

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<p>-----</p> <p>In re:</p> <p>WELDED CONSTRUCTION, L.P., <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p> <p>-----</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Chapter 11</p> <p>Case No. 18-12378 (KG)</p> <p>(Jointly Administered)</p> <p>Objection Deadline: December 3, 2018 at 4:00 p.m. (ET)</p> <p>Hearing Date: December 20, 2018 at 2:00 p.m. (ET)</p>
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**APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
OF WELDED CONSTRUCTION, L.P., *ET AL.*, FOR ENTRY OF AN ORDER
AUTHORIZING THE COMMITTEE TO RETAIN AND EMPLOY BLANK ROME LLP
AS ITS COUNSEL PURSUANT TO 11 U.S.C. §§ 328 AND 1103, FED. R. BANKR. P. 2014,
AND LOCAL R. 2014-1 *NUNC PRO TUNC* TO OCTOBER 30, 2018**

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 bankruptcy cases (the “Chapter 11 Cases”) of the above-captioned debtors and debtors in possession (the “Debtors”) hereby files this application (the “Application”) for entry of an order authorizing the retention and employment of Blank Rome LLP (“Blank Rome”) as counsel for the Committee *nunc pro tunc* to October 30, 2018, pursuant to sections 328(a) and 1103 of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2014-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court District of Delaware (the “Local Rules”), and the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases (the “U.S. Trustee Guidelines”). In support of this Application, the Committee relies upon (i) the Verified Statement of John E. Lucian (the “Verified Statement”) attached hereto as **Exhibit A** and incorporated herein

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Welded Construction, L.P. (5008) and Welded Construction Michigan, LLC (9830). The mailing address for each of the Debtors is 26933 Eckel Road, Perrysburg, OH 43551.



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by reference, and (ii) the Declaration of Walter Curtis Keal, as representative of Ohio Machinery Co., attached hereto as **Exhibit B** and incorporated herein by reference, and respectfully states as follows:

JURISDICTION AND VENUE

1. Pursuant to 28 U.S.C. §§ 157 and 1334, this Court has jurisdiction to consider and grant the relief requested herein. A proceeding to consider and grant such relief is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought herein are sections 328(a) and 1103(a) of the Bankruptcy Code. Relief is also proper pursuant to Bankruptcy Rule 2014 and Local Rule 2014-1. Compensation will be in accordance with sections 330 and 331 of the Bankruptcy Code.

2. Pursuant to Local Rule 9013-1(f), the Committee consents to the entry of a final judgment or order with respect to the Application if it is determined that the United States Bankruptcy Court for the District of Delaware (the “Court”), absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

BACKGROUND

3. On October 22, 2018 (the “Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 11 the Bankruptcy Code. Pursuant to sections 1107 and 1108 of the Bankruptcy Code, the Debtors continue to manage and operate their businesses and property as debtors in possession. No trustee or examiner has been appointed in these cases.

4. On October 30, 2018, the Office of United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed the Committee pursuant to section 1102(a)(1) of the Bankruptcy Code. The Committee is currently comprised of the following seven (7) members: (i)

Ohio Machinery Co.; (ii) Cleveland Brothers Equipment Co., Inc.; (iii) United Piping, Inc.; (iv) PipeLine Machinery International, LP; (v) Earth Pipeline Services, Inc.; (vi) IUOE and Pipe Line Employers Health & Welfare Fund; and (vii) Schmid Pipeline. See Docket No. 128.

5. Subsequent to its formation, on October 30, 2018, the Committee selected Blank Rome as its proposed lead counsel in these Chapter 11 Cases. By separate application, the Committee is seeking to employ and retain Teneo Capital LLC as its financial advisor and investment banker.

RELIEF REQUESTED AND BASIS THEREFOR

6. By this Application, pursuant to section 1103(a) of the Bankruptcy Code and Bankruptcy Rule 2014, the Committee requests entry of the proposed order attached hereto as **Exhibit C**, approving the employment and retention of Blank Rome, *nunc pro tunc* to October 30, 2018, as its lead counsel in connection with these Chapter 11 Cases.

7. As required by the U.S. Trustee Guidelines, the Committee responds to the questions set forth in Section D.1 of the U.S. Trustee Guidelines as follows:

- (a) Blank Rome did not agree to a variation of its standard or customary billing arrangement for this engagement;
- (b) None of the professionals included in this engagement have varied their rate based on the geographic location of these Chapter 11 Cases;
- (c) Blank Rome did not represent the Committee prior to the Petition Date; and
- (d) The Committee's professionals intend to negotiate a budget with the Debtors, their lender and the Committee as part of any final order approving the Debtors' debtor-in-possession financing. The Committee has approved Blank Rome's proposed hourly billing rates and staffing plan. The Blank Rome attorneys and paraprofessionals staffed on these cases, subject to modification depending upon further development, are as set forth below.²

² Blank Rome intends to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the U.S. Trustee Guidelines in connection with the Application and any interim and final fee applications to be filed by Blank Rome in these Chapter 11 Cases. The foregoing was

8. With offices in New York, Pennsylvania, Delaware and other locations, Blank Rome is a nationally recognized law firm with extensive experience and expertise in bankruptcy and reorganization proceedings. The Committee seeks the employment of Blank Rome to represent it as counsel and perform services for the Committee in connection with carrying out its fiduciary duties and responsibilities under the Bankruptcy Code consistent with section 1103(c) and other provisions of the Bankruptcy Code. Attorneys at Blank Rome have broad-based experience and a national reputation in bankruptcy and reorganization proceedings. Through Blank Rome, the Committee will have the benefit of such knowledge and experience, as well as the ability to call upon other attorneys within Blank Rome with expertise in other specialized areas relevant to these Chapter 11 Cases, as set forth more fully below.

