

**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.)	Hearing Date: To be determined

**CERTIFICATION OF COUNSEL REGARDING MOTION FOR PROTECTIVE ORDER
RELATED TO DISCOVERY REQUESTS OF MEJDRECH PLAINTIFFS**

The undersigned counsel for Professor Eric D. Green, the legal representative for future claimants (the “Future Claimants’ Representative” or “FCR”), in the chapter 11 case of the above captioned debtor and debtor in possession (the “Debtor”), hereby certifies that an impasse has been reached with regard to the request for production of documents and notice of deposition of the FCR (the “Discovery Requests”) sent to the FCR by Theresa Mejdrech, Daniel Mejdrech, Mary Beno and Mark Beno, individually and on behalf of all persons similarly situated (collectively, the “Mejdrech Plaintiffs”). As a result of the impasse, the counsel for the FCR has filed the attached Motion for Protective Order (the “Motion”) seeking the entry of a protective order pursuant to Rule 7026(c) of the Federal Rules of Bankruptcy Procedure.

The Discovery Requests were sent to the FCR’s counsel via facsimile at 5:22 p.m. on Friday, February 27, 2004, leaving one business day for the FCR to respond to the Mejdrech Plaintiffs’ request. In spite of the abbreviated time frame, the counsel for the FCR has been in communication with the counsel for the Mejdrech Plaintiffs in an effort to resolve the dispute. The counsel for the FCR has attempted to negotiate with the counsel for the Mejdrech Plaintiffs to further define the scope of the Discovery Requests, explain the confidential nature of the information sought in the Discovery Requests, attempt to persuade the Mejdrech Plaintiffs to

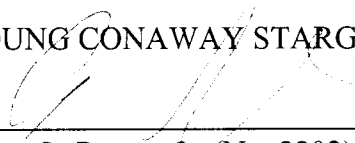
withdraw the Discovery Requests, and resolve other various issues in preparation of the March 8, 2004 hearing.

Although these efforts largely failed, the FCR has agreed to appear, as a gesture of good faith, for a deposition in Washington, D.C. on March 2, 2004, beginning at 10:00 a.m. and lasting for two hours, to address in general terms, without divulging the substance of any settlement discussions or privileged communications, the process of forming the TCE trust. Notwithstanding the FCR's cooperation, the Mejdrech Plaintiffs have continued to assert an intention to seek this Court's authority to compel the FCR to fully submit to the Discovery Requests.

Therefore, the undersigned counsel hereby certifies that efforts to consensually resolve the foregoing discovery dispute with the Mejdrech Plaintiffs have been unsuccessful, and respectfully submits that the filing of the Motion seeking the Court's protection is necessary.

Dated: March 2, 2004

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