustee, (b) counsel to the Committee, (c) counsel to the Debtor’s secured lender, (d) counsel to OneBeacon; (e) counsel for the future claimants’ representative; and (f) all those that have requested notice of pleadings pursuant to Bankruptcy Rule 2002.

WHEREFORE, the Debtor respectfully requests that the Court (i) enter an order approving the form, manner, sufficiency and shortening of the notice of the Motion as contemplated hereby such that a hearing on the Motion may be convened on July 28, 2004 at 11:30 a.m. EST, with objections, if any, to be filed and served on the undersigned co-counsel for the Debtor no later than July 23, 2004 at 12:00 p.m. EST; and (ii) grant such other and further relief as the Court deems just and proper.

Dated: July 14, 2004

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