

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

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

**MET-COIL SYSTEMS, LLC'S JOINDER AND STATEMENT OF POSITION IN  
SUPPORT OF MESTEK AFFILIATES' OBJECTION TO MOTION TO  
ENFORCE THE TERMS OF THE FOURTH AMENDED CHAPTER 11 PLAN  
AND CONFIRMATION ORDER OR, IN THE ALTERNATIVE, FOR RELIEF  
FROM THE CONFIRMATION ORDER [RE: D.I. 1516]**

Met-Coil Systems, LLC, the reorganized debtor ("Met-Coil"), hereby submits its Joinder and Statement of Position in Support of Mestek Affiliates' Objection to Motion to Enforce the Terms of the Fourth Amended Chapter 11 Plan and Confirmation Order or, in the Alternative, for Relief from the Confirmation Order, with respect to the Motion of Thomas Quandt, Sam Madura, Daniel Sacco, Christine Blechschmidt, Alex Zirvirzin, Nora Marovich, on behalf of George Marovich, and Patricia L. Cedzidlo, individually and on behalf of her late husband Edward J. Cedzidlo, to Enforce the Terms of the Fourth Amended Chapter 11 Plan and Confirmation Order or, in the Alternative, for Relief from the Confirmation Order (D.I. 1516) (the "Motion").<sup>1</sup> Though the Motion does not expressly seek relief against Met-Coil, if the relief requested against the Mestek Affiliates and the other Protected Parties is granted, Met-Coil and its creditors will be severely harmed. Without Mestek's and the insurance carriers' substantial contributions to Met-Coil's Plan, in exchange for the TCE Channeling

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Fourth Amended Chapter 11 Plan of Reorganization Proposed by Met-Coil Systems Corporation and Mestek, Inc. as Co-Proponents (as amended, the "Plan").

Injunction and other releases, Met-Coil would not have been able to reorganize and make the substantial distributions to its creditors under the Plan.

For the reasons set forth in the Mestek Affiliates' Objection to Motion to Enforce the Terms of the Fourth Amended Chapter 11 Plan and Confirmation Order or, in the Alternative, for Relief from the Confirmation Order (D.I. 1522), the Motion with respect to the requested alternative relief from the Confirmation Order should be denied. Met-Coil takes no position with respect to the request that the Plan and the Confirmation Order be enforced as to the TCE PI Trust.

Dated: Wilmington, Delaware  
June 23, 2005

MORRIS, NICHOLS, ARSHT & TUNNELL



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-and-

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