

**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> , ¹)	Case No. 18-12378 (KG))		
Debtors.)	(Jointly Administered))		
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**AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON MARCH 13, 2019 AT 10:00 A.M. (ET)**

**WITH PERMISSION FROM THE COURT THIS HEARING HAS BEEN
CANCELLED AS NO MATTERS ARE GOING FORWARD**

RESOLVED MATTER

1. Debtors’ Motion for an Order, Pursuant to Section 1121(d) of the Bankruptcy Code, Extending the Excusive Periods Within Which the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof [D.I. 503, 2/15/19]

Response/Objection Deadline: March 1, 2019 at 4:00 p.m. (ET)

Responses/Objections Received: None

Related Documents:

A. Certificate of No Objection [D.I. 536, 3/4/19]

B. Order [D.I. 538, 3/5/19]

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

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 **Amended items appear in bold.**



ADJOURNED MATTERS

2. 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:

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

Related Documents:

- D. Certification of Counsel [D.I. 321, 12/11/18]
- E. 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 April 17, 2019 at 10:00 a.m. (ET). An order has been entered with respect to the remaining leases.

3. 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:

- H. Order [D.I. 421, 1/15/19]
- I. Order [D.I. 442, 1/28/19]
- J. Order [D.I. 446, 1/30/19]

Status: Orders have been entered resolving items A, B and G. This matter is adjourned to the omnibus hearing date scheduled on April 17, 2019 at 10:00 a.m. (ET) only as it pertains to the unresolved objections in items C, D, E, and F.

- 4. 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

Responses/Objections Received: None to date

Related Documents:

- A. Notice of Hearing [D.I. 366, 12/24/18]

Status: This matter is adjourned to the omnibus hearing date scheduled on April 17, 2019 at 10:00 a.m. (ET).

5. 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

Responses/Objections Received: None to date

Related Documents

- A. Notice of Hearing [D.I. 366, 12/24/19]

Status: This matter is adjourned to the omnibus hearing date scheduled on April 17, 2019 at 10:00 a.m. (ET).

6. Motion of Yak Mat, LLC for Allowance and Immediate Payment of Administrative Expense Claim Pursuant to 11 U.S.C. § 503(b)(1) [D.I. 391, 1/3/19]

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

Responses/Objections Received: None to date

Related Documents: None to date

Status: This matter is adjourned to the omnibus hearing date scheduled on April 17, 2019 at 10:00 a.m. (ET).

7. Motion of Cleveland Brothers Equipment Co., Inc. for an Order (I) Compelling Debtors to Perform their Obligation 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 the Automatic Stay as to Insurers; and (IV) Allowing Administrative Claims and Directing Immediate Payment Thereof [D.I. 437, 1/23/19]

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

Responses/Objections Received: None to date

Related Documents: None to date

Status: This matter is adjourned to the omnibus hearing date scheduled on April 17, 2019 at 10:00 a.m. (ET).

8. Debtors' Fifth 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 and Executory Contracts [D.I. 455, 2/19/19]

Response/Objection Deadline: February 15, 2019 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Objection of Gopher Mats, LLC d/b/a Viking Mat Co. [D.I. 504, 2/15/19]

Related Documents: None to date

Status: This matter is adjourned to the omnibus hearing date scheduled on April 17, 2019 at 10:00 a.m. (ET).

9. Motion of Gopher Mats, LLC for Allowance and Immediate Payment of Administrative Expense Claims Pursuant to 11 U.S.C. Sections 503(b)(1) and 507(a)(2) [D.I. 512, 2/20/19]

Response/Objection Deadline: March 13, 2019 at 4:00 p.m. (ET); extended for the Debtors, TransCanada and the DIP Lenders to March 20, 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 April 17, 2019 at 10:00 a.m. (ET).