9. Pursuant to section 1103(a) of the Bankruptcy Code, the Committee requests that this Court approve the employment of Blank Rome as its counsel to, without limitation:

- (a) Provide the Committee with legal advice in relation to the Chapter 11 Cases;
- (b) Attend the meetings of the Committee;
- (c) Assist, advise, and represent the Committee in understanding its powers and its duties under the Bankruptcy Code and the Bankruptcy Rules and in performing other services as are in the interests of those represented by the Committee;
- (d) Assist, advise, and represent the Committee in its consultations with the Debtors regarding the administration of these cases, including conferring with the Debtors' management, counsel and any other retained professionals;
- (e) Assist, advise, and represent the Committee in analyzing the Debtors' assets and liabilities, investigating the extent and validity of liens and participating in and reviewing any proposed asset sales, any asset dispositions, financing arrangements and cash collateral proceedings;

based exclusively on the facts and circumstances of the Debtors' Chapter 11 Cases and Blank Rome fully reserves the right to object to such requirements, or any other requirements contained in the U.S. Trustee Guidelines in future cases should it determine that it is appropriate to do so.

- (f) Assist, advise, and represent the Committee in any manner relevant to reviewing and determining the Debtors' rights and obligations under leases and other executory contracts;
- (g) Assist, advise, and represent the Committee in investigating the acts, conduct, assets, liabilities, and financial condition of the Debtors, the Debtors' operations and the desirability of the continuance of any portion of those operations, and any other matters relevant to these cases or to the formulation of a plan;
- (h) Review and investigate prepetition transactions in which the Debtors and/or their insiders were involved;
- (i) Assist, advise, and represent the Committee with regards to avoidance actions and claims against directors, officers, affiliates and other parties;
- (j) Advise the Committee as to the implications regarding all of the Debtors' activities and motions before this Court;
- (k) Prepare various motion and pleadings to be submitted to the Court for consideration and file appropriate motion and pleadings on behalf of the Committee;
- (l) Review and analyze the Debtors' professionals' work product and report to the Committee; and
- (m) Provide such other services to the Committee as may be necessary in these cases.

10. Blank Rome has advised the Committee that it intends to apply to the Court for compensation and reimbursement of expenses in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the U.S. Trustee Guidelines, and any administrative compensation order entered in these cases. The proposed rates of compensation, subject to final Court approval, are the customary hourly rates in effect when services are performed by the attorneys, paraprofessionals and staff who provide services to the Committee.

11. Subject to the approval of this Court, Blank Rome will charge the Committee for its legal services on an hourly basis in accordance with its ordinary and customary rates, which are in effect on the date the services are rendered, subject to periodic adjustment. The Committee has

been advised by Blank Rome that the current hourly rates, which will be charged in respect of the primary members of the Blank Rome engagement team for the Committee, are as follows:

<u>Timekeeper</u>	<u>Title</u>	<u>Standard Hourly Rate</u>
Michael B. Schaedle	Partner	\$780.00
John E. Lucian	Partner	\$690.00
Josef W. Mintz	Associate	\$535.00
Jose F. Bibiloni	Associate	\$355.00
Christopher A. Lewis	Paralegal	\$330.00

From time to time, other Blank Rome attorneys and paralegals may be involved in these cases as needed. The Committee has been advised by Blank Rome that its hourly rates, as of November 1, 2018 are in the ranges that follow: from \$450.00 to \$1,195.00 for partners, from \$425.00 to \$925.00 for counsel, from \$200.00 to \$655.00 for associates, and from \$180.00 to \$430.00 for paraprofessionals. The Committee further understands that the hourly rates set forth above are subject to periodic adjustments to reflect established billing practices and procedures as well as economic and other conditions, which adjustments typically occur on January 1 of each year, but may also occur at other times during the calendar year. The Committee has consented to such ordinary rate increases.

12. In addition to the hourly rates previously referenced, Blank Rome customarily charges clients for actual and necessary costs of support services the firm provides in connection with a representation, including, without limitation, court reporters, transcripts, computerized research, filing fees, photocopying charges, long distance telephone calls, facsimile transmissions, messengers, courier mail, secretarial overtime, temporary services, travel, lodging, and catering for meetings. Some of these services are provided by Blank Rome, in which case the charges are set by Blank Rome, and others are provided by third party service providers, in which case the charges

are set by the providers. Blank Rome will charge the cost of these expenses in a manner and at rates consistent with charges generally made to the firm's other clients. Blank Rome will not charge greater than \$0.10 per page for standard photocopying and duplication. All such charges for which Blank Rome seeks payment are subject to Court approval and/or pursuant to any administrative procedures established by order of the Court.

13. The Committee has been advised that Blank Rome will use every effort to staff the engagement in a cost-effective manner, including utilizing the firm's paralegal assistants to handle those aspects of these cases that can best be managed by a paralegal.

14. Based upon the Verified Statement, the Committee is satisfied that (i) Blank Rome represents no interest adverse to the Committee, the Debtors, their estates, or any other party in interest in the matters upon which it is to be engaged and that its employment is in the best interest of the estates, (ii) Blank Rome has no connection with the U.S. Trustee or any other person employed in the office of the U.S. Trustee, and (iii) Blank Rome has not been paid any retainer against which to bill fees and expenses. To the best of the Committee's knowledge, Blank Rome has no connection with creditors or any other party in interest except as otherwise set forth in the Verified Statement.

15. The Committee requests approval of the employment of Blank Rome *nunc pro tunc* to October 30, 2018. Such relief is appropriate by the circumstances presented by these Chapter 11 Cases. The Committee's selection of Blank Rome on October 30, 2018 necessitated that Blank Rome immediately commence work on time-sensitive matters and promptly devote substantial resources to the Debtors' cases pending submission and approval of this Application.

16. The Committee believes that the employment of Blank Rome is necessary and in the best interests of the estates, enabling the Committee to carry out its fiduciary duties owed to creditors under the Bankruptcy Code.

