

**EXHIBIT 1**

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

In re:	)	Chapter 11
	)	
Met-Coil Systems Corporation,	)	Case No. 03-12676 (MFW)
	)	Obj. Deadline: Jan. 13, 2004 @ 4:00 p.m. ET
Debtor.	)	Hearing Date: Jan. 20, 2004 @ 10:30 a.m. ET

**NOTICE OF THIRD OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO CERTAIN  
CLAIMS PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE, RULE 3007  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND RULE 3007-1 OF  
THE LOCAL RULES OF BANKRUPTCY PROCEDURE**

**TO: ALL ENTITIES IDENTIFIED ON THE ATTACHED SERVICE LIST**

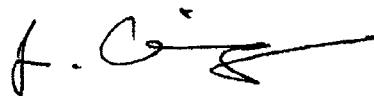
PLEASE TAKE NOTICE that the above-captioned debtor and debtor-in-possession (the "Debtor") has filed the attached Debtor's Third Omnibus Objection (Non-Substantive) To Certain Claims Pursuant To Section 502 Of The Bankruptcy Code, Rule 3007 Of The Federal Rules Of Bankruptcy Procedure And Rule 3007-1 Of The Local Rules Of Bankruptcy Procedure (the "Omnibus Objection") which seeks to alter your rights by disallowing and expunging your claim.

Responses ("Responses") to the Omnibus Objection must be filed with the United States Bankruptcy Court for the District of Delaware, Office of the Clerk, 824 Market Street, 5<sup>th</sup> Floor, Wilmington, Delaware 19801 on or before January 13, 2004 at 4:00 p.m. ET (the "Response Deadline"). Any Responses must also be served upon the undersigned counsel for the Debtor on or before the Response Deadline.

A HEARING ON THE OMNIBUS OBJECTION WILL TAKE PLACE BEFORE THE HONORABLE MARY F. WALRATH, CHIEF UNITED STATES BANKRUPTCY JUDGE AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE ON JANUARY 20, 2004 AT 10:30 P.M. ET. IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: December 5, 2003

MORRIS, NICHOLS, ARSHT & TUNNELL



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Robert J. Dehney (No. 3578)  
Eric D. Schwartz (No. 3134)  
Donna L. Harris (No. 3740)  
Jason W. Harbour (No. 4176)  
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- and -

GOLDBERG KOHN BELL BLACK  
ROSENBLOOM & MORITZ, LTD.  
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Attorneys for the Debtor and Debtor-in-Possession

**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. )  
 )  
 ) Objections Due: Jan. 13, 2004 at 4:00 p.m. (Eastern Time)  
 ) Hearing Date: Jan. 20, 2004 at 10:30 a.m. (Eastern Time)

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**DEBTOR'S THIRD OMNIBUS OBJECTION (NON-SUBSTANTIVE)  
TO CERTAIN CLAIMS PURSUANT TO SECTION 502 OF THE BANKRUPTCY  
CODE, RULE 3007 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE  
AND RULE 3007-1 OF THE LOCAL RULES OF BANKRUPTCY PROCEDURE**

Met-Coil Systems Corporation, debtor and debtor-in-possession in the above-referenced bankruptcy case (the "Debtor"), pursuant to § 502 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Local Rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), hereby objects (the "Objection") to each of the claims filed in the above-captioned case and listed on Exhibits A, B, C and D, attached hereto and incorporated herein by reference (collectively, the "Claims"). In support of this Objection, the Debtor submits the Declaration of Charles F. Kuoni, III, attached hereto as Exhibit E and incorporated herein by reference, and respectfully states as follows:

**JURISDICTION**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of the Debtor's Chapter 11 case and this Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought herein are § 502 of the Bankruptcy Code,

Bankruptcy Rule 3007 and Local Rule 3007-1.

### **BACKGROUND**

2. On August 26, 2003 (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the District of Delaware (the "Court").

3. On September 11, 2003, the United States Trustee appointed an official committee of unsecured creditors (the "Committee") in this case.

4. By order dated September 23, 2003 (D.I. 119), this Court established November 14, 2003, as the deadline for non-governmental entities to file claims against the Debtor's estate (subject to supplemental mailings as provided for therein) and February 23, 2003, as the bar date for governmental entities to file claims against the Debtor's estate (the "Bar Date").

