

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)
) Chapter 11
)
WELDED CONSTRUCTION, L.P., *et al.*,¹) Case No. 18-12378 (KG)
)
Debtors.) (Jointly Administered)
)
)
) Objection Deadline: March 6, 2019 at 4:00 p.m. (ET)
) Hearing Date: March 13, 2019 at 10:00 a.m. (ET)

**NOTICE OF FIRST INTERIM FEE REQUEST OF THE
DEBTORS' PROFESSIONALS FOR THE PERIOD FROM
OCTOBER 22, 2018 THROUGH AND INCLUDING DECEMBER 31, 2018**

TO: (I) THE DEBTORS; (II) THE U.S. TRUSTEE; (III) COUNSEL FOR THE DIP LENDER; (IV) COUNSEL FOR THE COMMITTEE; AND (V) ALL PARTIES THAT, AS OF THE FILING OF THIS FEE REQUEST, HAVE REQUESTED NOTICE IN THESE CHAPTER 11 CASES PURSUANT TO BANKRUPTCY RULE 2002

PLEASE TAKE NOTICE that, pursuant to that certain *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 230] (the “**Interim Compensation Order**”), the professionals retained by the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) hereby apply for interim quarterly allowance of compensation and reimbursement of expenses (each, a “**Fee Request**,” and collectively, the “**Fee Requests**”) for all interim monthly fee applications covering the period from October 22, 2018, through and including December 31, 2018. Summaries of the fees and expenses subject to the Fee Requests are provided in the attachments hereto and set forth in the monthly fee applications previously filed with the Court. Pursuant to the Interim Compensation Order, the Debtors were previously authorized to pay, on an interim basis, eighty (80%) percent of the amount of compensation requested and one hundred (100%) percent of the reimbursable expenses requested without further order from the Court upon the expiration of a 20-day objection period.

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 OBJECTIONS, IF ANY, TO A FEE REQUEST ARE REQUIRED TO BE FILED AND SERVED ON THE AFFECTED PROFESSIONAL AND THE FOLLOWING PARTIES ON OR BEFORE MARCH 6, 2019 AT 4:00 P.M. (ET): (i) Welded Construction, L.P., 26933 Eckel Road, Perrysburg, OH 43551 (Attn: Frank A. Pometti, Chief Restructuring Officer); (ii) proposed counsel to the Debtors, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801 (Attn: Tara C. Pakrouh, Esq.); (iii) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Federal Building, Room 2207, 844 North King Street, Wilmington, DE 19801, (Attn: Jaclyn Weissgerber, Esq. and Jane M. Leamy, Esq.); (iv) counsel for the DIP Lender, Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, NY 10166 (Attn: Michael A. Rosenthal, Esq. and Matthew K. Kelsey, Esq.); and (v) counsel to any Committee).

PLEASE TAKE FURTHER NOTICE that a hearing to consider approval of the Fee Requests will be held before the Honorable Kevin Gross, United States Bankruptcy Court for the District of Delaware, 824 Market Street, 6th Floor, Courtroom No. 3, Wilmington, Delaware 19801, on **MARCH 13, 2019 AT 10:00 A.M. (ET)**.

Dated: February 14, 2019
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Allison S. Mielke

M. Blake Cleary (No. 3614)
Sean M. Beach (No. 4070)
Robert F. Poppiti, Jr., (No. 5052)
Allison S. Mielke (No. 5934)
Betsy L. Feldman (No. 6410)
Rodney Square
1000 North King Street
Wilmington, DE 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1256

Counsel to the Debtors

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FOR THE DISTRICT OF DELAWARE**

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)	Objection Deadline: March 6, 2019 at 4:00 p.m. (ET)
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**FIRST INTERIM FEE REQUEST OF
YOUNG CONAWAY STARGATT & TAYLOR, LLP**

Name of Applicant:	Young Conaway Stargatt & Taylor, LLP
Authorized to Provide Professional Services to:	Debtors and Debtors-in-Possession
Date of Retention:	October 22, 2018 (Order entered November 15, 2018 [Docket No. 234])
Period for which compensation and reimbursement is sought:	October 22, 2018 through and including December 31, 2018

Monthly Fee Application Filing Date & Docket No.	Period Covered	Total Requested Fees	Total Requested Expenses	CNO Filing Date & Docket No.	Amount of Fees Paid or to be Paid (80%)	Amount of Expenses Paid or to be Paid (100%)	Amount of Holdback Fees Sought (20%)
12/20/18 D.I. 347	10/22/18 – 11/30/18	\$629,570.50	\$5,815.10	1/10/19 D.I. 406	\$503,656.40	\$5,815.10	\$125,914.10
1/15/19 D.I. 420	12/1/18 – 12/31/18	\$443,598.00	\$14,545.93	2/5/19 D.I. 474	\$354,878.40	\$14,545.93	\$88,719.60
Totals		\$1,073,168.50	\$20,361.03		\$858,534.80	\$20,361.03	\$214,633.70

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

In re:

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Debtors.

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) Chapter 11

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) **Objection Deadline: March 6, 2019 at 4:00 p.m. (ET)****Hearing Date: March 13, 2019 at 10:00 a.m. (ET)**

**FIRST INTERIM FEE REQUEST OF
LANDIS RATH & COBB LLP**

Name of Applicant:

Landis Rath & Cobb LLP, Special Counsel

Authorized to Provide Professional
Services to:

Debtors and Debtors-in-Possession

Date of Retention:

October 22, 2018 (Order entered November 15, 2018
[Docket No. 232])Period for which compensation and
reimbursement is sought:October 22, 2018 through and including
December 31, 2018

Monthly Fee Application Filing Date & Docket No.	Period Covered	Total Requested Fees	Total Requested Expenses	CNO Filing Date & Docket No.	Amount of Fees Paid or to be Paid (80%)	Amount of Expenses Paid or to be Paid (100%)	Amount of Holdback Fees Sought (20%)
12/5/18 D.I. 307	10/22/18 – 11/30/18	\$141,548.50	\$5,989.81	12/27/18 D.I. 378	\$113,238.80	\$5,989.81	\$28,309.70
1/22/19 D.I. 430	12/1/18 – 12/31/18	\$87,400.00	\$689.79	2/12/19 D.I. 495	\$69,920.00	\$689.79	\$17,480.00
Totals		\$228,948.50	\$6,679.60		\$183,158.80	\$6,679.60	\$45,789.70