

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
WELDED CONSTRUCTION, L.P., <i>et al.</i> , <sup>1</sup>	)	Case No. 18-12378 (KG)
Debtors.	)	(Jointly Administered)
	)	Objection Deadline: July 23, 2019 at 4:00 p.m. (ET)

NOTICE OF SEVENTH 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 MAY 1, 2019 THROUGH MAY 31, 2019

TO: The “Notice Parties” designated in the Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 15, 2018 [Docket No. 230] (the “**Administrative Order**”):

**PLEASE TAKE NOTICE** that on July 3, 2019, the *Seventh Monthly Application of Blank Rome LLP, Counsel to the Official Committee of Unsecured Creditors* (the “**Committee**”) for *Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from May 1, 2019 through May 31, 2019* (“**Fee Application**”) was filed with the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”), 824 N. Market Street, Wilmington, Delaware 19801. By the Fee Application, Blank Rome LLP (“**Blank Rome**”) seeks the allowance and payment of (i) interim compensation in the amount of \$59,358.40 (80% of \$74,198.00) for professional services rendered and (ii) reimbursement of expenses incurred in the amount of \$283.00 as counsel to the Committee during the period from May 1, 2019 through and including May 31, 2019.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Administrative Order, any objections or responses to the Fee Application must be (i) filed with the Bankruptcy Court in accordance with the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware on or before **July 23, 2019 at 4:00 p.m. (prevailing Eastern Time)** (the “**Objection Deadline**”) and (ii) served upon, so as to be received by, (a) the undersigned counsel to the Committee and (b) the Notice Parties prior the Objection Deadline. Copies of the Fee Application are available upon written request to the undersigned. A hearing on the Fee Application shall be held only in the event timely objections are filed.

<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.



**PLEASE TAKE FURTHER NOTICE** that pursuant to the Administrative Order, in the absence of any objection or responsive papers to the Fee Application, Blank Rome is authorized to file a certificate of no objection with the Bankruptcy Court, after which Blank Rome is authorized to be paid compensation in the amount of \$59,358.40 (80% of \$74,198.00) for services rendered to the Committee and reimbursement of \$283.00 for expenses incurred on behalf of the Committee, as requested in the Fee Application. If no objection to the Fee Application is timely filed and served, Blank Rome is authorized to be paid 80% of the fees and 100% of the expenses not subject to such objection.

Dated: July 3, 2019  
Wilmington, Delaware

**BLANK ROME LLP**

/s/ Jose F. Bibiloni

Josef W. Mintz (DE No. 5644)  
Jose F. Bibiloni (DE No. 6261)  
1201 Market Street, Suite 800  
Wilmington, Delaware 19801  
Telephone: (302) 425-6400  
Facsimile: (302) 425-6464  
Email: Mintz@BlankRome.com  
JBibiloni@BlankRome.com

Michael B. Schaedle (admitted *pro hac vice*)  
John E. Lucian (admitted *pro hac vice*)  
One Logan Square  
130 North 18th Street  
Philadelphia, Pennsylvania 19103  
Telephone: (215) 569-5500  
Facsimile: (215) 569-5555  
Email: Schaedle@BlankRome.com  
Lucian@BlankRome.com

*Counsel to the Official Committee of Unsecured  
Creditors of Welded Construction, L.P., et al.*

**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)

**Objection Deadline: July 23, 2019 at 4:00 p.m. (ET)**

**SUMMARY COVER SHEET TO THE SEVENTH 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 MAY 1, 2019 THROUGH MAY 31, 2019**

*Name of Applicant:*

Blank Rome LLP

*Authorized to provide professional services to:*

Official Committee of Unsecured Creditors

*Monthly period for which compensation and reimbursement is sought:*

May 1, 2019 through May 31, 2019

*Monthly amount of compensation sought  
as actual, reasonable, and necessary:*

\$59,358.40 (80% of \$74,198.00)

*Monthly amount of expense reimbursement sought as actual, reasonable, and necessary:*

\$283.00

*Petition date:*

October 22, 2018

*Date of retention:*

October 30, 2018

*Date of order approving employment:*

December 6, 2018

*Total compensation approved by interim order to date:*

\$1,005,304.50

*Total expenses approved by interim order to date:*

\$7,684.06

*Total compensation and expenses paid to date:*

\$1,145,631.58

<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.

*Blended rate in this application for all attorneys:* \$658.92

*Blended rate in this application for all timekeepers:* \$624.56

*Compensation sought in this application already paid pursuant to a monthly compensation order but not yet allowed:* Not applicable.

*Expenses sought in this application already paid pursuant to a monthly compensation order but not yet allowed:* Not applicable.

*Number of professionals included in this application:* 7

*Number of professionals in this application not included in staffing plan:* 2

*Difference between fees budgeted and compensation sought for this period:* Not applicable.

*Number of professionals billing fewer than 15 hours to the case during this period:* 3

*Are any rates higher than those approved or disclosed at retention?* Yes.

This is a(n):   x   monthly    interim    final application

Time expended on preparation and filing this fee application will be included in a subsequent Blank Rome monthly fee application. This application includes time expended in connection with Blank Rome's previous interim and monthly fee applications totaling approximately 7.30 hours and the corresponding compensation requested hereby is approximately \$2,729.00. By this fee application, Blank Rome requests interim allowance and payment of such fees.

**Summary of Monthly Fee Applications Previously Filed by Blank Rome LLP:**

<b>Monthly Fee Application</b>		<b>Amounts Requested</b>		<b>Amounts Approved to Date</b>	
<b>Date Filed</b>	<b>Period Covered</b>	<b>Fees</b>	<b>Expenses</b>	<b>Fees</b>	<b>Expenses</b>
12/6/2018 D.I. 313	10/30/2018 – 11/30/2018 (First Monthly)	\$375,119.00	\$1,895.34	\$375,119.00 (100%) D.I. 553	\$1,895.34 (100%) D.I. 553
1/18/2019 D.I. 429	12/1/2018 – 12/31/2018 (Second Monthly)	\$137,058.50	\$13,483.28	\$137,058.50 (100%) D.I. 553	\$1,413.28 (100%) D.I. 553
2/26/2019 D.I. 518	1/1/2019 – 1/31/2019 (Third Monthly)	\$176,342.50	\$2,802.42	\$176,342.50 (100%) D.I. 786	\$2,802.42 (100%) D.I. 786
3/27/2019 D.I. 586	2/1/2019 – 2/28/2019 (Fourth Monthly)	\$158,653.50	\$1,155.64	\$158,653.50 (100%) D.I. 786	\$1,155.64 (100%) D.I. 786
4/22/2019 D.I. 659	3/1/2019 – 3/31/2019 (Fifth Monthly)	\$158,131.00	\$417.38	\$158,131.00 (100%) D.I. 786	\$417.38 (100%) D.I. 786
6/5/2019 D.I. 777	4/1/2019 – 4/30/2019 (Sixth Monthly)	\$165,094.00	\$568.00	\$132,075.20 (80%) D.I. 807	\$568.00 (100%) D.I. 807