5. On or about August 29, 2003, the Court entered an Order (D.I. 52) authorizing the Debtor to retain Bankruptcy Management Corporation ("BMC") as the claims, noticing and balloting agent in this case. Since its appointment, BMC has assisted the Debtor and its counsel with sending notices and bar date packages to creditors, providing national and local publication notice and maintaining the official claims register in the Debtor's case.

6. Claimants. Each of the claimants listed on Exhibits A, B, C and D (collectively, the "Claimants") has filed one or more proofs of claim against the Debtor's estate.

7. Review. The Debtor, in conjunction with BMC, has conducted a review of the official register of claims filed in the Debtor's case. For the reasons set forth below, the Debtor has determined that each of the Claims listed on Exhibits A, B, C and D is properly the subject of an objection on one or more grounds.

8. Compliance with Local Rule 3007-1. The Debtor and BMC have reviewed Local Rule 3007-1 and hereby state that, to the best of their knowledge and belief, this Objection is in compliance therewith.

**RELIEF REQUESTED**

9. For the reasons set forth below, the Debtor objects to each of the Claims listed on Exhibits A, B, C and D, attached hereto and incorporated herein by reference. By this Objection, the Debtor respectfully requests that the Court enter an Order pursuant to Bankruptcy Code § 502(b), Bankruptcy Rule 3007 and Local Rule 3007-1 disallowing in full the Claims listed on Exhibits A, B, C and D, as described below.

**A. Duplicate Claims - Exhibit A**

10. The Debtor objects to each of the Claims identified on the attached Exhibit A (the "Duplicate Claims") and respectfully submits that they be disallowed in full and expunged. The Debtor, in conjunction with BMC, has reviewed the official register of claims filed in the Debtor's case and each of the Duplicate Claims. Based on this review, the Debtor objects to each of the Duplicate Claims because they are redundant of other Claims filed against the Debtor by or on behalf of the same Claimants relating to the same purported liabilities. If the Claims identified on Exhibit A are not disallowed and expunged, the Claimants may obtain double recovery for the same alleged liability. By this Objection, the Debtor seeks to disallow and expunge each of the Duplicate Claims and thereby limit each Claimant to a single claim against the Debtor arising from the same alleged liability. For each of the Duplicate Claims, the Debtor has identified a surviving claim which asserts the same liability and is identified on Exhibit A in the columns labeled "Surviving Claim" and "Surviving Amount." The Surviving Claims will be unaffected by the relief requested in this Objection, and each of the Claimants'

rights to assert these liabilities against the Debtor's estate will be preserved, subject to the Debtor's reservation of its rights to object to the Surviving Claims and other claims on all grounds, whether legal, factual, procedural, substantive or non-substantive.

11. Therefore, for all of the foregoing reasons, each of the Duplicate Claims identified on Exhibit A should be disallowed in full and expunged.

**B. Unsupported Claims – Exhibit B**

12. The Debtor objects to each of the Claims identified on the attached Exhibit B (the "Unsupported Claims") and respectfully submits that they be disallowed in full and expunged. The Debtor, in conjunction with BMC, has reviewed the official register of claims filed in the Debtor's case and each of the Claims listed on Exhibit B. Based on this review, the Debtor has determined that the Unsupported Claims do not represent valid obligations of the Debtor because they were filed without any supporting documentation and therefore do not contain sufficient information for the Debtor to properly evaluate the validity of the asserted Unsupported Claims.

13. Therefore, for all of the foregoing reasons, each of the Unsupported Claims identified on Exhibit B should be disallowed in full and expunged.

**C. Superseded Claims – Exhibit C**

14. The Debtor objects to each of the Claims identified on the attached Exhibit C (the "Superseded Claims") and respectfully submits that they be disallowed in full and expunged. The Debtor, in conjunction with BMC, has reviewed the official register of claims filed in the Debtor's case and each of the Claims listed on Exhibit C. Each of the Superseded Claims has been either superseded or amended by a later filed claim filed by or on behalf of the same Claimant related to the same purported liabilities. As a result, each of the Superseded

Claims listed on Exhibit C has been rendered superfluous and therefore should be disallowed in full and expunged. Each of the Claimants' rights to assert their claim against the Debtor's estate will be preserved by the later filed claims as indicated on Exhibit C in the columns "Surviving Claim" and "Surviving Amount," subject to the Debtor's reservation of its rights to object to the remaining claims and other claims on all grounds, whether legal, factual, procedural, substantive or non-substantive.

