

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

In re:

WELDED CONSTRUCTION, L.P., *et al.*,¹

Debtors.

WELDED CONSTRUCTION, L.P. AND
WELDED CONSTRUCTION MICHIGAN,
LLC,

Plaintiffs,

VS.

PRIME NDT SERVICES, INC.,

Defendant.

WELDED CONSTRUCTION, L.P.,

Plaintiff,

VS.

THE WILLIAMS COMPANIES, INC.,
WILLIAMS PARTNERS OPERATING LLC,
and TRANSCONTINENTAL GAS PIPE LINE
COMPANY, LLC,

Defendants.

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.



**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED
FOR HEARING ON JUNE 12, 2019 AT 10:00 A.M. (ET)**

**AT THE DIRECTION OF THE COURT THIS HEARING IS CANCELLED
AS NO MATTERS ARE GOING FORWARD**

RESOLVED/ADJOURNED 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 July 10, 2019 at 10:00 a.m. (ET). An order has been entered with respect to the remaining leases.

2. 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]

² Amended items appear in bold.

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 the 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 July 10, 2019 at 10:00 a.m. (ET) only as it pertains to the unresolved objections in items C, D, E, and F.

3. 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 July 10, 2019 at 10:00 a.m. (ET).

4. 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 July 10, 2019 at 10:00 a.m. (ET).

5. 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 July 10, 2019 at 10:00 a.m. (ET).

6. 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 July 10, 2019 at 10:00 a.m. (ET).

7. 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 Company [D.I. 504, 2/15/19]

Related Documents:

- B. Notice of Hearing on and Supplement to 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. 578, 3/20/19]
- C. Notice of Telephonic Status Conference [D.I. 594, 3/28/19]
- D. Scheduling Order [D.I. 636, 4/15/19]

- E. Notice of 30(b)(6) Deposition Directed to Gopher Mats, LLC d/b/a Viking Mat Company [D.I. 673, 4/26/19]
- F. Notice of Deposition of Aaron Westbrook [D.I. 677, 4/29/19]
- G. Notice of Deposition of Victor Vazquez [D.I. 678, 4/29/19]
- H. Notice of Deposition of Welded Construction, L.P. Pursuant to Federal Rule 30(b)(6) [D.I. 679, 4/29/19]
- I. Notice of Deposition of Columbia Gas Transmission, LLC Pursuant to Federal Rule 30(b)(6) [D.I. 680, 4/29/19]
- J. Notice of Deposition of Tyler Whitney [D.I. 684, 4/30/19]
- K. Notice of Withdrawal of Docket Nos. 673 & 684 [D.I. 702, 5/3/19]

Status: The parties have reached an agreement in principle, subject to documentation, resolving this matter. The parties anticipate filing a motion to approve such agreement.

- 8. Motion of Gopher Mats, LLC for Allowance and Immediate Payment of Administrative Expense Claim 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:

- A. Debtors' Preliminary Objection [D.I. 576, 3/20/19]
- B. Joinder of the Official Committee of Unsecured Creditors to Debtors' Preliminary Objection [D.I. 577, 3/20/19]
- C. Columbia Gas's Preliminary Objection [D.I. 579, 3/21/19]

Related Documents:

- D. Notice of Telephonic Status Conference [D.I. 594, 3/28/19]
- E. Scheduling Order [D.I. 636, 4/15/19]

- F. Notice of 30(b)(6) Deposition Directed to Gopher Mats, LLC d/b/a Viking Mat Company [D.I. 673, 4/26/19]
- G. Notice of Deposition of Aaron Westbrook [D.I. 677, 4/29/19]
- H. Notice of Deposition of Victor Vazquez [D.I. 678, 4/29/19]
- I. Notice of Deposition of Welded Construction, L.P. Pursuant to Federal Rule 30(b)(6) [D.I. 679, 4/29/19]
- J. Notice of Deposition of Columbia Gas Transmission, LLC Pursuant to Federal Rule 30(b)(6) [D.I. 680, 4/29/19]
- K. Notice of Deposition of Tyler Whitney [D.I. 684, 4/30/19]
- L. Notice of Withdrawal of Docket Nos. 673 & 684 [D.I. 702, 5/3/19]

Status: The parties have reached an agreement in principle, subject to documentation, resolving this matter. The parties anticipate filing a motion to approve such agreement.