NOTICE

17. Notice of this Application has been provided to (i) the Office of the United States Trustee for the District of Delaware; (ii) counsel to the Debtors; (iii) counsel to the Debtors' postpetition lender; and (iv) all parties requesting notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested herein, the Committee submits that no other or further notice is necessary.

[Remainder of page intentionally left blank.]

CONCLUSION

WHEREFORE, the Committee respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit C**, authorizing the employment of Blank Rome as counsel to the Committee effective as of October 30, 2018, pursuant to sections 328 and 1103 of the Bankruptcy Code, as well as Bankruptcy Rule 2014 and Local Rule 2014-1, with compensation and reimbursement of expenses to be paid pursuant to sections 330 and 331 of the Bankruptcy Code, and in accordance with any administrative procedures established by order of the Court, and for such other and further relief as the Court deems just and proper.

Dated: November 19, 2018

Respectfully submitted,

THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF WELDED CONSTRUCTION, L.P., ET AL.

Ohio Machinery Co., solely in its
capacity as a Committee Chairperson

By: /s/ Walter Curtis Keal

Name: Walter Curtis Keal

Title: Credit Manager

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WELDED CONSTRUCTION, L.P., *et al.*,¹

Debtors.

)
) Chapter 11

)
) Case No. 18-12378 (KG)

)
) (Jointly Administered)

)
) **Objection Deadline: December 3, 2018 at 4:00 p.m. (ET)**

)
) **Hearing Date: December 20, 2018 at 2:00 p.m. (ET)**

**NOTICE OF APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF WELDED CONSTRUCTION, L.P., ET AL., FOR ENTRY OF AN
ORDER AUTHORIZING THE COMMITTEE TO RETAIN AND EMPLOY BLANK
ROME LLP AS ITS COUNSEL PURSUANT TO 11 U.S.C. §§ 328 AND 1103, FED. R.
BANKR. P. 2014, AND LOCAL R. 2014-1 NUNC PRO TUNC TO OCTOBER 30, 2018**

PLEASE TAKE NOTICE that on November 19, 2018, the Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 bankruptcy cases of the above-captioned debtors and debtors-in-possession, filed the *Application of the Official Committee of Unsecured Creditors of Welded Construction, L.P., et al., for Entry of an Order Authorizing the Committee to Retain and Employ Blank Rome LLP as its Counsel Pursuant to 11 U.S.C. §§ 328 and 1103, Fed. R. Bankr. P. 2014, and Local R. 2014-1 Nunc Pro Tunc to October 30, 2018* (the “Application”). A copy of the Application is attached hereto.

PLEASE TAKE FURTHER NOTICE that any response or objection to the Application must be (i) filed in writing with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **December 3, 2018 at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”) and (ii) served on, so as to be received by, the undersigned proposed counsel to the Committee on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the Application is scheduled to be held on **December 20, 2018 at 2:00 p.m. (prevailing Eastern Time)** before the Honorable Kevin Gross, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom #3, Wilmington, Delaware 19801.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Welded Construction, L.P. (5008) and Welded Construction Michigan, LLC (9830). The mailing address for each of the Debtors is 26933 Eckel Road, Perrysburg, OH 43551.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND TO THE APPLICATION IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR OPPORTUNITY FOR A HEARING.

Dated: November 19, 2018
Wilmington, Delaware

BLANK ROME LLP

/s/ Jose F. Bibiloni

Josef W. Mintz (DE No. 5644)
Jose F. Bibiloni (DE No. 6261)
1201 Market Street, Suite 800
Wilmington, Delaware 19801
Telephone: (302) 425-6400
Facsimile: (302) 425-6464
Email: Mintz@BlankRome.com
JBibiloni@BlankRome.com

Michael B. Schaedle (admitted *pro hac vice*)
John E. Lucian (admitted *pro hac vice*)
One Logan Square
130 North 18th Street
Philadelphia, Pennsylvania 19103
Telephone: (215) 569-5500
Facsimile: (215) 569-5555
Email: Schaedle@BlankRome.com
Lucian@BlankRome.com

*Proposed Counsel to the Official Committee
of Unsecured Creditors of Welded
Construction, L.P., et al.*

EXHIBIT A

Verified Statement of John E. Lucian

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
WELDED CONSTRUCTION, L.P., <i>et al.</i> , ¹)	Case No. 18-12378 (KG)
Debtors.)	(Jointly Administered)
)	

**VERIFIED STATEMENT OF JOHN E. LUCIAN IN SUPPORT OF APPLICATION OF
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF WELDED
CONSTRUCTION, L.P., *ET AL.* FOR ENTRY OF AN ORDER AUTHORIZING THE
COMMITTEE TO RETAIN AND EMPLOY BLANK ROME LLP AS ITS COUNSEL
PURSUANT TO 11 U.S.C. §§ 328 AND 1103, FED. R. BANKR. P. 2014,
AND LOCAL R. 2014-1 NUNC PRO TUNC TO OCTOBER 30, 2018**

I, John E. Lucian, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am a partner in the law firm of Blank Rome LLP (“Blank Rome”), with offices at One Logan Square, 130 North 18th Street, Philadelphia, Pennsylvania 19103 and 1201 North Market Street, Suite 800, Wilmington, Delaware 19801, among other locations, and I am duly authorized to make this verified statement (the “Verified Statement”) on behalf of Blank Rome. I make this Verified Statement in support of the *Application of the Official Committee of Unsecured Creditors of Welded Construction L.P., et al., for Entry of an Order Authorizing the Committee to Employ Blank Rome LLP as Its Counsel Pursuant to 11 U.S.C. §§ 328 and 1103, Fed. R. Bankr. P. 2014, and Local R. 2014-1 Nunc Pro Tunc to October 30, 2018* (the “Application”).²

2. This Verified Statement is given in part on personal knowledge and in part on information and belief based on discussions with individuals at Blank Rome whom I consider

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Welded Construction, L.P. (5008) and Welded Construction Michigan, LLC (9830). The mailing address for each of the Debtors is 26933 Eckel Road, Perrysburg, OH 43551.