15. Therefore, for all of the foregoing reasons, each of the Superseced Claims identified on Exhibit C should be disallowed in full and expunged.

**D. Late-Filed Claims – Exhibit D**

16. The Debtor objects to each of the Claims identified on the attached Exhibit D (the "Late-Filed Claims") and respectfully submits that they be disallowed in full and expunged. The Debtor, in conjunction with BMC, has reviewed the official register of claims filed in the Debtor's case and each of the Claims listed on Exhibit D. Based on this review, the Debtor has determined that the Late-Filed Claims were filed after the bar date established by this Court, without having sought and obtained leave of this Court.

17. Therefore, for all of the foregoing reasons, each of the Late-Filed Claims identified on Exhibit D should be disallowed in full and expunged.

**RESERVATION OF RIGHTS**

18. In this Objection, the Debtor has raised a number of objections to the Claims filed against the Debtor in this Chapter 11 case. By definition of Local Rule 3007-1, the objections contained herein are non-substantive objections. By this reservation, the Debtor seeks to reserve the right to amend, modify or supplement this Objection, and to file additional objections, substantive or non-substantive, to each of the Claims, including, without limitation,



objections as to the amount, priority, validity, timeliness or proper filing of the Claims, or any other claims (filed or not) against the Debtor. Moreover, should one or more of the grounds of objection stated in this Objection be dismissed or overruled, the Debtor reserves the right to object to each of the Claims on any other grounds that the Debtor discovers or elects to pursue.

**NOTICE**

19. Notice of this Objection has been given to the Office of the United States Trustee, the Committee, the Debtor's postpetition lender, each of the parties listed on Exhibits A, B, C and D, and all other parties that requested notice pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure. In light of the nature of the relief requested, the Debtor submits that no further notice need be given.

WHEREFORE, the Debtor respectfully requests that the Court (i) enter an Order substantially in the form attached hereto as Exhibit F disallowing in full each of the Claims identified on Exhibits A, B, C and D and (ii) granting such other and further relief as is just and proper.

Dated: Wilmington, Delaware  
December 5, 2003

GOLDBERG, KOHN, BELL, BLACK,  
ROSENBLOOM & MORITZ, LTD.

/s/ Ronald Barliant

Ronald Barliant (Illinois ARDC #0112984)  
Kathryn A. Pamenter (Illinois ARDC #6231191)  
55 East Monroe Street  
Suite 3700  
Chicago, Illinois 60603  
(312) 201-4000

MORRIS, NICHOLS, ARSHT & TUNNELL  
Eric D. Schwartz (No. 3134)  
Jason W. Harbour (No. 4176)  
James C. Carignan (No. 4230)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, Delaware 19899-1347  
(302) 658-9200

Counsel for Met-Coil Systems Corporation,  
Debtor and Debtor-in-Possession

**EXHIBIT A**

**DUPLICATE CLAIMS**

**In re: Met-Coil Systems Corporation  
OMNIBUS 3: EXHIBIT A - DUPLICATE CLAIMS**

Claim To Be Expunged		Surviving Claim		Reason For Proposed Disallowance		
Creditor Name and Address	Case No	Claim Number	Total Claims Dollars*		Claim Number	Total Claims Dollars*
1 AONODES 16502 ELM HAVEN DR HACIENDA HEIGHTS CA 91745-3735	03-12676	30	\$2,535.00	8	\$2,535.00	EXPUNGE; DUPLICATE OF CLAIM 8
2 GLOBAL COMPUTER SUPPLIES 175 AMBASSADOR DR NAPERVILLE IL 60540	03-12676	7	\$141.07	39	\$511.01	EXPUNGE; DUPLICATE TO CLAIM NO. 00039
3 GLOBAL COMPUTER SUPPLIES 175 AMBASSADOR DR NAPERVILLE IL 60540	03-12676	1	\$369.94	39	\$511.01	EXPUNGE; DUPLICATE OF CLAIM NO. 00039
4 HUDSON BEARINGS INC 13 COLTON RD EAST LYME CT 06333	03-12676	16	\$1,021.49	93	\$1,021.49	EXPUNGE; DUPLICATIVE OF CLAIM NO. 93
5 LEHIGH SAFETY SHOE CO ATTN THOMAS J BATTISTA 120 PLAZA DR STE A VESTAL NY 13850	03-12676	15	\$213.49	253	\$213.49	EXPUNGE; DUPLICATE OF CLAIM NO. 253
6 KOWA PRECISION INDUSTRIES INC 5480 8TH ST SW CEDAR RAPIDS IA 52404	03-12676	4	\$22,762.36	50	\$22,910.10	EXPUNGE; CREDITOR IMPROPERLY FILED OUT "CREDITOR NAME" SECTION; BASED UPON ATTACHED, THE CREDITOR IS LIEBOVICH FROM STEEL; DUPLICATED OF CLAIM NO. 0050
7 MAGNETROL INTERNATIONAL INC C/O MICHAEL JOHN MAHER SWANSON MARTIN & BELL 1 ERIE PLZ 340 N WABASH #2900 CHICAGO IL 60611	03-12676	164	\$50,000,000.00	186	\$50,000,000.00	EXPUNGE