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

In re:	)	
	)	Chapter 11
WELDED CONSTRUCTION, L.P., <i>et al.</i> , <sup>1</sup>	)	Case No. 18-12378 (KG)
Debtors.	)	(Jointly Administered)
	)	Objection Deadline: July 23, 2019 at 4:00 p.m. (ET)
	)	

**SEVENTH 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 MAY 1, 2019 THROUGH MAY 31, 2019**

This seventh monthly fee application for compensation for services rendered and reimbursement of expenses incurred (the “*Fee Application*”) is filed by Blank Rome LLP (“*Blank Rome*”) requesting payment for services rendered and reimbursement of expenses incurred as counsel to the Official Committee of Unsecured Creditors (the “*Committee*”) of the above-captioned debtors and debtors in possession (the “*Debtors*”) for the period from May 1, 2019 through and including May 31, 2019 (the “*Application Period*”). In support of this Fee Application, Blank Rome respectfully states as follows:

**Jurisdiction**

1. Pursuant to 28 U.S.C. §§ 157 and 1334, this Court has jurisdiction to consider and grant the relief requested herein. A proceeding to consider and grant such relief is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

---

<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. The statutory predicates for the relief sought herein are sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (collectively, the “**Bankruptcy Rules**”), DEL. BANKR. L.R. 2016-2, and the Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, which was entered on November 15, 2018 [Docket No. 230] (the “**Administrative Order**”).

3. Pursuant to DEL. BANKR. L.R. 9013-1(f), Blank Rome consents to the entry of a final judgment or order with respect to the Fee Application if it is determined that the United States Bankruptcy Court for the District of Delaware (the “**Court**”), absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

### **Background**

4. On October 22, 2018 (the “**Petition Date**”), the Debtors each filed a voluntary petition under chapter 11 the Bankruptcy Code. Pursuant to sections 1107 and 1108 of the Bankruptcy Code, the Debtors continue to manage and operate their businesses and property as debtors in possession. No trustee or examiner has been appointed in these cases.

5. On October 30, 2018, the Office of United States Trustee for the District of Delaware (the “**U.S. Trustee**”) appointed the Committee pursuant to section 1102(a)(1) of the Bankruptcy Code.

6. Subsequent to its formation, on October 30, 2018, the Committee selected Blank Rome as its counsel in these chapter 11 cases. The Committee also selected Teneo Capital LLC (“**Teneo**”) as its investment banker and financial advisor.

7. On December 6, 2018, upon prior application of the Committee [Docket No. 253] (the “**Blank Rome Employment Application**”), the Court entered the *Order Authorizing*

*the Official Committee of Unsecured Creditors of Welded Construction, L.P., et al. to Retain and Employ Blank Rome LLP as its Counsel Pursuant to 11 U.S.C. §§ 328 and 1103, Fed. R. Bankr. P. 2014, and Local R. 2014-1 Nunc Pro Tunc to October 30, 2018* [Docket No. 311].

8. On February 14, 2019, Blank Rome filed the *First 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 October 30, 2018 Through December 31, 2018* [Docket No. 501] (the “**First Interim Fee Application**”). On March 31, 2019, the Court entered an order [Docket No. 553] approving the First Interim Fee Application.

9. On May 15, 2019, Blank Rome filed the *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* [Docket No. 732] (the “**Second Interim Fee Application**”). On June 11, 2019, the Court entered an order [Docket No. 786] approving the Second Interim Fee Application.

10. Blank Rome did not receive, and is not holding, a retainer in connection with these chapter 11 cases. To date, Blank Rome has been paid \$1,145,631.58 by the Debtors in connection with Blank Rome’s previous monthly and interim fee applications.

11. With offices in New York, Pennsylvania, Delaware and other locations, Blank Rome is a nationally recognized law firm with extensive experience and expertise in bankruptcy and reorganization proceedings. The Committee has employed Blank Rome to represent it as counsel and perform services for the Committee in connection with carrying out its fiduciary duties and responsibilities under the Bankruptcy Code consistent with section 1103(c) and other provisions of the Bankruptcy Code.



12. Presently, the professionals at Blank Rome having the primary day-to-day responsibility for this matter are Michael B. Schaedle, John E. Lucian, Josef W. Mintz, Jose F. Bibiloni, and paralegal Christopher A. Lewis. The Committee is aware that Blank Rome has drawn upon and will draw upon the knowledge and skills of other firm attorneys and paraprofessionals to provide services as the need arises.

**Customary Disclosures, Budget and Staffing Plan**

13. This Fee Application is supported by the following exhibits, which are attached hereto and patterned on *Appendix B – Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, Effective November 1, 2013* (the “*U.S. Trustee Guidelines*”):<sup>2</sup>

- (a) **Exhibit A** attached hereto contains a disclosure of “customary and comparable compensation” charged by Blank Rome’s professionals and paraprofessionals. As requested by Section C.3 of the U.S. Trustee Guidelines, Exhibit A provides a summary of the blended hourly rates during the Application Period of the timekeepers (segregated by position) included in this Fee Application compared to the average hourly rates for timekeepers in Blank Rome’s domestic United States offices in connection with non-bankruptcy engagements.
- (b) **Exhibit B** attached hereto contains a summary of timekeepers for Blank Rome for these chapter 11 cases during the Application Period.
- (c) **Exhibit C** attached hereto contains the staffing plan for Blank Rome for these chapter 11 cases during the Application Period.

**Statement Pursuant to U.S. Trustee Guidelines**

14. The following is provided in response to the questions set forth in Section C.5 of the U.S. Trustee Guidelines:

---

<sup>2</sup> As set forth in the Blank Rome Employment Application, Blank Rome intends to make a reasonable effort to comply with the U.S. Trustee’s requests for information and additional disclosures as set forth in the U.S. Trustee Guidelines in connection with the Fee Application and any interim and final fee applications to be filed by Blank Rome in these chapter 11 cases. The foregoing was based exclusively on the facts and circumstances of the Debtors’ chapter 11 cases and Blank Rome fully reserves the right to object to such requirements, or any other requirements contained in the U.S. Trustee Guidelines in future cases should it determine that it is appropriate to do so.