- 9. Motion of Union Leasing, Inc. d/b/a Express 4x4 Trunk Rental for Allowance and Payment of Administrative Expense Claim Pursuant to 11. U.S.C. § 503(b)(1)(a) [D.I. 526, 2/28/19]

Response/Objection Deadline: March 21, 2019 at 4:00 p.m. (ET); extended for the Debtors, DIP Lender, and the Committee to June 24, 2019 at 4:00 p.m. (ET)

Responses/Objections Received: None to date

Related Documents:

- A. Re-Notice of Motion [D.I. 601, 4/1/19]

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

- 10. Amended Motion of Jeremy Keith for Relief from the Automatic Stay Pursuant to 11 U.S.C. Section 362(d) [D.I. 628, 4/10/19]

Response/Objection Deadline: May 1, 2019 at 4:00 p.m. (ET); extended for the Debtors and the Committee to July 3, 2019 at 4:00 p.m. (ET)

Responses/Objections Received: None to date

Related Documents:

- A. Motion of Jeremy Keith for Relief from the Automatic Stay Pursuant to 11 U.S.C. Section 362(d) [D.I. 626, 4/9/19]

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

- 11. Debtors' Motion for Entry of an Order Approving the Litigation Funding and Cooperation Agreement [D.I. 704, 5/3/19]

Response/Objection Deadline: May 17, 2019 at 4:00 p.m. (ET)

Responses/Objections Received: None

Related Documents:

- A. Certificate of No Objection [D.I. 743, 5/21/19]
- B. Order [D.I. 745, 5/22/19]

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

- 12. Debtors' First (1st) Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1 [D.I. 721, 5/13/19]

Response/Objection Deadline: May 28, 2019 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Informal Response of certain claimants
- B. Informal Response from Hoffman Ford Sales Inc.
- C. Response from Highway Equipment Company [D.I. 755, 5/28/19]
- D. Response of Graybar Electric Co., Inc. [D.I. 757, 5/29/19]

Related Documents:

- E. Order [D.I. 758, 5/29/19]
- F. Certification of Counsel [D.I. 769, 6/4/19]

G. Order [D.I. 773, 6/4/19]

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

13. Debtors' Motion for an Order, Pursuant to Section 1121(d) of the Bankruptcy Code, Further Extending the Exclusive Periods Within Which the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof [D.I. 738, 5/17/19]

Response/Objection Deadline: May 31, 2019 at 4:00 p.m. (ET)

Responses/Objections Received: None

Related Documents:

A. Certificate of No Objection [D.I. 767, 6/3/19]

B. Order [D.I. 771, 6/4/19]

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

14. Debtors' Second Motion for an Order, Pursuant to Bankruptcy Rules 9006 and 9027, Extending the Period Within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 [D.I. 739, 5/17/19]

Response/Objection Deadline: May 31, 2019 at 4:00 p.m. (ET)

Responses/Objections Received: None

Related Documents:

A. Certificate of No Objection [D.I. 768, 6/3/19]

B. Order [D.I. 772, 6/4/19]

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

FEE APPLICATIONS

15. Second Interim Fee Applications [See Exhibit A attached hereto]

Responses/Objections Received: See Exhibit A attached hereto

Related Documents: See Exhibit A attached hereto

- A. 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 [D.I. 778, 6/6/19]
- B. Certification of Counsel Regarding Proposed Order Approving Second Interim Fee Applications of the Committee Professionals for the Period from January 1, 2019 Through March 31, 2019 [D.I. 781, 6/6/19]
- C. **Order Approving Second Interim Fee Requests of the Debtors' Professionals for the Period from January 1, 2019 Through and Including March 31, 2019 [D.I. 785, 6/10/19]**
- D. **Order Approving Second Interim Fee Requests of the Committee Professionals for the Period from January 1, 2019 Through and Including March 31, 2019 [D.I. 786, 6/11/19]**

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

ADVERSARY MATTER PRETRIAL CONFERENCE – WELDED CONSTRUCTION, L.P. v. PRIME NDT SERVICES, INC. (19-50180)

16. Complaint [Adv. D.I. 1, 3/27/19]

Responses/Objection Deadline: April 29, 2019

Responses/Objections Received:

- A. Prime NDT Services, Inc.'s Motion to Withdraw the Reference of the Adversary Proceeding [Adv. D.I. 5, 4/26/19]
- B. Prime NDT Services, Inc.'s Partial Motion to Dismiss Plaintiffs' Complaint [Adv. D.I. 7, 4/26/19]
- C. Plaintiffs' Opposition to Prime NDT Services, Inc.'s Partial Motion to Dismiss Plaintiffs' Complaint [D.I. 12, 5/31/19]
- D. Prime NDT Services, Inc.'s Reply in Support of its Partial Motion to Dismiss Plaintiffs' Complaint [D.I. 14, 6/7/19]

Related Documents:

- E. Summons and Notice of Pretrial Conference [D.I. 3, 3/27/19]
- F. Amended Summons and Notice of Pretrial Conference [D.I. 4, 3/28/19]

G. Certification of Counsel Regarding Proposed Agreed Scheduling Order [D.I. 13, 6/7/19]

H. **Agreed Scheduling Order [D.I. 16, 6/10/19]**

Status: A scheduling order has been entered. No hearing is required.

