

**EXHIBIT D**

**DECLARATION OF CHARLES F. KUONI, III**

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

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

**DECLARATION OF CHARLES F. KUONI, III IN SUPPORT OF MET-COIL  
SYSTEMS, LLC'S NINTH OMNIBUS OBJECTION (SUBSTANTIVE) TO CERTAIN  
CLAIMS PURSUANT TO SECTIONS 502 AND 503 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 the President and Chief Executive Officer of Met-Coil Systems, LLC (f/k/a Met-Coil Systems Corporation).
2. I make this declaration in connection with Met-Coil's Ninth Omnibus Objection (Substantive) To Certain Claims Pursuant To Sections 502 and 503 Of The Bankruptcy Code And Rule 3007 Of The Federal Rules Of Bankruptcy Procedure 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 Met-Coil's Chapter 11 case. I am 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.

**Prepetition Claims Filed As Administrative Claims**

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

**Claims Previously Disallowed**

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

**No Obligation Claims**

7. I have reviewed each of the claims identified on Exhibit C to the Objection, the claims register being maintained in this case and the facts and circumstances set forth in the Objection regarding such 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 claims listed on Exhibit C 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 December \_\_\_\_, 2004.

  
Charles F. Kuoni, III