

**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: April 12, 2004 at 4:00 p.m. (Eastern Time)**
_____) **Hearing Date: April 19, 2004 at 10:30 a.m. (Eastern Time)**

**DEBTOR'S FOURTH 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 and C, 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 D 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, 2004, 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 and C (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 and C 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 and C, 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 and C, 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. Superseded Claims – Exhibit B

12. The Debtor objects to each of the Claims identified on the attached Exhibit B (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 B. 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 B 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 B 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.

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 Therefore, for all of the foregoing reasons, each of the Superseded Claims identified on Exhibit B should be disallowed in full and expunged.

C. Late-Filed Claims – Exhibit C

14. The Debtor objects to each of the Claims identified on the attached Exhibit C (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 C. 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.

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

RESERVATION OF RIGHTS

16. 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

17. 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 and C, and all other parties that requested notice pursuant to Rule 2002 of the Bankruptcy Rules. 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 E disallowing in full each of the Claims identified on Exhibits A, B and C and (ii) granting such other and further relief as is just and proper.

Dated: Wilmington, Delaware
March 4, 2004

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

/s/ Kathryn A. Pamerter

Ronald Barliant (Illinois ARDC #0112984)
Kathryn A. Pamerter (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)
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