

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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

**MESTEK, INC.'S MOTION FOR ENTRY OF ORDER
SHORTENING TIME REGARDING MOTION FOR ENTRY OF ORDER APPROVING
STIPULATION BY AND BETWEEN DEBTOR,
OFFICIAL COMMITTEE OF UNSECURED CREDITORS
AND MESTEK, INC. EXTENDING INVESTIGATIVE PERIOD**

Mestek, Inc. ("**Mestek**"), hereby files this motion (the "**Motion**") for entry of an Order shortening time regarding motion (the "**Motion Approving the Stipulation**") for entry of order approving stipulation (the "**Stipulation**") by and among Met-Coil Systems Corporation, debtor and debtor in possession herein (the "**Debtor**"), Official Committee of Unsecured Creditors (the "**Committee**") and Mestek, extending the Investigative Period (as defined below). In further support of this Motion, Mestek respectfully represents as follows:

1. The Motion Approving the Stipulation seeks an Order from this Court approving the Stipulation and authorizing Mestek to extend the period of time for the Debtor and the Committee to investigate Potential Causes of Action (as defined below) against it from January 12, 2004 through March 18, 2004.

2. Paragraph 22 of the Final DIP Order states that:

the grant of the Adequate Protection Liens to the Pre-Petition Lender shall be without prejudice to the right, if any, of the Committee, any subsequently appointed Committee, the Debtor or any other party in interest to seek an order: (i) disallowing the claims of the Pre-Petition Lender; (ii) avoiding any security or collateral interest in the assets of the Debtor claimed by the Pre-Petition Lender in the Pre-Petition Collateral; (iii) modifying the amount, validity, priority or extent of the pre-petition liens, or the pre-petition claims; or (iv) providing any other relief of any type or nature whatsoever, legal or equitable, against the Pre-Petition

Lender or otherwise permitting recovery from the Pre-Petition Lender on account of its relationship with the Debtor arising under, relating to or in connection with the pre-petition financing (the “**Potential Causes of Action**”), provided however, that any such objection, other action or other relief against the Pre-Petition Lender shall be filed, brought or commenced before January 12, 2004 (the “**Investigative Period**”).

3. By the Motion Approving the Stipulation, Mestek is requesting that this Court approve the Stipulation, which extends from January 12, 2004 to March 18, 2004, the period during which the Committee and the Debtor may conduct an investigation of the Potential Causes of Action. It is important to the Debtor and the Committee that the right to investigate Potential Causes of Action be extended and preserved for the benefit of the estate.

4. Pursuant to Local Bankruptcy Rule 9006-1(c), Mestek is required to provide fifteen (15) days notice of the Motion Approving the Stipulation. Such time may be shortened upon the showing of exigent circumstances pursuant to Local Bankruptcy Rule 9006-1(e).

5. Given the holidays, Mestek, the Debtor and the Committee were not able to finalize the Stipulation and the related Motion Approving the Stipulation in order to satisfy Local Rule 9006-1(c) and have the Motion Approving the Stipulation set for hearing on January 20, 2004. It is important to the Debtor and the Committee that the Motion Approving the Stipulation be heard by this Court on January 20, 2004. Unless the Motion Approving the Stipulation is heard on January 20, 2004, the Debtor and the Committee will not be certain that the Investigative Period has been extended to March 18, 2004.

6. Accordingly, Mestek seeks an Order from this Court (i) shortening the notice period so that the Motion Approving the Stipulation is heard at the omnibus hearing scheduled for January 20, 2004 at 10:30 a.m. Eastern Time and (ii) requiring that objections to the Motion Approving the Stipulation be filed with the Court and served in accordance with the attached Notice of Motion on or before January 15, 2003.

7. Granting this Motion would result in the shortening of the notice period by only two (2) days and would not greatly impact the rights of any parties in interest with respect to the Motion Approving the Stipulation.

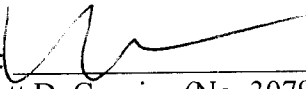
8. Considering the nature of the relief requested in the Motion Approving the Stipulation, Mestek respectfully submits that the notice period described above is sufficient to provide parties in interest an opportunity to review and, if necessary, respond to the Motion Approving the Stipulation. Mestek submits that shortening the time to respond will not prejudice the rights of any party in interest.

9. This Motion, the Notice of Motion and the Motion Approving the Stipulation have been served upon the parties as set forth in the Motion.

WHEREFORE, Mestek respectfully requests that this Court enter an Order (i) shortening the time for the hearing on the Motion Approving the Stipulation; (ii) setting the objection date for January 15, 2004; and (iii) granting such other and further relief this Court deems appropriate under the circumstances.

Dated: January 7, 2004

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