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

**In re: Met-Coil Systems Corporation  
OMNIBUS 3: EXHIBIT A - DUPLICATE CLAIMS**

Claim To Be Expunged		Surviving Claim		Reason For Proposed Disallowance
Case No	Claim Number	Case No	Claim Number	
8	03-12676	03-12676	186	EXPUNGE
MAHER, MICHAEL JOHN SWANSON MARTIN & BELL 1 EM PLZ 330 NORTH WABASH #2900 CHICAGO IL 60611		MAGNETROL INTERNATIONAL INC C/O MICHAEL MAHER & ELIZABETH HARVEY SWANSON MARTIN AND BELL 330 NORTH WABASH 1 E BML PLZ #2900 CHICAGO IL 60611-7813		\$50,000,000.00
9	03-12676	03-12676	212	EXPUNGE
MOLEX INCORPORATED PAUL SCHROEDER & RAY SCHROCK JONES DAY 77 W WACKER DR #3500 CHICAGO IL 60601		MOLEX INCORPORATED PAUL SCHROEDER & RAY SCHROCK JONES DAY 77 W WACKER DR #3500 CHICAGO IL 60601		UNKNOWN UNLIQUIDATED
10	03-12676	03-12676	40	EXPUNGE. DUPLICATIVE OF CLAIM NO. 40
PITNEY BOWES CREDIT CORPORATION ATTN RECOVERY DEPT 27 WATERVIEW DR SHELTON CT 06484-4361		PITNEY BOWES CREDIT CORPORATION ATTN RECOVERY DEPT 27 WATERVIEW DR SHELTON CT 06484-4361		\$5,149.80 UNLIQUIDATED
11	03-12676	03-12676	205	EXPUNGE
SUBURBAN MOVING & STORAGE CO INC C/O STRATTON & TEMPLE & LANDGRAF 77 W WACKER DR #4400 CHICAGO IL 60601-1681		SUBURBAN MOVING & STORAGE CO INC C/O STRATTON & TEMPLE & LANDGRAF 77 W WACKER DR #4400 CHICAGO IL 60601-1681		UNKNOWN
12	03-12676	03-12676	205	EXPUNGE
MATSIK ET AL, JAN & WALT C/O STRATTON & TEMPLE & LANDGRAF 77 W WACKER DR STE 400 CHICAGO IL 60601-1681		SUBURBAN MOVING & STORAGE CO INC C/O STRATTON & TEMPLE & LANDGRAF 77 W WACKER DR #4400 CHICAGO IL 60601-1681		UNKNOWN
13	03-12676	03-12676	205	EXPUNGE
LECLERCQ ET AL, TERESA & AL C/O STRATTON & TEMPLE & LANDGRAF 77 W WACKER DR #4400 CHICAGO IL 60601-1681		SUBURBAN MOVING & STORAGE CO INC C/O STRATTON & TEMPLE & LANDGRAF 77 W WACKER DR #4400 CHICAGO IL 60601-1681		UNKNOWN
14	03-12676	03-12676	174	EXPUNGE. DUPLICATIVE OF CLAIM NO. 174
GARRISON & SWEDENBERG 2718 63RD ST DOWNERS GROVE IL 60546-1663		T & D MEDRECH & MARY & MARK BENO ET A LANDS RATH & COBB LLP 919 MARKET ST #600 WILMINGTON DE 19801		\$300,000.00 UNLIQUIDATED

