

**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.)	
)	Re: D.I. 27, 167

**DEBTOR’S MOTION FOR LEAVE TO FILE REPLY OF DEBTOR TO THE LIMITED
OBJECTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO
DEBTOR’S MOTION PURSUANT TO 11 U.S.C. §§ 105(A) AND 365(A) AUTHORIZING
THE DEBTOR TO ASSUME THE DEBTOR’S EMPLOYMENT AGREEMENT WITH
CHARLES F. KUONI [D.I. 27, 167]**

The above-captioned debtor and debtor-in-possession (the “Debtor”), by and through its undersigned counsel, hereby moves (the “Motion”) for leave to file the attached Debtor’s Reply (the “Reply”) To The Limited Objection Of The Official Committee Of Unsecured Creditors To Debtor’s Motion Pursuant to 11 U.S.C. §§ 105(a) And 365(a) Authorizing The Debtor To Assume The Debtor’s Employment Agreement With Charles F. Kuoni, and in support hereof, respectfully states as follows:

1. On August 27, 2003, the Debtor filed the Motion Pursuant To 11 U.S.C. §§ 105(a) And 365(a) Authorizing The Debtor To Assume The Debtor’s Employment Agreement With Charles F. Kuoni (D.I. 27) (the “Assumption Motion”).
2. On October 14, 2003, the Official Committee of Unsecured Creditors (the “Committee”) filed the Limited Objection Of The Official Committee Of Unsecured Creditors To The Debtor’s Motion Pursuant To 11 U.S.C. §§ 105(a) And 365(a) Authorizing the Debtor To Assume The Debtor’s Employment Agreement With Charles F. Kuoni (D.I. 167) (the “Objection”).

3. The Court has scheduled the Motion to be heard on October 20, 2003 at 3:00 p.m. ET (the "Hearing").

4. Pursuant to Rule 9006-1(d) of the Local Rules of Bankruptcy Procedure for the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), reply papers are permitted if ordered by the Court. The Debtor hereby seeks leave of the Court to file the Reply.

5. The Reply is necessary to respond to certain statements contained in the Objection that are inaccurate and incorrect as a matter of fact and law and to address certain issues raised in the Objection that could not have been reasonably anticipated upon filing of the Assumption Motion. The Debtor respectfully submits that the Court's consideration of the Reply will help narrow the issues in dispute between the parties and expedite the Court's consideration of the Assumption Motion at the Hearing.

WHEREFORE, the Debtor respectfully requests that the Court grant it leave to file the attached Reply.

Dated: October 16, 2003

MORRIS, NICHOLS, ARSHT & TUNNELL



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Proposed attorneys for the Debtor and
Debtor-in-Possession

SO ORDERED, this _____ day of October, 2003

UNITED STATES BANKRUPTCY JUDGE