² Unless otherwise defined herein, all capitalized terms shall have the meanings ascribed to them in the Application.

reliable for the purposes of the matters discussed, and in part on reviewing records provided to me by Blank Rome colleagues and employees.

3. Blank Rome is a nationally recognized firm with extensive experience in bankruptcy and reorganization proceedings, including, without limitation, representing debtors, debtors in possession, trustees, creditors and creditors' committees, and others in chapter 11 and chapter 7 cases. Its sophisticated practice also spans many other areas of law, including, without limitation, corporate, maritime, energy, mortgage banking securities, commercial litigation, employee benefits, tax, and intellectual property matters. The firm is well qualified to represent the Official Committee of Unsecured Creditors (the "Committee") of Welded Construction, L.P. and its affiliated debtor (the "Debtors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases") as its counsel.

4. Blank Rome has examined its database of existing and former clients to determine whether it had or has any connections with parties in interest in the Chapter 11 Cases. Specifically, Blank Rome's analysis included an examination of the entities set forth on the list of potential parties in interest attached hereto as Schedule 1, which was provided by counsel to the Debtors. Blank Rome's examination process is necessarily ongoing. Accordingly, if necessary, Blank Rome will supplement this Verified Statement as appropriate. Additionally, Blank Rome has searched its database for members of the Office of the United States Trustee's Office for Region 3 involved in the Chapter 11 Cases, members of the Committee, and any Committee professionals, as set forth on Schedule 1.

5. I am advised that the entities on Schedule 1 hereto are creditors of the Debtors and/or parties in interest in the Chapter 11 Cases.³ Blank Rome represents, or in the past five years

³ Description of a party's role in the cases is not intended to nor shall it be deemed to be an admission as to the nature of any creditor's claims or to the validity of any of its filings, including without limitation, any Uniform

has represented, those entities delineated on Schedule 2 and/or certain affiliates thereof in discrete matters unrelated to the Chapter 11 Cases from time to time. Blank Rome does not represent any entity appearing on Schedule 2 or any affiliate thereof in connection with these Chapter 11 Cases.

6. Based on the database examination of the entities listed on the attached Schedule 1, we have concluded that, except as set forth above and on Schedule 2, neither I, Blank Rome, nor any partner, of counsel or associate thereof has any connection with the Debtors, their creditors or parties in interest herein, their respective attorneys and accountants, the U.S. Trustee, or any person employed in the office of the U.S. Trustee.

7. While Blank Rome has taken all reasonable steps to ascertain whether current or recent clients are creditors of the Debtors, affiliated with creditors of the Debtors, or are otherwise parties in interest, it is possible there are relationships or connections of which Blank Rome is not aware through reasonable diligence. Should Blank Rome become aware of any connections with other creditors or parties in interest, Blank Rome will supplement this Verified Statement.

8. Blank Rome has represented, represents, and in the future will likely represent debtors and creditors' committees in cases unrelated to the Debtors and these Chapter 11 Cases wherein one or more of the firms representing the Debtors or other parties-in-interest serve as or will serve as professionals.

9. Section 1103(b) of the Bankruptcy Code does not incorporate the general "disinterestedness" standard set forth in section 327(a) of the Bankruptcy Code. Notwithstanding this, Blank Rome is a "disinterested person" as that term is used and defined in 11 U.S.C. § 101(14) in that Blank Rome, its partners, of counsel and associates:

- (a) are not creditors of the Debtors, equity security holders of the Debtors, or insiders⁴ of the Debtors;
- (b) are not and were not, within 2 years before the Petition Date, directors, officers, or employees of the Debtors; and
- (c) do not have an interest materially adverse to the interest of the Debtors' estates or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors, or for any other reason.

10. Additionally, neither Blank Rome, any member of Blank Rome, any attorney who is of counsel to Blank Rome, nor any associate of Blank Rome, insofar as I have been able to ascertain:

- (a) presently represents a creditor or equity interest holder of the Debtors, or a person otherwise adverse or potentially adverse to the Debtors or the Debtors' estates on any matter that is related to the Debtors or the Debtors' estates or, except as described above, on any matter that is unrelated to the Debtors or the Debtors' estates;
- (b) except as described above, has any other connection with the Debtors, their creditors, the Office of the United States Trustee or any employee of that office or any other parties in interest; or
- (c) has any other interest, direct or indirect, which may affect or be affected by the proposed representation.

11. None of the "connections" disclosed herein are believed to be disabling conflicts under the Bankruptcy Code and applicable Federal Rules of Bankruptcy Procedure. In addition, Blank Rome will represent no entity other than the Committee in connection with the Chapter 11 Cases. (Blank Rome may represent a successor-in-interest to the Committee or the Debtors' estates pursuant to a confirmed plan in the Chapter 11 Cases).

12. As required by the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11*

⁴ The term "insider" as used herein shall have the same meaning ascribed to it in 11 U.S.C. § 101(31).