**Question:** Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

**Response:** No.

**Question:** If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?

**Response:** Not applicable.

**Question:** Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

**Response:** No.

**Question:** Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.

**Response:** No.

**Question:** Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

**Response:** No.

**Question:** If the fee application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

**Response:** This Fee Application includes rate increases effective as of January 1, 2019. See **Exhibit B** hereto. As disclosed in the Blank Rome Employment Application, the Committee understands that Blank Rome's billing rates are subject to periodic, typically yearly, adjustments to reflect economic and other conditions. The Committee has consented to such ordinary course rate increases. Blank Rome will disclose any future rate increases.

**Relief Requested**

15. Blank Rome submits this Fee Application pursuant to sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, DEL. BANKR. L.R. 2016-2, and the Administrative Order. By this Fee Application, Blank Rome seeks (a) interim allowance of compensation for actual and necessary professional services rendered to the Committee during the Application Period in the amount of \$74,198.00 and payment by the Debtors of 80% of this amount (\$59,358.40), and (b) the allowance and payment of 100% of its actual and necessary expenses incurred during the Application Period in the amount of \$283.00, all in accordance with the terms of the Administrative Order.

**Summary of Fees**

16. The total number of hours expended by Blank Rome professionals and paraprofessionals in performing professional services for the Committee during the Application Period was **118.80** hours at a blended billing rate of **\$624.56** per hour. The value of these services has been computed at the rates Blank Rome customarily charges for similar services provided to other clients.

17. A summary and a detailed chronological itemization of the services rendered by each attorney and paraprofessional during the Application Period, calculated by tenths of an hour and categorized in accordance with the appropriate task codes, is attached hereto as **Exhibit D**. Every effort has been made by Blank Rome to categorize daily time entries in accordance with the correct task code. However, in some instances, services overlap between task codes. Thus, some services may appear under more than one task code, although in no instance is a specific time entry recorded more than once.

18. Specifically, the services rendered by Blank Rome during the Application Period included the following, without limitation:

**(Task Code 001) Asset Sales / Disposition**

**Total Hours: 3.00 Total Fees: \$2,392.00**

This category includes Blank Rome's review and analysis of the Debtors' equipment sale process and discussions with the Debtors, Alix Partners, and Teneo regarding same. This category also includes time analyzing issues related to asset impairment notices delivered to the Debtors by Gordon Brothers/Ritchie Brothers and the Debtors' responses thereto.

**(Task Code 006) Case Administration (General)**

**Total Hours: 11.20 Total Fees: \$6,108.00**

This category includes Blank Rome's work in connection with a variety of case procedural matters, hearing calendaring, review of various pending motions, and other general matters pertaining to the chapter 11 cases, as well as attendance and participation in weekly case process calls with the Debtors' advisors.

**(Task Code 007) Claims Administration and Objections**

**Total Hours: 2.80 Total Fees: \$2,228.00**

This category includes Blank Rome's work in reviewing and analyzing the general claims pool in the cases as well as work in connection with Gopher Mats' motion for the immediate payment of administrative expense claim.

**(Task Code 008) Creditors Committee  
(Internal / Communications with Creditors)**

**Total Hours: 23.70 Total Fees: \$14,073.00**

This category includes Blank Rome's work advising the Committee on all matters, including weekly Committee meetings and other frequent communications, drafting certain

internal Committee documents, preparing presentations on case issues, and other Committee business.

**(Task Code 009) Employee Benefits and Pension**

**Total Hours: 11.40 Total Fees: \$8,770.00**

This category includes Blank Rome's work analyzing certain pension fund claims filed in the cases and the preparation and negotiation of a tolling agreement and other documents in connection with same.

**(Task Code 013) Fee Applications – Internal**

**Total Hours: 7.30 Total Fees: \$2,729.00**

This category includes Blank Rome's work preparing and filing its second interim fee application and initial work in connection with its sixth monthly fee application (April 2019) in these cases.

**(Task Code 014) Fee Applications – Others**

**Total Hours: 4.00 Total Fees: \$1,523.00**

This category includes Blank Rome's work preparing and filing Teneo's second interim fee application and sixth monthly fee application (April 2019) in these cases.

**(Task Code 016) Insurance Issues**

**Total Hours: 7.50 Total Fees: \$5,951.50**

This category includes Blank Rome's work in connection with the review, analysis, and negotiation of various issues pertaining to Chubb/Federal Insurance Company in the cases.

**(Task Code 017) Investigation of Company**

**Total Hours: 9.90**

**Total Fees: \$6,889.50**

This category includes Blank Rome's work investigating the prepetition conduct of the Debtors and their affiliates and insiders, preparation of related discovery, the review and analysis of documents produced by the Debtors and DIP lender in connection with the investigation, as well as research conducted in relation to same.

**(Task Code 019) Litigation**

**Total Hours: 28.20**

**Total Fees: \$17,993.50**

This category includes Blank Rome's work reviewing and analyzing certain litigation issues related to Williams and Prime NDT as well as the proposed Gopher Mats settlement agreement.

**(Task Code 021) Omnibus Court Hearing – Preparation / Attendance**

**Total Hours: 0.70**

**Total Fees: \$383.00**

This category includes Blank Rome's work in connection with scheduled May 30 hearing, as well as communications with the Debtors regarding hearing dates and related matters.

**(Task Code 022) Plan and Disclosure Statement**

**Total Hours: 0.70**

**Total Fees: \$383.00**

This category includes Blank Rome's work in connection Debtors' motions to extend plan exclusivity and motion to extend the deadline to remove civil actions and communications in connection with same.

**(Task Code 024) Relief from Stay and Adequate Protection**

**Total Hours: 7.90**

**Total Fees: \$4,449.50**

This category includes Blank Rome's work in connection with the review and analysis of various motions for relief from the automatic stay filed in the cases.

The foregoing summary descriptions of services rendered are not intended to be exhaustive descriptions of the scope of Blank Rome's services rendered to the Committee during the Application Period. The time records attached hereto as **Exhibit D** set forth the specific work performed by Blank Rome in each billing category during the Application Period.

**Actual and Necessary Costs and Expenses Incurred**

19. Reimbursement of expenses in the amount of \$283.00 is sought herein. A categorized summary of the actual and necessary costs and expenses incurred by Blank Rome on behalf of the Committee during the Application Period, and an itemization of each expense within each category, is attached as **Exhibit E**. Pursuant to DEL. BANKR. L.R. 2016-2(e)(iii), Blank Rome charges no more than (i) \$0.10 per page for standard photocopies and (ii) actual cost for computer-assisted legal research. Blank Rome does not charge for outgoing or incoming facsimile transmissions. Blank Rome reserves the right to request, in subsequent fee applications, reimbursement of any additional expenses incurred during the Application Period, as such expenses may not have been captured to date in Blank Rome's billing system.