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

**In re: Met-Coil Systems Corporation  
OMNIBUS 3: EXHIBIT A - DUPLICATE CLAIMS**

Creditor Name and Address		Claim To Be Expunged		Surviving Claim		Reason For Proposed Disallowance			
Case No	Claim Number	Total Claims Dollars*	Surviving Creditor Name and Address	Case No	Claim Number	Total Claims Dollars*			
15	PRINGEL 6417 MAXWELL DR WOODRIDGE IL 60517-1330	03-12676	107	BLANK	T & D MEJDRECH & MARY & MARK BENO ET A LANDIS RATH & COBB LLP 919 MARKET ST #600 WILMINGTON DE 19801	03-12676	174	UNKNOWN UNLIQUIDATED	EXPUNGE. DUPLICATIVE OF CLAIM NO. 174
<b>Total Claims Expense</b>		15	<b>Total Dollars Expunged:</b>	\$100,332,213.45	<b>Total Claims Remaining:</b>		10	<b>Total Dollars Remaining</b>	\$50,032,240.69

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

**EXHIBIT B**

**UNSUPPORTED CLAIMS**

**In re: Met-Coil Systems Corporation  
OMNIBUS 3: EXHIBIT B - UNSUPPORTED CLAIMS**

	Creditor Name / Address	Case Number	Claim Number	Docketed Claim Date	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
1	BECK, DAVID & S&RA 11760 EDEN RD LAWTONS NY 14091	03-12676	125	10/27/2003	BLANK	(U)	EXPUNGE
2	BERNSTEIN COFFEY, JAMIE S 4731 SAINT JOSEPH CREEK RD APT 5A LISLE IL 60532-1823	03-12676	155	11/6/2003	\$60.00	(U)	EXPUNGE
3	BOURN, HARRY J 6135 KINGSTON AVE LISLE IL 60532-3155	03-12676	260	11/19/2003	\$50,000.00	(U)	EXPUNGE
4	BTM CORPORATION 300 DAVIS RD MARYSVILLE MI 48040-1996	03-12676	69	10/17/2003	\$7,006.28	(U)	EXPUNGE. NOT SIGNED
5	CICHA, ROBERT J 5624 LINCOLN AVE LISLE IL 60532-2608	03-12676	145	11/5/2003	BLANK	(U)	EXPUNGE
6	GARRISON & SWEDENBERG 2719 63RD ST DOWNERS GROVE IL 60516-1663	03-12676	129	10/29/2003	\$300,000.00	(U)	EXPUNGE
7	HILL ENGINEERING INC C/O NANCY A PETERMAN ESQ GREENBERG TRAUJIG PC 77 WEST WACKER DR #2400 CHICAGO IL 60601	03-12676	230	11/14/2003	\$589,956.00	(U)	EXPUNGE
8	HUEBNER, PETER C/O FRED HOPKE 90 WOODBRIDGE CENTER DR WILENTZ GOLDMAN & SPITZER WOODBRIDGE NJ 07095-1183	03-12676	83	10/16/2003	BLANK	(U)	EXPUNGE. NO SUPPORTING DOCUMENTATION
9	IVANOV, LINA C/O LAWRENCE ROSENBLATT ESQ ROSENBLATT FRASCIELLO & KNIPPING- DIAZ PC 4791 BROADWAY NEW YORK NY 10034-4943	03-12676	167	11/10/2003	\$15,500,000.00	(S)	EXPUNGE
10	KOFF, VICTORIA T 716 HITCHCOCK AVE LISLE IL 60532-2408	03-12676	53	10/10/2003	BLANK	(U)	EXPUNGE