Cases, effective November 1, 2013 (the “U.S. Trustee Guidelines”), I provide responses to the questions set forth in Section D of the UST Guidelines as follows:

- a. Blank Rome did not agree to a variation of its standard or customary billing arrangement for this engagement;
- b. None of the professionals included in this engagement have varied their rate based on the geographic location of these Chapter 11 Cases;
- c. Blank Rome did not represent the Committee prior to the Petition Date; and
- d. The Committee’s professionals intend to negotiate a budget with the Debtors, their lender and the Committee as part of any final order approving the Debtors’ debtor-in-possession financing. The Committee has approved Blank Rome’s proposed hourly billing rates and staffing plan. The Blank Rome attorneys and paraprofessionals staffed on these cases, subject to modification depending upon further development, are as set forth below.⁵

13. Blank Rome has not received a retainer in connection with these Chapter 11 Cases.

14. Blank Rome has agreed to be employed by the Committee at the firm’s customary, hourly rates for comparable matters, including paralegal services, and understands that the firm’s compensation is to be paid and the expenses and costs are to be reimbursed upon application to the Court and is subject to the Court’s approval and/or pursuant to any administrative procedures established by Order of the Court. Blank Rome anticipates that the following are the core team of professionals who will perform services for the Committee and the current hourly rates that Blank Rome customarily charges for their services:

<u>Timekeeper</u>	<u>Title</u>	<u>Standard Hourly Rate</u>
Michael B. Schaedle	Partner	\$780.00
John E. Lucian	Partner	\$690.00

⁵ Blank Rome intends to make a reasonable effort to comply with the U.S. Trustee’s requests for information and additional disclosures as set forth in the U.S. Trustee Guidelines in connection with the Application and any interim and final fee applications to be filed by Blank Rome in these Chapter 11 Cases. The foregoing was based exclusively on the facts and circumstances of the Debtors’ Chapter 11 Cases and Blank Rome fully reserves the right to object to such requirements, or any other requirements contained in the U.S. Trustee Guidelines in future cases should it determine that it is appropriate to do so.

Josef W. Mintz	Associate	\$535.00
Jose F. Bibiloni	Associate	\$355.00
Christopher A. Lewis	Paralegal	\$330.00

15. From time to time, other Blank Rome attorneys and paralegals may be involved in these cases as needed. In particular, Blank Rome has expertise in certain practice areas, including in specialized areas concerning labor, pension, environmental and intellectual property law, and the Committee may elect to utilize Blank Rome's expertise with respect to these matters. The Committee has been advised by Blank Rome that its hourly rates, as of November 1, 2018 are in the ranges that follow: from \$450.00 to \$1,195.00 for partners, from \$425.00 to \$925.00 for counsel, from \$200.00 to \$655.00 for associates, and from \$180.00 to \$430.00 for paraprofessionals. Blank Rome will use every effort to staff the engagement in a cost-effective manner. The hourly rates set forth above are subject to periodic adjustments to reflect established billing practices and procedures as well as economic and other conditions, which adjustments typically occur in the spring of each year, but may also occur at other times during the calendar year.

16. Blank Rome customarily and generally charges clients for the costs of support services the firm provides in connection with a representation, including, without limitation, photocopying charges, long distance telephone calls, facsimile transmissions, messengers, courier mail, secretarial and administrative overtime and temporary services, travel, lodging and catering for meetings. Some of these services are provided by Blank Rome, in which case the charges are set by Blank Rome, and others are provided by third party service providers, in which case the charges are set by the providers. Blank Rome will charge the cost of these expenses in a manner and at rates consistent with charges generally made to the firm's other clients and consistent with

local bankruptcy rules. Blank Rome will not charge greater than \$0.10 per page for standard photocopying and duplication. All such charges for which Blank Rome seeks payment are subject to Court approval and/or pursuant to any administrative procedure established by Order of the Court.

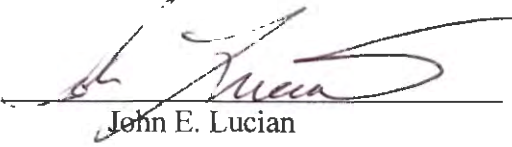
17. No agreement or understanding exists between Blank Rome and any other person (other than members, partners and employees of the firm) to share compensation received for services to be rendered in connection with this representation.

18. By reason of the foregoing, I believe that Blank Rome is eligible for employment and retention by the Committee pursuant to 11 U.S.C. §§ 328 and 1103 and applicable Bankruptcy Rules and Local Rules.

[Remainder of page intentionally left blank.]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 17, 2018



John E. Lucian

Schedule 1

Searched Parties

DEBTORS:

- Welded Construction, L.P.
- Welded Construction Michigan, LLC

CURRENT & FORMER OFFICERS & DIRECTORS

- Joseph M. St. Julian
- Jack Futch
- John Nicolson
- Stephen D. Hawkins.
- Jeff McCaig
- Rich Wall
- Matt Lutz
- Dean McDowell
- Ronald P. Gratton
- Glen P. Brock
- Emad Eldin Mohamed Khedr

GENERAL PARTNERS/LIMITED PARTNERS:

- Ohio Welded Company LLC
- McCaig Welded GP, LLC
- Bechtel Oil, Gas and Chemicals, Inc.
- McCaig US Holdings, Inc.

BANKRUPTCY PROFESSIONALS:

- Young, Conaway, Stargatt & Taylor, LLP
- Gibson Dunn & Crutcher LLP
- Zolfo Cooper, LLC

CASH MANAGEMENT BANKS:

- Huntington National Bank
- JPMorgan Chase
- M&T Bank
- Global Cash Card

UCC LIEN CLAIMANTS

- Caterpillar Financial Services
- VAR Resources, LLC
- BNP Paribas
- Huntington National Bank

LANDLORDS:

- Rexroth Equities, LP
- Board of Park Commissioners of the Friendship Park District
- 6twelve Properties, L.P. (d/b/a Eastridge Commerce Park)
- Ruth A. Miley
- Falcon Properties
- Matt Canestrone Contracting, Inc.
- Atlantis Self Storage, Inc.
- Morgantown, L.P.
- Schuylkill Economic Development Corporation
- Fox's Inc.
- Mt. Joy Holding Co.
- CFV Group LLC

INSURANCE:

- Navigators Insurance Company
- Zurich American Insurance Company
- Travelers Casualty and Surety Company of America
- Indian Harbor Insurance Company
- The Charter Oak Fire Insurance Company
- Westchester Fire Insurance Company
- Gemini Insurance Company
- Great American Assurance Company
- The Ohio Casualty Insurance Company
- Liberty Mutual Insurance Company
- McGriff, Seibels & Williams, Inc.

