

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

In re:

WELDED CONSTRUCTION, L.P., *et al.*,<sup>1</sup>

Debtors.

)  
) Chapter 11  
)  
) Case No. 18-12378 (KG)  
)  
) (Jointly Administered)  
)  
) Ref. Docket Nos. 726, 729, & 730

**CERTIFICATION OF COUNSEL REGARDING *PROPOSED ORDER*  
APPROVING SECOND INTERIM FEE REQUESTS OF THE DEBTORS'  
PROFESSIONALS FOR THE PERIOD FROM JANUARY 1, 2019  
THROUGH AND INCLUDING MARCH 31, 2019**

The undersigned hereby certifies as follows:

1. On May 15, 2019, the professionals retained in these chapter 11 cases by the above captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Fifth Monthly and Second Interim 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 January 1, 2019 Through and Including March 31, 2019* [Docket No. 726]; the *Second Interim Fee Request of the Debtors’ Professionals for the Period from January 1, 2019 Through and Including March 31, 2019* [Docket No. 729]; and the *Supplement to Second Interim Fee Request of Young Conaway Stargatt & Taylor, LLP* [Docket No. 730] (collectively, the “Debtors’ Fee Requests”). The Debtors’ Fee Requests include interim fee requests for the following professionals retained by the Debtors:

<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.



- Young Conaway Stargatt & Taylor, LLP (“YCST”), counsel to the Debtors
- Landis Rath & Cobb LLP (“LRC”), special counsel to the Debtors

2. Objections, if any, to the Debtors’ Fee Requests were required to be filed and served on or before June 4, 2019 at 4:00 p.m. (ET) (the “Objection Deadline”). Prior to the Objection Deadline, counsel for the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) provided the Debtors with certain informal comments and questions regarding the Debtors’ Fee Requests. The U.S. Trustee requested a reduction of YCST’s fees in the amount of \$5,187.00. YCST has agreed to such reduction, as reflected in the proposed order approving the Debtors’ Fee Requests, attached hereto as **Exhibit 1** (the “Proposed Order”). The undersigned hereby certifies, as of the date hereof, that no other answer, objection, or other responsive pleading to the Debtors’ Fee Requests has been received, and that she has reviewed the docket in these chapter 11 cases and no answer, objection, or other responsive pleading to the Debtors’ Fee Requests appears thereon.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order without further notice or hearing at the Court’s earliest convenience.

Dated: June 6, 2019  
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Allison S. Mielke

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Sean M. Beach (No. 4070)  
Robert F. Poppiti, Jr. (No. 5052)  
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*Counsel to the Debtors*

**EXHIBIT 1**

**Proposed Order**



ORDERED, that the Fee Requests are APPROVED, on an interim basis, in the amounts set forth on Exhibit A attached hereto; and it is further

ORDERED, that the Professionals are granted interim allowance of compensation in the amounts set forth on Exhibit A attached hereto; and it is further

ORDERED, that the Professionals are granted, on an interim basis, reimbursement of expenses in the amounts set forth on Exhibit A attached hereto; and it is further

ORDERED, that the Debtors are authorized and directed, as provided herein, to remit, or caused to be remitted, payment in the amounts set forth on Exhibit A attached hereto, less any and all amounts previously paid on account of such fees and expenses; and it is further

ORDERED, that this Order shall be deemed a separate order for each of the Professionals, and the appeal of any order with respect to any of the Professionals shall have no effect on the authorized fees and expenses of any of the other Professionals; and it is further

ORDERED, that this Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

**EXHIBIT A**

<b>PROFESSIONAL</b>	<b>FEES</b>	<b>EXPENSES</b>
Young Conaway Stargatt & Taylor, LLP Counsel to the Debtors 1/1/19–3/31/19	\$1,496,180.50 <sup>1</sup>	\$21,625.55
Landis Rath & Cobb, LLP Special Counsel to the Debtors 1/1/19–3/31/19	\$33,928.50	\$444.47

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<sup>1</sup> This amount reflects an agreed to reduction between Young Conaway Stargatt & Taylor, LLP and the Office of the United States Trustee in the amount of \$5,187.00 for fees for the second interim period.