MATTERS UNDER CERTIFICATION

10. Motion of Willy's for Order Approving Stipulation with Debtors to Allow Recovery from Available Insurance Coverage, and Relief from the Automatic Stay to the Extent Applicable [D.I. 506, 2/19/19]

Response/Objection Deadline: March 6, 2019 at 4:00 p.m. (ET)

Responses/Objections Received: None

Related Documents:

A. Certificate of No Objection [D.I. 540, 3/7/19]

B. **Order [D.I. 552, 3/11/19]**

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

11. Debtors' Motion for an Order (I) Establishing a Bar Date for Filing Administrative Expense Claims, Other than 503(b)(9) Claims, and (II) Approving the Form and Manner of Notice Thereof [D.I. 516, 2/21/19]

Response/Objection Deadline: March 6, 2019 at 4:00 p.m. (ET)

Responses/Objections Received:

A. Informal Response from the Office of the United States Trustee

Related Documents:

B. Certification of Counsel [D.I. 547, 3/11/19]

C. **Order [D.I. 554, 3/11/19]**

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

FEE APPLICATIONS

12. First Interim Fee Applications [See Exhibit A attached hereto]

Responses/Objections Received: See Exhibit A hereto

Related Documents: See Exhibit A hereto

- A. Certification of Counsel Regarding Proposed Order Approving First Interim Fee Requests of the Debtors' Professionals for the Period from October 22, 2018 Through and Including December 31, 2018 [D.I. 544, 3/8/19]
- B. **Order [D.I. 551, 3/11/19]**
- C. Certification of Counsel Regarding Proposed Order Approving First Interim Fee Applications of the Committee Professionals for the Period from October 30, 2018 Through December 31, 2018 [D.I. 546, 3/11/19]
- D. **Order [D.I. 553, 3/11/19]**

Status: Orders have been entered. No hearing is required.

Dated: March 11, 2019
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Allison S. Mielke

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Counsel to the Debtors

EXHIBIT A

WELDED CONSTRUCTION, L.P., et al.
CASE NO. 18-12378 (KG)

INDEX OF FIRST INTERIM FEE APPLICATIONS

A. Young Conaway Stargatt & Taylor, LLP [D.I. 496, 2/14/19]

1. First Monthly Application of Young Conaway Stargatt & Taylor, LLP for Allowance of Compensation and Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for Services Rendered for the Period from October 22, 2018 through November 30, 2018 [D.I. 347, 12/20/18]
2. Certificate of No Objection [D.I. 406, 1/10/19]
3. Second Monthly Application of Young Conaway Stargatt & Taylor, LLP for Allowance of Compensation and Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for Services Rendered for the Period from December 1, 2018 through December 31, 2018 [D.I. 420, 1/15/19]
4. Certificate of No Objection [D.I. 474, 2/5/19]

B. Landis Rath & Cobb LLP [D.I. 498, 2/14/19]

1. First Consolidated Monthly Application of Landis Rath & Cobb LLP, Special Counsel to the Debtors and Debtors-in-Possession, for Compensation and Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 for the Period from the Petition Date through and Including November 30, 2018 [D.I. 307, 8/7/18]
2. Certificate of No Objection [D.I. 378, 12/27/18]
3. Second Consolidated Monthly Application of Landis Rath & Cobb LLP, Special Counsel to the Debtors and Debtors-in-Possession, for Compensation and Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 for the Period from December 1, 2018 through and Including December 31, 2018 [D.I. 430, 1/22/19]
4. Certificate of No Objection [D.I. 495, 2/12/19]

C. Blank Rome LLP [D.I. 501, 2/14/19]

1. First Monthly Application of Blank Rome LLP, counsel to the Official Committee of Unsecured Creditors, for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from October 30, 2018 through November 30, 2018 [D.I. 313, 12/6/18]
2. Certificate of No Objection [D.I. 376, 12/27/18]

3. Second First Monthly Application of Blank Rome LLP, counsel to the Official Committee of Unsecured Creditors, for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from December 1, 2018 through December 31, 2018 [D.I. 429, 1/18/19]
4. Certificate of No Objection [D.I. 488, 2/8/19]

D. Teneo Capital LLC [D.I. 500, 2/14/19]

1. First Monthly Application of Teneo Capital LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Investment Banker and Financial Advisor to the Official Committee of Unsecured Creditors for the Period from October 30, 2018 through November 30, 2018 [D.I. 317, 12/7/18]
2. Certificate of No Objection [D.I. 380, 12/28/18]
3. Second Monthly Application of Teneo Capital LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Investment Banker and Financial Advisor to the Official Committee of Unsecured Creditors for the Period from December 1, 2018 through December 31, 2018 [D.I. 405, 1/10/19]
4. Certificate of No Objection [D.I. 452, 1/31/19]