- Prime Rate Premium Finance Corporation, Inc.

SURETY:

- Berkshire Hathaway
- Travelers Casualty and Surety Company of America
- Chubb (Federal Insurance Company)
- AIG

MAJOR CONTRACT COUNTERPARTY:

- TransCanada
- Columbia Gas Transmission, LLC
- Transcontinental Gas Pipe Line Company, LLC
- Sunoco Partners Marketing & Terminals, LP
- Sunoco Pipeline, LP
- Energy Transfer Partners
- NiSource Corporate Services Company
- Consumers Energy Company
- Northcoast Gas Transmission LLC
- The Williams Companies, Inc.

TAXING AUTHORITIES:

- Michigan Department of Treasury
- Ohio Department of Taxation
- Pennsylvania Department of Revenue
- West Virginia State Tax Department
- City of Perrysburg
- Maryland Department of Assessments & Taxation
- Wood County Treasurer
- Alabama Office of State Treasurer
- Alabama Licensing Board for General Contractors
- Arizona Department of Revenue, Unclaimed Property Section
- Arizona Registrar of Contractors
- Arkansas Licensing Board

- Arkansas Secretary of State
- Colorado Secretary of State
- State of Delaware, Division of Corporations
- Florida Department of Business and Professional Regulation
- Florida Department of State, Division of Corporations
- Georgia Secretary of State, Corporations Division
- Illinois Secretary of State
- Maine Department of the Secretary of State
- Comptroller of Maryland
- Michigan Department of Licensing and Regulatory Affairs
- Nevada Secretary of State
- Nevada State Contractors Board
- North Dakota Secretary of State
- Oregon Secretary of State
- South Carolina Department of Labor, Licensing and Regulation
- Texas Comptroller
- Utah Division of Corporations and Commercial Code
- Utah Division of Occupational and Professional Licensing
- Commonwealth of Virginia State Corporation Commission
- State of West Virginia, Division of Labor

TOP 30 UNSECURED CREDITORS:

- Travelers Casualty and Surety Company of America
- Chubb (Federal Insurance Company)
- AIG
- Cleveland Brothers Equipment Company
- Clearwater Construction, Inc.
- Pipeline Machinery
- Ohio CAT
- Southeast Directional Drilling
- Cross Country Pipeline Supply
- United Piping Inc.

- Bedrock Environmental Services
- Outlaw Padding Company
- CRC-Evans Pipeline Intl. Inc.
- Laney Directional Drilling
- Pipeline Supply & Service Holdings
- Bechtel Corporation
- United Rentals North America
- Maxx HDD, LLC
- US Crossings Unlimited, LLC
- Azul Estrella Services of Mississippi
- Sunbelt Equipment Marketing, I
- LGS Restoration, LLC
- Gwinnup's Restoration and Environmental
- Earth Pipeline Services, Inc.
- I.U.O.E. Benefit Fund of Eastern PA & DE
- IUOE & Pipe Line Employers H&W Fund
- Laborers-Employers Benefit Plan Collection Trust
- Schmid Pipeline Construction, Inc.
- Mears Group, Inc.
- Michigan CAT
- Trans Energy Pipeline Services, LLC
- Central Pension Fund

UTILITIES

- AEP Ohio
- Braido RV Park
- CenturyLink
- Connectwise, Inc.
- Country Waste of Pennsylvania, LLC
- DMC Technology
- Glen Dale Municipal Utilities
- Lebanon Farms Disposal (Waste Industries)
- Suddenlink
- Comcast
- West Penn Power
- PPL Electric Utilities
- PenTeleData

- Met-Ed
- UGI Utilities
- Toledo Edison
- City of Perrysburg
- Columbia Gas of Ohio
- Buckeye Telesystem
- Verizon Wireless
- Intermedia.net
- Republic Services
- Waste Management

DELAWARE BANKRUPTCY JUDGES

- Chief Judge Brendan L. Shannon
- Judge Kevin J. Carey
- Judge Kevin Gross
- Judge Christopher S. Sontchi
- Judge Laurie Selber Silverstein
- Judge Mary F. Walrath

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- Jaclyn Weissgerber
- Michael West
- Dion Wynn

Schedule 2

Interested Parties or their Affiliates who or which Blank Rome LLP Represents or May Have Represented in the Past Five (5) Years in Matters Unrelated to the Chapter 11 Cases

<i>Entity Name</i>	<i>Relationship to Debtors</i>	<i>Relationship to Blank Rome</i>
Navigators Insurance Co.	Insurance	Current or Former Client
Zurich Amer. Ins. Co.	Insurance	Current or Former Client
Travelers Casualty and Surety Co. of America	Surety	Current or Former Client
Chubb	Surety	Current or Former Client
AIG	Surety	Current or Former Client
Sunoco Pipeline, LP	Contract Counterparty	Current or Former Client
NiSource Corporate Svcs. Co.	Contract Counterparty	Current or Former Client
The Williams Cos., Inc.	Contract Counterparty	Current or Former Client
Clearwater Construction, Inc.	Top 30 Unsecured Creditors	Current or Former Client
Comcast	Utilities	Current or Former Client
PPL Elec. Utilities	Utilities	Current or Former Client
UGI Utilities	Utilities	Current or Former Client
Verizon Wireless	Utilities	Current or Former Client
Republic Services	Utilities	Current or Former Client

EXHIBIT B

Declaration of Walter Curtis Keal

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
WELDED CONSTRUCTION, L.P., <i>et al.</i> , ¹)	Case No. 18-12378 (KG)
Debtors.)	(Jointly Administered)
)	

