

**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 JAMES WHITE

I, James White, under penalty of perjury, declare as follows:

1. I am authorized by New Hampshire Insurance Company and National Union Fire Insurance Company of Pittsburgh, PA, (“INSURERS”) to enter into this Declaration. The statements in this declaration are, except where specifically noted, based upon personal knowledge, and I am competent to testify thereto.

2. The Confidential Settlement Agreement (the “**Settlement Agreement**”) entered into by and among INSURERS, the Debtor, Mestek, Inc. and Formtek, Inc. is conditioned on the entry of the “TCE Channeling Injunction” as defined in and as part of the Fourth Amended Chapter 11 Plan of Reorganization Proposed by Met-Coil Systems Corporation and Mestek, Inc., as Co-Proponents (as amended, modified or supplemented, the “Plan”).


3. INSURERS insisted on the entry of the TCE Channeling Injunction as a condition of the effectiveness of the Settlement Agreement because the protection afforded by the TCE Channeling Injunction against personal injury actions defined in the Plan as TCE PI Trust Claims, is not otherwise available to INSURERS.

4. The entry of the TCE Channeling Injunction was a significant inducement in INSURERS' decision to enter into the Settlement Agreement and provide the Debtor with the payment contemplated by the Settlement Agreement.

5. The failure on the part of the Debtor to obtain approval of a plan of reorganization containing the TCE Channeling Injunction would cause INSURERS to terminate the Settlement Agreement.

The undersigned certifies that pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the statements set forth herein are true and correct.

Executed on July 22, 2004



James White