**Blank Rome's Requested  
Compensation and Reimbursement Should Be Allowed**

20. Section 331 of the Bankruptcy Code provides for compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code to govern the Court's award of such compensation. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 1103 of the Bankruptcy Code "reasonable

compensation for actual necessary services rendered . . . and reimbursement for actual, necessary expenses.” 11 U.S.C. § 330(a)(1). Section 330 of the Bankruptcy Code also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded to an examiner, trustee under chapter 11, or professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including —

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

21. Blank Rome respectfully submits that the services for which it seeks compensation in this Fee Application were, at the time rendered, necessary for and beneficial to the Committee and were rendered to protect and preserve the Committee’s rights. Blank Rome further believes that it performed the services for the Committee economically, effectively and efficiently, and the results obtained benefitted the Committee. Blank Rome further submits that the compensation requested herein is reasonable in light of the nature, extent and value of such services to the Committee.



**Compliance with the Bankruptcy Code, the Bankruptcy Rules and Local Rules**

22. In accordance with DEL. BANKR. L.R. 2016-2, a summary schedule of hours and fees for each attorney and paraprofessional, as well as a summary of the hours and fees categorized by project code, is attached hereto at **Exhibit B** and **Exhibit D**, respectively. The undersigned submits that this Fee Application complies with DEL. BANKR. L.R. 2016-2.

23. Blank Rome submits that the services rendered and expenses incurred were actual and necessary and that the compensation sought is reasonable and in accordance with the standards of section 330 of the Bankruptcy Code.

24. No agreement or understanding exists between Blank Rome and any other entity (other than members or employees of Blank Rome) for the sharing of compensation received or to be received for services rendered in or in connection with these cases.

**Notice**

As required by the Administrative Order, a copy of this Fee Application has been served upon: (i) the Debtors; (ii) counsel to the Debtors; (iii) the Office of the United States Trustee for the District of Delaware; and (iv) counsel to North American Pipeline Equipment Company, LLC.

WHEREFORE, Blank Rome respectfully requests an award and payment of compensation for professional services rendered as counsel to the Committee during the Application Period in the sum of \$59,358.40 (80% of \$74,198.00), together with the reimbursement of expenses incurred in the amount of \$283.00, and such other and further relief that the Court deems just, proper and necessary.

Dated: July 3, 2019  
Wilmington, Delaware

**BLANK ROME LLP**

/s/ Jose F. Bibiloni

Josef W. Mintz (DE No. 5644)  
Jose F. Bibiloni (DE No. 6261)  
1201 Market Street, Suite 800  
Wilmington, Delaware 19801  
Telephone: (302) 425-6400  
Facsimile: (302) 425-6464  
Email: Mintz@BlankRome.com  
JBibiloni@BlankRome.com

Michael B. Schaedle (admitted *pro hac vice*)  
John E. Lucian (admitted *pro hac vice*)  
One Logan Square  
130 North 18th Street  
Philadelphia, Pennsylvania 19103  
Telephone: (215) 569-5500  
Facsimile: (215) 569-5555  
Email: Schaedle@BlankRome.com  
Lucian@BlankRome.com

*Counsel to the Official Committee of Unsecured  
Creditors of Welded Construction, L.P., et al.*

**EXHIBIT A****CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES  
(MAY 1, 2019 THROUGH MAY 31, 2019)**

Blank Rome's hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by comparably skilled bankruptcy attorneys. In addition, Blank Rome's hourly rates for bankruptcy services are comparable to the rates charged by the firm for non-bankruptcy engagements staffed by professionals and paraprofessionals in Blank Rome's domestic United States offices, whether in court or otherwise, regardless of whether a fee application is required.

<b>CATEGORY OF TIMEKEEPER</b>	<b>BLENDED HOURLY RATES</b>	
	<b>NON-BANKRUPTCY ENGAGEMENTS ALL DOMESTIC OFFICES AS OF JANUARY 1, 2019<sup>1</sup></b>	<b>CURRENT APPLICATION PERIOD</b>
Partner	\$790.00	\$773.49
Counsel	\$651.00	\$570.00
Associate	\$463.00	\$410.00
Paralegal	\$294.00	\$335.00
<b>Aggregated:</b>	<b>\$637.00 (average)</b>	<b>\$624.56 (blended)</b>

---

<sup>1</sup> This column reflects the average billing rates, rounded to the nearest dollar, as of January 1, 2019, for current active timekeepers in connection with non-bankruptcy engagements.

**EXHIBIT B****SUMMARY OF TIMEKEEPERS INCLUDED IN THIS FEE APPLICATION  
(MAY 1, 2019 THROUGH MAY 31, 2019)**

NAME	POSITION	DEPARTMENT	DATE OF ADMISSION(S)	HOURS BILLED	FEES BILLED	HOURLY RATE		NUMBER OF RATE INCREASES SINCE RETENTION	FEES BILLED USING RATES DISCLOSED AT RETENTION
						In This Fee Application	During First Monthly Fee Application Period		
Andrew Rudolph	Partner	Tax, Benefits and Private Client	Member of PA Bar since 1982	1.10	\$1,017.50	\$925.00	N/A	N/A	\$1,017.50
Michael B. Schaedle	Partner	Finance, Restructuring and Bankruptcy	Member of NY, PA, and NJ Bars since 1992	35.50	\$28,755.00	\$810.00	\$780.00	1	\$27,690.00
John E. Lucian	Partner	Finance, Restructuring and Bankruptcy	Member of MD Bar since 1998; Member of VA, DC and FL Bars since 1999; Member of PA Bar since 2004	19.70	\$14,085.50	\$715.00	\$690.00	1	\$13,593.00
Frederick G. Sandstrom	Partner	Labor & Employment	Member of IL Bar since 2002; Member of DC Bar since 2005; Member of PA Bar since 2012	1.90	\$1,159.00	\$610.00	N/A	N/A	\$1,159.00
Josef W. Mintz	Of Counsel	Finance, Restructuring and Bankruptcy	Member of PA and NJ Bars since 2008; Member of DE Bar since 2011	33.00	\$18,810.00	\$570.00	\$535.00	1	\$17,655.00
Jose F. Bibiloni	Associate	Finance, Restructuring and Bankruptcy	Member of DE Bar since 2016; Member of PA Bar since 2017	15.00	\$6,150.00	\$410.00	\$355.00	1	\$5,325.00