ADVERSARY MATTER PRETRIAL CONFERENCE – WELDED CONSTRUCTION, L.P., v. THE WILLIAMS COMPANIES, INC., ET AL. (19-50194)

17. Debtors' Motion for Entry of an Order Authorizing the Debtors to File Portions of Certain Exhibits Under Seal [Adv. D.I. 3, 5/6/19]

Responses/Objection Deadline: May 20, 2019 at 4:00 p.m. (ET)

Responses/Objections Received: None

Related Documents:

A. Certificate of No Objection [Adv. D.I. 15, 6/3/19]

B. Order [Adv. D.I. 16, 6/4/19]

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

Dated: June 11, 2019
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Allison S. Mielke

Sean M. Beach (No. 4070)

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Counsel to the Debtors

Exhibit A

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

INDEX OF SECOND INTERIM FEE APPLICATIONS

A. Young Conaway Stargatt & Taylor, LLP [D.I. 729, 5/15/19]

1. Third 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 January 1, 2019 through January 31, 2019 [D.I. 513, 2/21/19]
2. Certificate of No Objection [D.I. 562, 3/15/19]
3. Fourth 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 February 1, 2019 through February 28, 2019 [D.I. 566, 3/18/19]
4. Certificate of No Objection [D.I. 625, 4/9/19]
5. Fifth 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 March 1, 2019 through March 31, 2019 [D.I. 656, 4/18/19]
6. Certificate of No Objection [D.I. 716, 5/9/19]
7. Supplement to Second Interim Fee Request of Young Conaway Stargatt & Taylor, LLP [D.I. 730, 5/15/19]

B. Landis Rath & Cobb LLP [D.I. 729, 5/15/19]

1. Third 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 January 1, 2019 through and Including January 31, 2019 [D.I. 522, 2/26/19]
2. Certificate of No Objection [D.I. 575, 3/20/19]
3. Fourth 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 February 1, 2019 through and Including February 28, 2019 [D.I. 563, 3/15/19]
4. Certificate of No Objection [D.I. 617, 4/5/19]

5. 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 [D.I. 726, 5/15/19]
6. Certificate of No Objection [D.I. 776, 6/5/19]

C. Blank Rome LLP [D.I. 732, 5/15/19]

1. Third 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 January 1, 2019 through January 31, 2019 [D.I. 518, 2/26/19]
2. Certificate of No Objection [D.I. 572, 3/19/19]
3. Fourth 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 February 1, 2019 through February 28, 2019 [D.I. 586, 3/27/19]
4. Certificate of No Objection [D.I. 652, 4/17/19]
5. Fifth 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 March 1, 2019 through March 31, 2019 [D.I. 659, 4/22/19]
6. Certificate of No Objection [D.I. 724, 5/14/19]
7. Second Interim 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 January 1, 2019 through March 31, 2019 [D.I. 732, 5/15/19]

D. Teneo Capital LLC [D.I. 731, 5/15/19]

1. Third 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 January 1, 2019 through January 31, 2019 [D.I. 499, 2/14/19]
2. Certificate of No Objection [D.I. 541, 3/7/19]
3. Fourth 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 February 1, 2019 through February 28, 2019 [D.I. 580, 3/22/19]

4. Certificate of No Objection [D.I. 633, 4/12/19]
5. Fifth Monthly Application of Teneo Capital LLC for Compensation for Services Entered and Reimbursement of Expenses Incurred as Investment Banker and Financial Advisor to the Official Committee of Unsecured Creditors for the Period from March 1, 2019 through March 31, 2019 [D.I. 654, 4/17/19]
6. Certificate of No Objection [D.I. 712, 5/8/19]
7. Second Interim Application of Teneo Capital LLC for Compensation for Services Rendered and Reimbursement of Expenses as Investment Banker and Financial Advisor to the Official Committee of Unsecured Creditors for the Period January 1, 2019 through March 31, 2019 [D.I. 731, 5/15/19]