**DECLARATION OF WALTER CURTIS KEAL, AS REPRESENTATIVE OF OHIO
MACHINERY CO., CHAIRPERSON OF THE COMMITTEE, IN SUPPORT OF
APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
WELDED CONSTRUCTION, L.P., *ET AL.*, FOR ENTRY OF AN ORDER
AUTHORIZING THE COMMITTEE TO RETAIN AND EMPLOY BLANK ROME LLP
AS ITS COUNSEL PURSUANT TO 11 U.S.C. §§ 328 AND 1103, FED. R. BANKR. P. 2014,
AND LOCAL R. 2014-1 NUNC PRO TUNC TO OCTOBER 30, 2018**

I, Walter Curtis Keal, hereby declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury as follows:

1. I am over the age of 21 and am competent in all respects to make this Declaration. I am the representative of Ohio Machinery Co. (“OMC”) in connection with the above-captioned chapter 11 cases. OMC serves as Chairperson of Official Committee of Unsecured Creditors (the “Committee”) of Welded Construction, L.P. and its affiliated debtor (together, the “Debtors”). This declaration is being submitted in support of the *Application of the Official Committee of Unsecured Creditors of Welded Construction, L.P., et al., for Entry of an Order Authorizing the Committee to Employ Blank Rome LLP as Its Counsel Pursuant to 11 U.S.C. §§ 328 and 1103, Fed. R. Bankr. P. 2014, and Local R. 2014-1 Nunc Pro Tunc to October 30, 2018* (the “Application”).² Except as otherwise noted, all facts in this Declaration are based on my personal

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Welded Construction, L.P. (5008) and Welded Construction Michigan, LLC (9830). The mailing address for each of the Debtors is 26933 Eckel Road, Perrysburg, OH 43551.

² Unless otherwise defined herein, all capitalized terms shall have the meanings ascribed to them in the Application.

knowledge of the matters set forth herein, information gathered from my review of relevant documents and information supplied to me by Blank Rome.

2. This declaration is provided pursuant to ¶ D.2 of the U.S. Trustee Guidelines. I am informed by Blank Rome that the U.S. Trustee Guidelines require that any application for employment of an attorney under 11 U.S.C. §§ 327 or 1103 be accompanied by a verified statement from the client that addresses the following:

- (a) The identity and position of the person making the verification. The person ordinarily should be the general counsel of the debtor or another officer responsible for supervising outside counsel and monitoring and controlling legal costs.
- (b) The steps taken by the client to ensure that the applicant's billing rates and material terms for the engagement are comparable to the applicant's billing rates and terms for other non-bankruptcy engagements and to the billing rates and terms of other comparably skilled professionals.
- (c) The number of firms the client interviewed.
- (d) If the billing rates are not comparable to the applicant's billing rates for other nonbankruptcy engagements and to the billing rates of other comparably skilled professionals, the circumstances warranting the retention of that firm.
- (e) The procedures the client has established to supervise the applicant's fees and expenses and to manage costs. If the procedure for the budgeting, review and approval of fees and expenses differ from those the client regularly employs in nonbankruptcy cases to supervise outside general counsel, explain how and why. In addition, describe any efforts to negotiate rates including rates for routing matters, or in the alternative to delegate such matters to less expensive counsel.

A. Identity of Declarant

3. On October 30, 2018, the Office of United States Trustee for the District of Delaware (the "U.S. Trustee") appointed the Committee pursuant to section 1102(a)(1) of the Bankruptcy Code. The Committee is currently comprised of the following seven (7) members: (i) Ohio Machinery Co.; (ii) Cleveland Brothers Equipment Co., Inc.; (iii) United Piping, Inc.; (iv)

PipeLine Machinery International, LP; (v) Earth Pipeline Services, Inc.; (vi) IUOE and Pipe Line Employers Health & Welfare Fund; and (vii) Schmid Pipeline.

4. As the representative on behalf of OMC, a member and one of the Chairpersons of the Committee, I was directly involved in the Committee's decision to retain Blank Rome as the Committee's lead counsel in these chapter 11 cases, and I actively participated in negotiating the terms of Blank Rome's employment together with the other members of the Committee.

B. Steps Taken to Ensure Comparability of Engagement Terms

5. I have confirmed with Blank Rome that, while its billing rates vary from attorney-to-attorney based on such factors as the attorney's seniority and position with the firm (e.g., partner, associate), years of experience, and the demand for services in the attorney's particular area of expertise, its billing rates do not vary as a function of whether the services performed relate to a bankruptcy engagement or a non-bankruptcy engagement.

6. The Committee has been informed that Blank Rome endeavors to set the hourly rates for its attorneys and paraprofessionals at levels competitive to those charged by firms with which they compete. The Committee confirmed that the material terms for the engagement are comparable to terms of other comparably skilled professionals. It is the Committee's understanding that the hourly billing rates of Blank Rome are appropriate in light of the breadth of its experience and areas of expertise.

C. Number of Firms Interviewed and Selection of Blank Rome as Counsel

7. On the day the Committee was formed, the Committee interviewed four other law firms. During each interview, the Committee sought information with respect to each of the firms' bankruptcy and non-bankruptcy billing practices, hourly rates and experience. Ultimately, the Committee selected Blank Rome to serve as its counsel.

D. Other Circumstances Warranting Retention of Blank Rome

8. The Committee selected Blank Rome as its counsel because of the firm's extensive experience and knowledge in the fields of creditors' rights, business reorganizations, restructurings, and liquidations under chapter 11 of the Bankruptcy Code, particularly in the context of asset sales, reorganizations, and liquidations.

E. Procedures Established to Supervise Fees and Expenses and Manage Costs

9. Throughout these Chapter 11 Cases, the Committee will supervise the fees and expenses incurred by Blank Rome to manage costs. In particular, I or another OMC representative will review Blank Rome's invoices and monthly applications for payment of fees and reimbursement of expenses. The Committee understands that Blank Rome historically increases the hourly billing rates for its professionals and paraprofessionals on a yearly basis. The Committee has consented to such ordinary course rate increases.