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

\*\* (A) - Administrative  
(P) - Priority

(S) - Secured  
(U) - Unsecured

(T) - Total



**In re: Met-Coil Systems Corporation  
OMNIBUS 3: EXHIBIT B - UNSUPPORTED CLAIMS**

	Creditor Name / Address	Case Number	Claim Number	Docketed Claim Date	Total Claim Dollars*	Claim Class**	Reason for Proposed Disallowance
11	MURPHY, KEVIN K 5819 ELM ST LISLE IL 60532-2729	03-12876	249	11/14/2003	UNKNOWN	(U)	EXPUNGE
			MET-COIL SYSTEMS CORPORATION				
12	NEW ENGLAND HVAC SERVICES CORP C/O SMITH & DORAN PC 60 WASHINGTON ST MORRISTOWN NJ 07960-8859	03-12876	121	10/27/2003	\$800,000.00	(U)	EXPUNGE
			MET-COIL SYSTEMS CORPORATION				
13	PARRILLO, GERALDINE 72 SALTER PL BELLEVILLE NJ 07109-1127	03-12876	81	10/16/2003	\$600.00	(P)	EXPUNGE
			MET-COIL SYSTEMS CORPORATION				
14	PARRILLO, STEVEN 72 SALTER PL BELLEVILLE NJ 07109-1127	03-12876	82	10/16/2003	\$600.00	(P)	EXPUNGE
			MET-COIL SYSTEMS CORPORATION				
15	ROM, RUDOLPH A 6704 WESTMORELAND DR WOODRIDGE IL 60517-1612	03-12876	166	11/8/2003	\$186.75	(U)	EXPUNGE
			MET-COIL SYSTEMS CORPORATION				
16	STUCKO, DENIS P 2528 MITCHELL DR WOODRIDGE IL 60517-1622	03-12876	146	11/5/2003	BLANK	(U)	EXPUNGE
			MET-COIL SYSTEMS CORPORATION				
17	WILLIAMS, ROGER C/O FARHAN YOUNUS 200 W JACKSON BLVD LOUIS G ATSAVES LTD CHICAGO IL 60606-8910	03-12876	47	10/10/2003	\$76,000.00	(U)	EXPUNGE
			MET-COIL SYSTEMS CORPORATION				

<b>Totals:</b>	\$15,500,000.00	(S)
	\$1,200.00	(P)
	\$1,832,211.03	(U)

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

\*\* (A) - Administrative  
(P) - Priority

(S) - Secured  
(U) - Unsecured

(T) - Total

**EXHIBIT C**

**SUPERSEDED CLAIMS**

**In re: Met-Coll Systems Corporation**  
**OMNIBUS 3: EXHIBIT C - SUPERSEDED CLAIMS**

Creditor Name and Address	Claim To Be Expunged			Surviving Creditor Name and Address	Surviving Claim		Reason For Proposed Disallowance	
	Case No	Claim Number	Total Claims Dollars*		Claim Number	Total Claims Dollars*		
1 BDI ATTN ANDREA MOELLER PO BOX 936 WATERLOO IA 50704	03-12676	104	\$53,873.95	BDI ATTN ANDREA MOELLER PO BOX 936 WATERLOO IA 50704	03-12676	140	\$51,703.81	EXPLUNGE, AMENDED BY CLAIM NO. 00140
<b>Total Claims Expunge</b> 1			<b>Total Dollars Expunged:</b> \$53,873.95	<b>Total Claims Remaining:</b> 1		<b>Total Dollars Remaining</b> \$51,703.81		

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

**EXHIBIT D**

**LATE-FILED CLAIMS**

**In re: Met-Coil Systems Corporation  
OMNIBUS 3: EXHIBIT D - LATE FILED CLAIMS**

Creditor Name / Address	Case Number	Claim Number	Docketed Claim Date	Total Claim Dollars*	Claim Class**	Reason For Proposed Disallowance
1 CARLTON BATES COMPANY PO BOX 192320 LITTLE ROCK AR 72219	03-12676	259	11/21/2003	\$496.70	(U)	EXPUNGE
		MET-COIL SYSTEMS CORPORATION				
2 HUPP ELECTRIC MOTORS PO BOX 585 CEDAR RAPIDS IA 52406-0585	03-12676	262	11/19/2003	\$1,053.56	(U)	EXPUNGE
		MET-COIL SYSTEMS CORPORATION				
3 LABOR READY INC THOMAS G MILAZZO ESQ 3836 SOUTH L-10 SERVICE RD WEST STE 300 METAIRIE LA 70001	03-12676	257	11/19/2003	\$4,542.00	(U)	EXPUNGE
		MET-COIL SYSTEMS CORPORATION				
4 ROBERT J CICHA & CO ROBERT J CICHA CPA 5624 LINCOLN AVE LISLE IL 60532-2608	03-12676	263	11/24/2003	\$15,000.00	(U)	EXPUNGE
		MET-COIL SYSTEMS CORPORATION				
5 US NAMEPLATE COMPANY HWY 30 WEST MT VERNON IA 52314	03-12676	261	11/19/2003	\$176.96	(U)	EXPUNGE
		MET-COIL SYSTEMS CORPORATION				
6 WILSON TOOL INTERNATIONAL INC IOWA PRECISION 5480 6TH ST SW CEDAR RAPIDS IA 52404-4614	03-12676	250	11/17/2003	\$6,459.19	(U)	EXPUNGE
		MET-COIL SYSTEMS CORPORATION				
<b>Totals:</b>				<b>\$27,727.41</b>	<b>(U)</b>	

