

# **EXHIBIT A**

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

In re:	)	Chapter 11
	)	
MET-COIL SYSTEMS, LLC (f/k/a MET-	)	Case No. 03-12676 (MFW)
COIL SYSTEMS CORPORATION),	)	
	)	
Debtor.	)	

**STIPULATION BY AND BETWEEN DEBTOR, CERTAIN PERSONAL INJURY  
PLAINTIFFS AND THE DEVANE PLAINTIFFS MODIFYING THE AUTOMATIC  
STAY FOR A LIMITED PURPOSE**

Met-Coil Systems, LLC (f/k/a Met-Coil Systems Corporation), debtor and debtor-in-possession in the above-captioned chapter 11 case (the "**Debtor**"), Daniel Pelzer, Sally Pepping, Deborah Meyer, individually and as executrix of the estate of Nicholas Meyer, deceased, and as mother and next friend of Danielle Meyer, a minor, Derek Meyer, Laura Wroble, Virginia Hallmer, and Denise Ehrhart (collectively, the "**Personal Injury Plaintiffs**"), and Jeanette DeVane, Barbara L. Frantik, Thomas G. Frantik, Lee J. Herrera, Jane Kuta, Richard Kuta, Michael Papadopolous, Andrew Wroble and Karen Mulacek (collectively, the "**DeVane Plaintiffs**"), hereby stipulate (the "**Stipulation**") and agree as follows:

**IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN  
THE UNDERSIGNED PARTIES:**

1. Pursuant to Section 362 of the Bankruptcy Code, the automatic stay is hereby modified solely to the extent necessary to allow the Debtor and the Personal Injury Plaintiffs to present a motion seeking a good faith finding, and in the case of Danielle Meyer, a minor, approval of the respective settlement agreement, from the United States District Court for the Northern District of Illinois in the matters captioned Pelzer and Pepping v.

Lockformer et al., Case No. 01-C-6485, Meyer v. Lockformer et al., Case No. 02-C-2672, Wroble v. Lockformer et al., Case No. 02-C-4992, Hallmer v. Lockformer et al., Case No. 02-C-7066, Ehrhart v. Lockformer et al., Case No. 02-C-7068.

2. Pursuant to Section 362 of the Bankruptcy Code, the automatic stay is hereby modified solely to the extent necessary to allow the Debtor and the DeVane Plaintiffs to present a motion seeking a good faith finding from the Circuit Court of DuPage County, Illinois in the matter captioned DeVane v. Lockformer et al., Case No. 01 L 377.

3. Except as set forth herein, the provisions of Section 362 of the Bankruptcy Code shall remain in full force and effect and shall not be deemed modified or waived in any manner.

4. This Stipulation may be executed in counterparts and by facsimile, each of which shall be deemed an original, but together shall constitute one and the same instrument.

5. This Stipulation shall inure to the benefit of, and be binding upon, the parties hereto and their predecessors, successors and assigns.

6. This Stipulation constitutes the entire agreement between the parties with respect to the subject matter hereof. No prior or contemporaneous agreement may be used to alter the terms of the Stipulation.

7. This Stipulation may be modified only in a writing signed by all of the parties hereto.

8. The signatories to this Stipulation represent and warrant that they have been duly authorized to execute this Stipulation.

9. This Stipulation is subject to the approval of the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

10. In the event that the Bankruptcy Court declines to approve this Stipulation, neither this Stipulation, nor any part thereof may be used by any party for any purpose, except to enforce this provision.

Dated: <sup>August 31</sup> ~~September~~, 2004

MET-COIL SYSTEMS, LLC (f/k/a  
MET-COIL SYSTEMS CORPORATION)

DANIEL PELZER, SALLY PEPPING,  
DEBORAH MEYER, INDIVIDUALLY  
AND AS EXECUTRIX OF THE  
ESTATE OF NICHOLAS MEYER,  
DECEASED, AND AS MOTHER AND  
NEXT FRIEND OF DANIELLE MEYER,  
A MINOR, DEREK MEYER, LAURA  
WROBLE, VIRGINIA HALLMER,  
DENISE EHRHART, JEANETTE  
DEVANE, BARBARA L. FRANTIK,  
THOMAS G. FRANTIK, LEE J.  
HERRERA, JANE KUTA, RICHARD  
KUTA, MICHAEL PAPADOPOLOUS,  
ANDREW WROBLE AND KAREN  
MULACEK

By: Alicia B. Kelly

By: \_\_\_\_\_  
Their: \_\_\_\_\_

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Dated: September \_\_, 2004

MET-COIL SYSTEMS, LLC (f/k/a  
MET-COIL SYSTEMS CORPORATION)

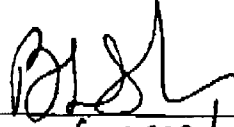
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