10. Blank Rome has provided me with a budget and staffing plan, which have been approved by the Committee. The Committee has been advised that the primary Blank Rome attorneys and paraprofessionals staffed on these cases, subject to modification depending upon further development, are as set forth below:

<u>Timekeeper</u>	<u>Title</u>	<u>Standard Hourly Rate</u>
Michael B. Schaedle	Partner	\$780.00
John E. Lucian	Partner	\$690.00
Josef W. Mintz	Associate	\$535.00
Jose F. Bibiloni	Associate	\$355.00
Christopher A. Lewis	Paralegal	\$330.00

The Committee understands that, from time to time, other Blank Rome attorneys may be involved in these Chapter 11 Cases as needed.

11. Blank Rome has informed me that, if the Committee objects to the fees and expenses requested by Blank Rome in any monthly fee statement, and the objection cannot be resolved informally, Blank Rome will file a Notice of Objection to Fee Statement on the Committee's behalf. I understand that, in doing so, Blank Rome reserves all rights to contest any such objection raised to the allowance or payment of its requested fees and expenses, and the Committee reserves the right to retain conflicts counsel to prosecute any such fee objection if it cannot be resolved informally by the parties.

12. Nothing contained herein is intended to limit Blank Rome's ability to request allowance and payment of fees and expenses pursuant to 11 U.S.C. §§ 330 and 331, nor to restrict Blank Rome's right to defend any objection raised to the allowance or payment of such fees, nor to restrict the Committee's right to retain conflicts counsel to prosecute any such fee objection to the extent it is not resolved informally by the parties or raised by another party in interest, such as the U.S. Trustee.

13. Based on the foregoing, the Committee is of the opinion that it is necessary to employ Blank Rome and that such employment is in the best interest of the Debtors' estates.

[Signature follows]

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

Dated: November 19, 2018

/s/ *Walter Curtis Keal*

Name: Walter Curtis Keal, as representative of
Ohio Machinery Co., solely in its capacity as
Committee Chairperson

EXHIBIT C

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
WELDED CONSTRUCTION, L.P., <i>et al.</i> , ¹)	Case No. 18-12378 (KG)
Debtors.)	(Jointly Administered)
)	Related Docket Nos.: ____

**ORDER AUTHORIZING THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF WELDED CONSTRUCTION, L.P., *ET AL.*, TO RETAIN AND
EMPLOY BLANK ROME LLP AS ITS COUNSEL PURSUANT TO
11 U.S.C. §§ 328 AND 1103, FED. R. BANKR. P. 2014, AND
LOCAL R. 2014-1 NUNC PRO TUNC TO OCTOBER 30, 2018**

UPON CONSIDERATION of the application (the “Application”)² of the Official Committee of Unsecured Creditors (the “Committee”) of Welded Construction, L.P., *et al.* (collectively, the “Debtors”), for an order, pursuant to sections 328(a) and 1103 of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, authorizing the Committee to employ and retain the law firm of Blank Rome LLP (“Blank Rome”) as its counsel *nunc pro tunc* to October 30, 2018; and upon (a) the verified statement of John E. Lucian, a partner of the Blank Rome firm, in support of the Application and (b) the declaration of Walter Curtis Keal, as representative of Ohio Machinery Co., solely in its capacity as a chairperson of the Committee, in support of the Application; and the Court finding that (a) the Court has jurisdiction over the Application pursuant to §§ 157 and 1334 and (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A); and the Court being satisfied that, except as set forth in the Verified Statement, Blank Rome and its professionals: (a) are not creditors, equity security holders or insiders of the Debtors, (b) are not

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Welded Construction, L.P. (5008) and Welded Construction Michigan, LLC (9830). The mailing address for each of the Debtors is 26933 Eckel Road, Perrysburg, OH 43551.

² Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Application.

and were not, within two (2) years before the Petition Date, directors, officers or employees of the Debtors, (c) do not hold or represent any interest materially adverse to the interest of the Debtors' estates and (d) are not related to any judge of this Court, the U.S. Trustee for this District or any employee of the U.S. Trustee in this District; and, accordingly, Blank Rome and its professionals are "disinterested persons" within the meaning of section 101(14), as modified by section 1107(b) of the Bankruptcy Code; and Blank Rome's representation of the Committee being permissible under sections 328(a) and 1103 of the Bankruptcy Code; and it appearing that the relief requested is in the best interests of the Debtors' estates, their creditors, and other parties-in-interest; and it appearing that notice of the Application and opportunity for a hearing thereon was appropriate under the particular circumstances and that no other or further notice need be given; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED AND DECREED THAT:

1. The Application is GRANTED as set forth herein.
2. Pursuant to sections 328 and 1103 of the Bankruptcy Code, the Committee is hereby authorized and empowered to employ the firm of Blank Rome, *nunc pro tunc* to October 30, 2018, as its counsel in the Debtors' chapter 11 cases, and Blank Rome is authorized to perform the services set forth in the Application.
3. Blank Rome shall apply for compensation and reimbursement of expenses in accordance with the procedures set forth in sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and any applicable orders of this Court.
4. This Court shall retain jurisdiction to hear and determine all matters arising from or relating to the implementation of this Order.

5. Notwithstanding any Bankruptcy Rule to the contrary, this Order shall take effect immediately upon its entry.

CERTIFICATE OF SERVICE

I, Jose F. Bibiloni, hereby certify that on November 19, 2018, I served or caused to be served the foregoing *Application of the Official Committee of Unsecured Creditors of Welded Construction, L.P., et al., for Entry of an Order Authorizing the Committee to Retain and Employ Blank Rome LLP as its Counsel Pursuant to 11 U.S.C. §§ 328 and 1103, Fed. R. Bankr. P. 2014, and Local R. 2014-1 Nunc Pro Tunc to October 30, 2018* (the “Application”), together with the *Notice of the Application*, upon the persons listed on the attached service list via U.S. first-class mail, postage fully pre-paid.

/s/ Jose F. Bibiloni

Jose F. Bibiloni (DE No. 6261)

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