NAME	POSITION	DEPARTMENT	DATE OF	HOURS	FEES	HOURLY RATE		NUMBER OF RATE	FEES BILLED USING RATES
Christopher A. Lewis	Paralegal	Finance, Restructuring and Bankruptcy	N/A	12.60	\$4,221.00	\$335.00	\$330.00	1	\$4,158.00
<b>TOTALS:</b>				<b>118.80</b>	<b>\$74,198.00</b>				<b>\$70,597.50</b>

**EXHIBIT C****STAFFING PLAN FOR BLANK ROME LLP  
FOR THE PERIOD MAY 1, 2019 THROUGH MAY 31, 2019****STAFFING PLAN:**

<b>CATEGORY OF TIMEKEEPER</b>	<b>NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER DURING THE APPLICABLE PERIOD<sup>1</sup></b>	<b>AVERAGE HOURLY RATE</b>
Partners	2	\$762.50
Counsel	1	\$570.00
Associates	1	\$410.00
Paralegals	1	\$335.00

---

<sup>1</sup> This column reflects the professionals and paraprofessionals at Blank Rome having the primary day-to-day responsibility for this matter, as set forth in the Blank Rome Employment Application. Indeed, the timekeepers referenced in this staffing plan billed approximately 97% of the total compensation requested in this Fee Application. As further set forth in the Blank Rome Employment Application and this Fee Application, Blank Rome has drawn upon and will draw upon the knowledge and skills of other firm attorneys and paraprofessionals to provide services as the need arises.

**EXHIBIT D**

**SUMMARY AND DETAILS OF FEES REQUESTED IN  
THIS FEE APPLICATION, CATEGORIZED BY TASK CODE  
(MAY 1, 2019 THROUGH MAY 31, 2019)**

<b>TASK CODE</b>	<b>TASK DESCRIPTION</b>	<b>NUMBER OF HOURS</b>	<b>AMOUNT OF FEES</b>
<b>001</b>	Asset Sales / Disposition	3.00	\$2,392.00
<b>006</b>	Case Administration (General)	11.20	\$6,108.00
<b>007</b>	Claims Administration and Objections	2.80	\$2,228.00
<b>008</b>	Creditors Committee	23.70	\$14,073.00
<b>009</b>	Employee Benefits and Pension	11.40	\$8,770.00
<b>013</b>	Fee Applications - Internal	7.30	\$2,729.00
<b>014</b>	Fee Applications – Others	4.00	\$1,523.00
<b>016</b>	Insurance Issues	7.50	\$5,951.50
<b>017</b>	Investigation of Company	9.90	\$6,889.50
<b>019</b>	Litigation	28.20	\$17,993.50
<b>021</b>	Omnibus Court Hearing	0.70	\$383.00
<b>022</b>	Plan and Disclosure Statement	1.20	\$708.00
<b>024</b>	Relief from Stay and Adequate Protection	7.90	\$4,449.50
<b>TOTALS:</b>		<b>118.80</b>	<b>\$74,198.00</b>

## BLANKROME

ONE LOGAN SQUARE  
 PHILADELPHIA, PA 19103-6998  
 (215)569-5500 FAX: (215) 569-5555  
 FEDERAL TAX I.D. NO. 23-1311874

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
 COMMITTEE  
 ATTN: CURT KEAL, CO-CHAIR  
 3993 E. ROYALTON ROAD  
 OHIO MACHINERY COMPANY  
 BROADVIEW HEIGHTS, OH 44147

INVOICE DATE: JULY 03, 2019  
 MATTER NO. 154278-01600 04015  
 INVOICE NO. 1826888

**REGARDING: WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS COMMITTEE  
 BANKRUPTCY MATTER - WELDED CONSTRUCTION, L.P.**

---

**FOR LEGAL SERVICES RENDERED THROUGH MAY 31, 2019**

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
<b>TASK: 001 ASSET SALES/DISPOSITION</b>					
05/03/19	ATTENTION TO GB/RB ASSET IMPAIRMENT NOTICE; EMAILS RE: SAME	LUCIAN, JOHN	001	0.30	214.50
05/06/19	REVIEW NOTICE OF ASSET IMPAIRMENT FROM GBRB AND RELATED EMAIL	SCHAEDLE, MICHAEL	001	0.40	324.00
05/07/19	DISCUSS SALE MONITORING ISSUES WITH C. BOGUSLASKI AND J. LUCIAN	SCHAEDLE, MICHAEL	001	0.30	243.00
05/12/19	NOTE FROM C. BOGUSLASKI ON SALE PROCESS ISSUES	SCHAEDLE, MICHAEL	001	0.20	162.00
05/21/19	NOTES TO AND FROM C. BOGUSLASKI ON SALE PROCESS STATUS	SCHAEDLE, MICHAEL	001	0.30	243.00
05/23/19	REVIEW MAY IMPAIRMENT NOTICE FROM GBRB	SCHAEDLE, MICHAEL	001	0.20	162.00
05/24/19	REVIEW OBJECTION TO ASSET IMPAIRMENT NOTICE	SCHAEDLE, MICHAEL	001	0.30	243.00
05/28/19	UPDATE FROM DEBTOR RE: EQUIPMENT SALES	LUCIAN, JOHN	001	0.10	71.50
05/30/19	REVIEW NOTES TO AND FROM C. BOGUSLASKI AND F. POMETTI REGARDING SALE PROCESS; NOTE TO AND FROM M. LUNN REGARDING SAME (.1)	SCHAEDLE, MICHAEL	001	0.40	324.00
05/31/19	DISCUSS SALE PROCESS WITH J. LUCIAN	SCHAEDLE, MICHAEL	001	0.20	162.00



WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE  
FILE NUMBER: 154278-01600

