

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

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

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**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON JANUARY 15, 2019 AT 2:00 P.M. (ET)**

**ADJOURNED AND RESOLVED MATTERS**

1. Debtors’ First Omnibus Motion for Entry of an Order, Pursuant to Sections 105(a), 365(a), and 554(a) of the Bankruptcy Code, Authorizing the Debtors to Reject Certain Unexpired Leases of Nonresidential Real Property and Executory Contracts *Nunc Pro Tunc* to the Rejection Date [D.I. 262, 11/21/18]

Response/Objection Deadline: December 5, 2018 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Limited Objection and Reservation of Rights of Yak Mat, LLC [D.I. 300, 12/4/18]

Related Documents:

- B. Certification of Counsel [D.I. 321, 12/11/18]
- C. Order, Pursuant to Sections 105(a), 365(a), and 554(a) of the Bankruptcy Code, Authorizing the Debtors to Reject Certain Unexpired Leases of Nonresidential Real Property and Executory Contracts *Nunc Pro Tunc* to the Rejection Date [D.I. 324, 12/11/18]

Status: As it pertains to the objection of Yak Mat, LLC, this matter has been adjourned to the omnibus hearing date scheduled on February 13, 2019 at 10:00 a.m. (ET). An order has been entered with respect to the remaining leases.

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<sup>1</sup> 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. Motion of PACCAR Financial Corp. for an Order Granting Relief from the Automatic Stay [D.I. 270, 11/26/18]

Response/Objection Deadline: December 17, 2018 at 4:00 p.m. (ET); extended for the Debtors, the Committee and the lenders until February 6, 2019 at 4:00 p.m. (ET)

Responses/Objections Received: None to date

Related Documents: None to date

Status: This matter has been adjourned to the omnibus hearing date scheduled on February 13, 2019 at 10:00 a.m. (ET).

3. Motion of PACCAR Financial Corp. for an Order Compelling Assumption or Rejection of Unexpired Leases Pursuant to 11 U.S.C. § 365 [D.I. 272, 11/26/18]

Response/Objection Deadline: December 17, 2018 at 4:00 p.m. (ET); extended for the Debtors, the Committee and the lenders until February 6, 2019 at 4:00 p.m. (ET)

Responses/Objections Received: None to date

Related Documents: None to date

Status: This matter is has been adjourned to the omnibus hearing date scheduled on February 13, 2019 at 10:00 a.m. (ET)

4. Debtors' Motion Pursuant to Sections 501 and 502 of the Bankruptcy Code, Bankruptcy Rules 2002 and 3003(c)(3), and Local Rule 2002-1(e) for Order Establishing Deadlines for Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof [D.I. 342, 12/18/18]

Response/Objection Deadline: January 2, 2019 at 4:00 p.m. (ET); extended for the Committee to January 8, 2019 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Informal Response of the Office of the United States Trustee
- B. Informal Response of the Official Committee of Unsecured Creditors

Related Documents:

C. Certification of Counsel [D.I. 398, 1/8/19]

D. Order [D.I. 403, 1/10/19]

Status: An order has been entered. No hearing is necessary

5. Motion of Ohio Machinery Company Seeking Order (I) Compelling Debtors to Perform Their Obligations Under their Insurance Policies to Obtain Coverage and Turn Over Proceeds; (II) Determining that Certain Insurance Proceeds are Not Property of Debtors' Estates; (III) Granting Relief from or Modifying Automatic Stay as to Insurers; and (IV) Allowing Administrative Claims and Directing Immediate Payment Thereof [D.I. 364, 12/24/18]

Response/Objection Deadline: January 7, 2019 at 4:00 p.m. (ET); extended for the Debtors, the Committee, the DIP Lender and the Chubb Companies until February 6, 2019 at 4:00 p.m. (ET)

Responses/Objections Received: None to date

Related Documents: None to date

Status: This matter is adjourned to the omnibus hearing date scheduled on February 13, 2019 at 10:00 a.m. (ET).

6. Motion of Ohio Machinery Company for Order Directing Examination of Debtors and Production of Documents Pursuant to Fed. R. Bankr. P. 2004 [D.I. 365, 12/24/18]

Response/Objection Deadline: January 7, 2019 at 4:00 p.m. (ET); extended for the Debtors, the Committee, the DIP Lender and the Chubb Companies until February 6, 2019 at 4:00 p.m. (ET)

Responses/Objections Received: None to date

Related Documents: None to date

Status: This matter is adjourned to the omnibus hearing date scheduled on February 13, 2019 at 10:00 a.m. (ET).

**UNCONTESTED MATTER UNDER CERTIFICATION**

7. Motion of the Official Committee of Unsecured Creditors for an Order Regarding Creditor Access to Information and Setting and Fixing Creditor Information Sharing Procedures and Protocols Under 11 U.S.C. §§ 105(a), 107(b), and 1102(b)(3) [D.I. 359, 12/21/18]

Response/Objection Deadline: January 7, 2019 at 4:00 p.m. (ET)

Responses/Objections Received: None

Related Documents:

- A. Certificate of No Objection [D.I. 400, 1/8/19]
- B. Proposed Order

Status: A certificate of no objection has been filed. No hearing is necessary.

**MATTERS GOING FORWARD**

8. Debtors' Second Omnibus Motion for Entry of an Order, Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code, Authorizing the Debtors to Reject Certain Unexpired Leases *Nunc Pro Tunc* to the Lease Rejection Date and Certain Executory Contracts [D.I. 318, 12/7/18]

Response/Objection Deadline: December 21, 2018 at 4:00 p.m. (ET); extended for Ohio Machinery Company to January 3, 2019 at 4:00 p.m. (ET); extended to January 8, 2019 at 4:00 p.m. (ET) for VFS Leasing, PipeLine Machinery, Barco Rent-a-Truck and Committee

Responses/Objections Received:

- A. Limited Objection of Caterpillar Financial Services Corporation [D.I. 346, 12/20/18]
- B. Objection of PACCAR Financial Corp.[D.I. 348, 12/20/18]
- C. Joinder of MacAllister Machinery Co., Inc. d/b/a MacAllister Rentals and Michigan CAT to Limited Objection of Caterpillar Financial Services Corporation [D.I. 355, 12/21/18]

- D. Limited Objection of Enviro Service Rentals, LLC, Cross Country Pipeline Supply Co., Inc., Outlaw Padding Company and T & C Rentals [D.I. 357, 12/21/18]
- E. Limited Objection of Sunbelt Equipment Marketing, Inc. and Sunbelt Tractor & Equipment Company, Inc. [D.I. 358, 12/21/18]
- F. Objection of Ohio Machinery Company [D.I. 367, 12/24/18]
- G. Objection of VFS Leasing Co. [D.I. 397, 1/8/19]

Related Documents: None.

Status: The Debtors are working to resolve the responses received prior to the hearing. In the event that such a response is not resolved prior to the hearing, it will be adjourned to the omnibus hearing date scheduled on February 13, 2019 at 10:00 a.m. (ET). The Debtors will submit a revised form of order for entry at or prior to the hearing for any resolved responses and those contracts and leases for which no response was received.

### **STATUS CONFERENCE**

9. Status Conference at the Request of the Debtors Pursuant to 11 U.S.C. § 105(d)(1)

Status: The Debtors will provide an update to the Court with respect to the status and progress of the chapter 11 cases.

Dated: January 11, 2019  
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Allison S. Mielke

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