

**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 NOTICE PERIOD WITH RESPECT TO
DEBTOR’S MOTION FOR ORDER AUTHORIZING THE DEBTOR TO ENTER INTO
SERVICES AGREEMENTS WITH MESTEK AND FORMTEK**

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 Order Authorizing The Debtor To Enter Into Services Agreements With Mestek, Inc. (“Mestek”) And Formtek, Inc. (“Formtek”) (the “Motion”), and in support hereof, respectfully states as follows:

Relief Requested

1. By this motion, the Debtor requests that the Court enter an order shortening the notice period normally required by Local Rule 9006-1 to twelve (12) days so that the Motion may be heard at the existing omnibus hearing date of **October 20, 2003 at 3:00 p.m. ET** (the “Hearing”).

Basis for Relief

2. In the Motion, the Debtor seeks entry of an order, under sections 105(a), 363 and 364 of title 11 of the United States Code (as amended, the “Bankruptcy Code”), authorizing the Debtor to enter into two services agreements (the “Agreements”): one with Mestek (the “Mestek

Agreement”), and one with Formtek (the “Formtek Agreement”). Shortening the required notice in this instance will not cause material prejudice to any party in interest. Further, a recent emergency has prevented the Debtor from filing the Motion in accordance with the notice requirements of Local Rule 9006-1 in order for the Motion to be heard at the Hearing.

3. As more fully described in the Motion, the Debtor has concluded, in the exercise of its business judgment, that entering into the Agreements will maximize the value of the Debtor’s estate for the benefit of all of its creditor constituencies.

4. The Debtor’s delay in filing the Motion is justified by recent emergency circumstances. Charles F. Kuoni, who is President and Chief Executive Officer of the Debtor was required to review and approve the Agreements before the Motion could be filed. During the week of September 29, 2003, an immediate member of Mr. Kuoni’s family was involved in a tragic traffic accident. These circumstances, of course, required Mr. Kuoni’s presence and attention with his family and made him unavailable to review the Formtek Agreement and the Mestek Agreement in such time that the Motion could be filed in accordance with the notice requirements of Local Rule 9006-1 and Bankruptcy Rule 2002 in order for the Motion to be heard at the Hearing.

5. 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 notice period to twelve (12) days so that the Court may consider the Motion at the Hearing. Additionally, by agreeing to move the response deadline from October 10, 2003 to October 15, 2003, the Debtor has attempted to ensure that parties in interest will have adequate time within which to respond to the Motion.

6. Thus, there is no likelihood of material prejudice to creditors and parties-in-interest if the Court grants the relief requested herein. 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

Creditors' Committee, (c) counsel to the Debtor's prepetition and postpetition lenders, and (f) any parties who have an interest in the Agreements.

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 October 20, 2003 at 3:00 p.m. ET, with objections, if any, to be filed and served on the undersigned co-counsel for the Debtor no later than October 15, 2003 at 4:00 p.m. ET; and (ii) grant such other and further relief as the Court deems just and proper.

Dated: October 8, 2003

MORRIS, NICHOLS, ARSHT & TUNNELL



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