PAGE NUMBER: 2  
INVOICE NO. 1826888  
JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/31/19	DISCUSS SALE PROCESS AND REPORTING WITH M. LUNN	SCHAEDLE, MICHAEL	001	0.30	243.00
	<b>001 ASSET SALES/DISPOSITION</b>			<b>3.00</b>	<b>2,392.00</b>
<b>TASK: 006 CASE ADMINISTRATION (GENERAL)</b>					
05/01/19	ADDITIONAL REVIEW OF PRIME NDT PAPERS	SCHAEDLE, MICHAEL	006	0.50	405.00
05/03/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.50	167.50
05/03/19	NOTES TO AND FROM J. MINTZ AND J. LUCIAN REGARDING COOPERATION AGREEMENT	SCHAEDLE, MICHAEL	006	0.20	162.00
05/06/19	REVIEW OF THE WELDED DOCKET TO ASCERTAIN UPCOMING OBJECTION DEADLINES IN CONNECTION WITH VARIOUS MOTIONS.	BIBILONI, JOSE	006	0.40	164.00
05/07/19	PREPARE FOR AND PARTICIPATE IN WEEKLY CALL WITH DEBTORS RE: PENDING MATTERS	LUCIAN, JOHN	006	0.70	500.50
05/07/19	REVIEW AGENDA FOR CASE PROFESSIONAL CALL	SCHAEDLE, MICHAEL	006	0.20	162.00
05/07/19	PARTICIPATE IN CASE PROFESSIONAL CALL	SCHAEDLE, MICHAEL	006	0.50	405.00
05/08/19	REVIEW DOCKET AND PREPARE CERTIFICATE OF NO OBJECTION REGARDING TENEO'S FIFTH MONTHLY (MARCH 2019) FEE APPLICATION (.3); PREPARE AND E-FILE SAME (.2)	LEWIS, CHRISTOPHER	006	0.50	167.50
05/08/19	ATTENTION TO EMAILS RE: DEBTOR BANK ACCOUNTS AND OUST RESPONSE	LUCIAN, JOHN	006	0.20	143.00
05/09/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.80	268.00
05/13/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.40	134.00
05/15/19	REVIEW DOCKET AND UPDATE 2002 SERVICE LIST	LEWIS, CHRISTOPHER	006	0.50	167.50
05/15/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.60	201.00
05/16/19	DISCUSS VARIOUS PENDING MOTIONS IN WELDED WITH J. MINTZ AND OBJECTION DEADLINES RELATED TO SAME.	BIBILONI, JOSE	006	0.10	41.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE  
FILE NUMBER: 154278-01600

PAGE NUMBER: 3  
INVOICE NO. 1826888  
JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/16/19	REVIEW CERTAIN CASE DEADLINES	SCHAEDLE, MICHAEL	006	0.50	405.00
05/17/19	REVIEW CASE CALENDAR REGARDING UPCOMING DEADLINE (.2); EMAILS WITH M. SCHAEDELE REGARDING SAME (.2)	MINTZ, JOSEF	006	0.40	228.00
05/20/19	NOTE TO C. BOGUSLASKI ON CASE STATUS	SCHAEDLE, MICHAEL	006	0.20	162.00
05/20/19	DISCUSS CASE STATUS WITH J. LUCIAN	SCHAEDLE, MICHAEL	006	0.20	162.00
05/21/19	PREPARE FOR AND PARTICIPATE IN DEBTOR CALL RE: PENDING MATTERS	LUCIAN, JOHN	006	0.50	357.50
05/21/19	DISCUSS ACTION PLAN FOR CERTAIN AVOIDANCE ACTIONS WITH J. LUCIAN	SCHAEDLE, MICHAEL	006	0.40	324.00
05/21/19	PARTICIPATE IN CASE PROFESSIONAL CALL; REVIEW RELATED AGENDA (.1)	SCHAEDLE, MICHAEL	006	0.60	486.00
05/22/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.90	301.50
05/28/19	REVIEW J. MINTZ REPORT ON CASE PROFESSIONALS CALL	SCHAEDLE, MICHAEL	006	0.20	162.00
05/29/19	REVIEW WELDED DOCKET IN CONNECTING WITH ASSESSING UPCOMING OBJECTION DEADLINES AND DISCUSS SAME WITH J. MINTZ.	BIBILONI, JOSE	006	0.40	164.00
05/29/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.80	268.00
	<b>006 CASE ADMINISTRATION (GENERAL)</b>			<b>11.20</b>	<b>6,108.00</b>
<b>TASK: 007 CLAIMS ADMINISTRATION AND OBJECTIONS</b>					
05/01/19	STRATEGIZE WITH J. MINTZ AND J. LUCIAN REGARDING GOPHER MATS SETTLEMENT AND REVIEW RELATED REPORT	SCHAEDLE, MICHAEL	007	1.10	891.00
05/02/19	NOTES TO AND FROM J. MINTZ REGARDING GOPHER MATS SETTLEMENT	SCHAEDLE, MICHAEL	007	0.20	162.00
05/09/19	ATTENTION TO NOTE FROM J. LUCIAN RE STATUS OF CLAIMS RELATED TO WILLIAMS PROJECT.	BIBILONI, JOSE	007	0.10	41.00
05/21/19	REVIEW GOPHER SETTLEMENT PAPERS	SCHAEDLE, MICHAEL	007	0.50	405.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE  
FILE NUMBER: 154278-01600

PAGE NUMBER: 4  
INVOICE NO. 1826888  
JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/21/19	REVIEW STATUS OF CLAIMS RECONCILIATION	SCHAEDLE, MICHAEL	007	0.50	405.00
05/23/19	REVIEW CLAIMS RECONCILIATION RELATED COMMUNICATION AND MATTER	SCHAEDLE, MICHAEL	007	0.40	324.00
	<b>007 CLAIMS ADMINISTRATION AND OBJECTIONS</b>			<b>2.80</b>	<b>2,228.00</b>
<b>TASK: 008 CREDITORS COMMITTEE (INTERNAL/COMMUNICATION W/CREDITC</b>					
05/01/19	PREPARE AGENDA FOR MAY 2 COMMITTEE CALL (.4); COMMUNICATIONS WITH BLANK ROME TEAM RE SAME (.2).	BIBILONI, JOSE	008	0.60	246.00
05/01/19	ATTENTION TO PENDING MATTERS AND PREPARE COMMITTEE UPDATE	LUCIAN, JOHN	008	0.50	357.50
05/01/19	REVIEW AGENDA FOR COMMITTEE CALL	SCHAEDLE, MICHAEL	008	0.20	162.00
05/02/19	EMAILS WITH J. MINTZ RE PREPARATION OF INTERNAL COMMITTEE DOCUMENTS.	BIBILONI, JOSE	008	0.20	82.00
05/02/19	PREPARE FOR AND LEAD WEEKLY COMMITTEE MEETING	LUCIAN, JOHN	008	0.80	572.00
05/02/19	PREPARE FOR (.3) AND PARTICIPATE IN COMMITTEE TELECONFERENCE (.7);	MINTZ, JOSEF	008	1.00	570.00
05/02/19	PARTICIPATE IN COMMITTEE CALL	SCHAEDLE, MICHAEL	008	0.50	405.00
05/03/19	FINALIZE CHUBB CONFIDENTIALITY AGREEMENT; EMAILS RE: SAME	LUCIAN, JOHN	008	0.40	286.00
05/06/19	DRAFT AND SEND NOTE TO J. LUCIAN RE UPCOMING COMMITTEE MEETING AND CERTAIN INTERNAL COMMITTEE DOCUMENTS.	BIBILONI, JOSE	008	0.10	41.00
05/06/19	ATTENTION TO COMMITTEE MEMBER REIMBURSEMENT ISSUES.	BIBILONI, JOSE	008	0.10	41.00
05/06/19	DRAFT INTERNAL COMMITTEE DOCUMENTS AND DISCUSS SAME WITH J. LUCIAN AND J. MINTZ.	BIBILONI, JOSE	008	0.80	328.00
05/06/19	REVIEW AND COMMENT ON MEETING MINUTES FROM MAY 2 MEETING	MINTZ, JOSEF	008	0.30	171.00
05/07/19	DISCUSS INTERNAL COMMITTEE DOCUMENTS WITH J. LUCIAN.	BIBILONI, JOSE	008	0.10	41.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 5

