

**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. 296, 425 and 437

**DEBTOR’S MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF ITS FIRST
SUBSTANTIVE OMNIBUS OBJECTION TO PROOFS OF CLAIM NUMBERS 172,
184, 185, 186, 187, 202, 203, 204, 205, 212, 218, 220 222, 223, 224, 226, 227, 235, 240
AND 246 FOR CONTRIBUTION AND RULE 11 SANCTIONS [D. I. 296]**

Met-Coil Systems Corporation, debtor and debtor in possession in the above-captioned case (the "**Debtor**"), hereby moves (the "**Motion**") for leave to file the attached Debtor’s Reply (the "**Reply**") In Support of its First Substantive Omnibus Objection to Proofs of Claim Numbers 172, 184, 185, 186, 187, 202, 203, 204, 205, 212, 218, 220, 222, 223, 224, 226, 227, 235, 240 and 246 For Contribution and Rule 11 Sanctions [D. I. 296]. In support of its Motion, the Debtor states as follows:

1. On November 25, 2003, the Debtor filed the Debtor's First Substantive Omnibus Objection to Proofs of Claim Numbers 172, 184, 185, 186, 187, 202, 203, 204, 205, 212, 218, 220, 222, 223, 224, 226, 227, 235, 240 and 246 For Contribution and Rule 11 Sanctions [D. I. 296] (the "**Objection**").

2. On December 26, 2003, Arrow Gear Company, Ames Supply Co., Bison Gear and Engineering Corp., Flexible Steel Lacing Company, Lindy Manufacturing Company, Magnetrol International, Inc., Molex Incorporated, Morey Corporation, Rexnord Corporation and Tricon Industries (the "**Third-Party Claimants**") filed the Response to Objection to

Debtor's First Substantive Omnibus Objection to Proofs of Claim 172, 184, 185, 186, 187, 202, 203, 204, 205, 212, 218, 220, 222, 223, 224, 226, 227, 235, 240 and 246 [D. I. 425] (the "**Third-Party Claimants' Response**"). On December 29, 2003 William Helwig ("**Helwig**," and collectively with the Third-Party Claimants, the "**Claimants**") filed that certain Response in Opposition to Debtor's First Substantive Omnibus Objection to Proof of claim 224 [D.I. 437] (the "**Helwig Response**," and collectively with the Third-Party Claimants' Response, the "**Responses**").

3. The Court originally scheduled the Objection to be heard on January 7, 2003 at 2:00 p.m. ET (the "**Hearing**"). The Hearing has been continued to January 20, 2003 at 10:30 a.m. ET.

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 Responses that are inaccurate and incorrect as a matter of fact and law and to address certain issues raised by the Claimants for the first time in their Responses that could not have been reasonably anticipated upon filing of the Debtor's Objection. 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 claims asserted by the Claimants.

6. Finally, counsel for the Claimants have received expedited service of this Request and the attached Reply and as such, and otherwise, will not be prejudiced by the relief requested herein.

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

Dated: January 13, 2003

MORRIS, NICHOLS, ARSHT & TUNNELL

/s/ Jason W. Harbour

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Counsel for Debtor and Debtor In Possession

SO ORDERED, this _____ day of January, 2004

UNITED STATES BANKRUPTCY JUDGE