

**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

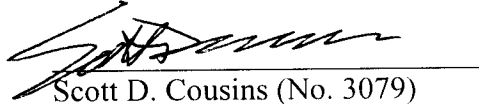
**CERTIFICATION OF COUNSEL REGARDING MOTION FOR PROTECTIVE ORDER
RELATED TO DISCOVERY REQUESTS OF MEJDRECH PLAINTIFFS**

The undersigned counsel for Mestek, Inc. (“Mestek”) in the chapter 11 case of the above-captioned debtor and debtor-in-possession (the “Debtor”), hereby certifies pursuant to D.Del. LR 7.1.1 that an impasse has been reached with regard to the subpoenas and notice of deposition (the “Discovery Requests”) issued to Mestek, Met-Coil, and the Future Claimants’ Representative 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, undersigned counsel has filed the attached Mestek, Inc.’s Motion to Quash Subpoenas Issued to Mestek, Inc. and to the Future Claimants’ Representative and for a Protective Order Barring Discovery from the Debtor (the “Motion”) seeking the entry of a protective order pursuant to Rule 7026(c) of the Federal Rules of Bankruptcy Procedure.

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 3, 2004

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