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

\*\* (A) - Administrative  
(P) - Priority

(S) - Secured  
(U) - Unsecured

(T) - Total

**EXHIBIT E**

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

**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.	)	
_____	)	

**DECLARATION OF CHARLES F. KUONI, III  
OF MET-COIL SYSTEMS CORPORATION IN SUPPORT OF DEBTOR'S  
THIRD OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO CERTAIN CLAIMS  
PURSUANT TO SECTION 502 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 President and Chief Executive Officer of Debtor Met-Coil Systems Corporation.
2. I make this declaration in connection with the Debtor's Third Omnibus Objection (Non-Substantive) To Certain Claims Pursuant To Section 502 Of The Bankruptcy Code, Rule 3007 Of The Federal Rules Of Bankruptcy Procedure and 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 the Debtor's Chapter 11 case. I am generally 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.

**Duplicate Claims**

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

**Unsupported Claims**

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

**Superseded Claims**

7. I have reviewed each of the claims identified on Exhibit C to the Objection (the "Superseded Claims"), the claims register being maintained in this case and the facts and circumstances set forth in the Objection regarding such Superseded Claims. Based upon this review, I submit that the facts and circumstances set forth in the Objection are true and accurate to

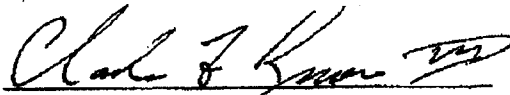


the best of my knowledge, information and belief, and that the Superseded Claims should be disallowed in full and expunged.

Late-Filed Claims

8. I have reviewed each of the claims identified on Exhibit D to the Objection (the "Late-Filed Claims"), the claims register being maintained in this case and the facts and circumstances set forth in the Objection regarding such Late-Filed 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 Late-Filed Claims 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 5, 2003.



Charles F. Kuoni, III  
Met-Coil Systems Corporation

**EXHIBIT F**

**PROPOSED FORM OF ORDER**

**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.	)	
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**ORDER DISALLOWING AND EXPUNGING CERTAIN CLAIMS  
(RE: THIRD OMNIBUS OBJECTION (NON-SUBSTANTIVE) D.I. \_\_\_\_\_)**

Upon the third omnibus objection (non-substantive) (D.I. \_\_\_\_\_) (the "Objection") of the debtor and debtor in possession in the above-captioned case (collectively, the "Debtor"), requesting an Order pursuant to § 502 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007 of the Bankruptcy Rules and Rule 3007-1 of the Local Rules, disallowing in full and expunging the Claims listed on Exhibits A, B, C and D to the Objection; and upon the Declaration of Charles F. Kuoni, III in support of the Objection; and upon all other documentation filed in connection with the Objection and the Claims; and notice of the Objection having been given to the Office of the United States Trustee, the Committee, the Debtor's post-petition lender, each of the parties listed on Exhibits A, B, C and D to the Objection, and all other parties requesting notice pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure; and it appearing that no further notice is required; and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT:**

1. The Objection is GRANTED with respect to each of the claims listed on Exhibits A, B, C and D attached to the Objection.

2. Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Objection.

3. Each of the Duplicate Claims identified on Exhibit A to the Objection is hereby disallowed in full and expunged.

4. Each of the Unsupported Claims identified on Exhibit B to the Objection is hereby disallowed in full and expunged.

5. Each of the Superseded Claims identified on Exhibit C to the Objection is hereby disallowed in full and expunged.

6. Each of the Late-Filed Claims identified on Exhibit D to the Objection is hereby disallowed in full and expunged.

Dated: Wilmington, Delaware  
January \_\_\_\_, 2003

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THE HONORABLE MARY F. WALRATH  
CHIEF UNITED STATES BANKRUPTCY JUDGE