INVOICE NO. 1826888

JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/07/19	DISCUSS INTERNAL COMMITTEE MATTERS WITH J. MINTZ (.2); EMAILS WITH J. MINTZ RE SAME (.1).	BIBILONI, JOSE	008	0.30	123.00
05/07/19	REVIEW AND REVISE COMMITTEE RESOLUTIONS; GUIDANCE TO MINTZ RE: BYLAW REVISIONS FOR CHUBB	LUCIAN, JOHN	008	0.50	357.50
05/07/19	EMAILS WITH J. BIBILONI REGARDING COMMITTEE BYLAWS (.2); REVIEW BYLAWS (.3)	MINTZ, JOSEF	008	0.50	285.00
05/08/19	COORDINATE MAY 9 COMMITTEE CALL.	BIBILONI, JOSE	008	0.20	82.00
05/08/19	REVIEW AND REVISE CERTAIN INTERNAL COMMITTEE DOCUMENTS.	BIBILONI, JOSE	008	0.20	82.00
05/08/19	PREPARE AGENDA FOR MAY 9 COMMITTEE CALL AND CONFER WITH J. LUCIAN RE SAME (.7); CIRCULATE SAME TO THE COMMITTEE MEMBERS (.1).	BIBILONI, JOSE	008	0.80	328.00
05/08/19	DRAFT/REVISE DOCUMENTS FOR CHUBB RESOLUTION AND COMMITTEE INVOLVEMENT AND COMMITTEE NDA (1.0); EMAILS RE: SAME (.4)	LUCIAN, JOHN	008	1.40	1,001.00
05/08/19	REVIEW COMMITTEE BYLAWS (.4); REVIEW CONFIDENTIALITY AGREEMENTS (.3); PREPARE FORM OF RESOLUTION TO ALLOW FEDERAL INSURANCE TO ATTEND CERTAIN COMMITTEE MEETINGS (.5); PREPARE FORM OF ADDENDUM TO CONFIDENTIALITY AGREEMENT (.7); DISCUSSIONS WITH J. LUCIAN REGARDING SAME (.2); REVISE RESOLUTION (.2)	MINTZ, JOSEF	008	2.30	1,311.00
05/09/19	FINALIZE CERTAIN INTERNAL COMMITTEE DOCUMENTS IN CONNECTION WITH MAY 9 COMMITTEE MEETING AND CIRCULATE SAME TO THE COMMITTEE.	BIBILONI, JOSE	008	0.30	123.00
05/09/19	PREPARE FOR AND PARTICIPATE IN WEEKLY COMMITTEE CALL.	BIBILONI, JOSE	008	0.60	246.00
05/09/19	PREPARE FOR AND LEAD WEEKLY COMMITTEE TELEPHONIC MEETING	LUCIAN, JOHN	008	0.80	572.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 6

INVOICE NO. 1826888

JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/09/19	PREPARE FOR (.3) AND ATTENDING COMMITTEE CALL (.3)	MINTZ, JOSEF	008	0.60	342.00
05/09/19	NOTES TO AND FROM J. LUCIAN ON COMMITTEE MEETING AGENDA	SCHAEDLE, MICHAEL	008	0.20	162.00
05/09/19	DISCUSS CB AND CHUBB WITH K. GWYNNE	SCHAEDLE, MICHAEL	008	0.20	162.00
05/09/19	CONSIDER CHUBB EX OFFICIO COMMITTEE MEMBERSHIP MATTERS	SCHAEDLE, MICHAEL	008	0.80	648.00
05/14/19	ATTENTION TO COMMITTEE MATTERS	LUCIAN, JOHN	008	0.30	214.50
05/14/19	DISCUSS CB AND CHUBB WITH J. LUCIAN	SCHAEDLE, MICHAEL	008	0.30	243.00
05/15/19	CALL TO CREDITOR RE INQUIRY RECEIVED CONCERNING WELDED.	BIBILONI, JOSE	008	0.10	41.00
05/15/19	CONFER WITH J. LUCIAN AND J. MINTZ RE WEEKLY COMMITTEE MEETING (.1); PREPARE REPORT TO THE COMMITTEE RE CADD LIFT STAY MOTION AND NOTE CANCELLING CALL (.4); DISCUSS SAME WITH J. MINTZ (.1); CIRCULATE REPORT ON CADD MOTION TO THE COMMITTEE (.1).	BIBILONI, JOSE	008	0.70	287.00
05/15/19	EMAILS RE: COMMITTEE MATTERS	LUCIAN, JOHN	008	0.30	214.50
05/15/19	NOTE TO BR WORKING GROUP ON COMMITTEE MEETING	SCHAEDLE, MICHAEL	008	0.20	162.00
05/21/19	CALL WITH CREDITOR RE ISSUES RELATED TO PAYMENT OF THE CREDITOR'S CLAIMS AND OTHER WELDED MATTERS.	BIBILONI, JOSE	008	0.50	205.00
05/22/19	COORDINATE MAY 23 COMMITTEE CALL AND PREPARE AGENDA FOR CALL (.6); CONFER WITH J. LUCIAN RE SAME (.1); CIRCULATE AGENDA TO THE COMMITTEE (.1).	BIBILONI, JOSE	008	0.80	328.00
05/22/19	ATTENTION TO COMMITTEE MATTERS; PREPARE MEETING AGENDA	LUCIAN, JOHN	008	1.00	715.00
05/23/19	ATTENTION TO INQUIRY FROM CREDITOR RE WELDED'S BANKRUPTCY CASES.	BIBILONI, JOSE	008	0.10	41.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE  
FILE NUMBER: 154278-01600

PAGE NUMBER: 7  
INVOICE NO. 1826888  
JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/23/19	COORDINATE UPCOMING CALL WITH COMMITTEE MEMBERS AND THEIR COUNSEL.	BIBILONI, JOSE	008	0.20	82.00
05/23/19	ASSIST J. LUCIAN PREPARE FOR WEEKLY COMMITTEE CALL.	BIBILONI, JOSE	008	0.20	82.00
05/23/19	PREPARE FOR AND PARTICIPATE IN COMMITTEE WEEKLY CALL	LUCIAN, JOHN	008	1.00	715.00
05/23/19	PREPARE FOR (.4); AND ATTEND COMMITTEE TELECONFERENCE (.4)	MINTZ, JOSEF	008	0.80	456.00
05/23/19	PARTICIPATE IN COMMITTEE CALL	SCHAEDLE, MICHAEL	008	0.20	162.00
05/28/19	PREPARE FOR (.3) AND ATTEND PROFESSIONALS CALL (.6); DEBRIEF WITH J. LUCIAN AND C. BOGUSLASKI REGARDING SAME (.4); DRAFT AND SEND REPORT TO M. SCHAEDELE AND J. LUCIAN (.5)	MINTZ, JOSEF	008	1.50	855.00
05/31/19	EMAILS WITH COMMITTEE MEMBER RE: CLAIMS	LUCIAN, JOHN	008	0.20	143.00
<b>008 CREDITORS COMMITTEE (INTERNAL/COMMUNICATION W/CREI</b>				<b>23.70</b>	<b>14,073.00</b>
<b>TASK: 009 EMPLOYEE BENEFITS AND PENSION</b>					
05/02/19	REVIEW PENSION CLAIM MATTERS; EMAILS WITH RUDOLPH AND DEBTOR RE: SAME	LUCIAN, JOHN	009	0.40	286.00
05/02/19	INITIAL REVIEW OF CST TOLLING AGREEMENT	SCHAEDLE, MICHAEL	009	0.40	324.00
05/03/19	ATTENTION TO PENSION CLAIM MATTERS	LUCIAN, JOHN	009	0.30	214.50
05/03/19	REVIEW SETTLEMENT AGREEMENT RELATING TO LEGACY WITHDRAWAL LIABILITY; COMMENTS TO BANKRUPTCY TEAM	RUDOLPH, ANDREW	009	1.10	1,017.50
05/03/19	NOTES TO AND FROM A. RUDOLPH REGARDING CST TOLLING AGREEMENT	SCHAEDLE, MICHAEL	009	0.20	162.00
05/03/19	DISCUSS CST TOLLING AGREEMENT WITH J. LUCIAN	SCHAEDLE, MICHAEL	009	0.20	162.00
05/03/19	REVIEW AND COMMENT ON CST TOLLING AGREEMENT	SCHAEDLE, MICHAEL	009	0.80	648.00
05/06/19	ADDITIONAL REVIEW OF CST CLAIMS	SCHAEDLE, MICHAEL	009	1.00	810.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE  
FILE NUMBER: 154278-01600

PAGE NUMBER: 8  
INVOICE NO. 1826888  
JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/07/19	REVIEW PENSION CLAIM ISSUES AND DISCUSS WITH SANDSTROM	LUCIAN, JOHN	009	0.80	572.00
05/07/19	NOTE TO A. MIELKE ON CST TOLLING AGREEMENT	SCHAEDLE, MICHAEL	009	0.20	162.00
05/07/19	NOTES TO AND FROM A. RUDOLPH, J. LUCIAN AND G. SANDSTROM ON CST ISSUES	SCHAEDLE, MICHAEL	009	0.30	243.00
05/07/19	REVIEW AND COMMENT ON CST TOLLING AGREEMENT	SCHAEDLE, MICHAEL	009	0.40	324.00
05/08/19	ATTENTION TO CENTRAL STATES TOLLING AGREEMENT	LUCIAN, JOHN	009	0.50	357.50
05/10/19	CORRESPOND WITH J. LUCIAN AND M. SCHAEDELE REGARDING LETTER TO BECHTEL ON TOLLING OF ANY INDEMNIFICATION CLAIM	SANDSTROM, FREDERICK	009	0.30	183.00
05/10/19	REVIEW CST TOLLING AGREEMENT AND NOTES TO AND FROM G. SANDSTROM AND J. LUCIAN (.3)	SCHAEDLE, MICHAEL	009	0.80	648.00
05/13/19	FOLLOW UP ON CENTRAL STATES/BECHTEL TOLLING AGREEMENT; STRATEGY WITH SANDSTROM RE: RESERVATION OF RIGHTS; EMAILS WITH COUNSEL RE: SAME	LUCIAN, JOHN	009	0.80	572.00
05/13/19	DRAFT LETTER TO BECHTEL REGARDING RESERVATION OF RIGHT TO SEEK CONTRIBUTION OR INDEMNIFICATION FOR ERISA WITHDRAWAL LIABILITY	SANDSTROM, FREDERICK	009	0.80	488.00
05/13/19	NOTE TO AND FROM M. ROSENTHAL REGARDING RIGHTS RESERVATION LETTER ON CST TOLLING	SCHAEDLE, MICHAEL	009	0.20	162.00
05/13/19	NOTE TO AND FROM G. SANDSTROM, J. LUCIAN AND J. MINTZ ON RIGHTS RESERVATION LETTER ON CST TOLLING	SCHAEDLE, MICHAEL	009	0.20	162.00
05/13/19	REVIEW RIGHTS RESERVATION LETTER ON CST TOLLING TO M. ROSENTHAL	SCHAEDLE, MICHAEL	009	0.30	243.00
05/16/19	ATTENTION TO CENTRAL STATES PENSION MATTERS AND EMAILS	LUCIAN, JOHN	009	0.20	143.00
05/22/19	ATTENTION TO PENSION MATTERS	LUCIAN, JOHN	009	0.20	143.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE  
FILE NUMBER: 154278-01600

PAGE NUMBER: 9  
INVOICE NO. 1826888  
JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/22/19	REVIEW FINAL FORM OF CST TOLLING AGREEMENT AND RELATED NOTES FROM COUNTERPARTIES	SCHAEDLE, MICHAEL	009	0.30	243.00
05/28/19	REVIEW PROPOSED HAWKINS COMPENSATION SHARING WITH BECHTEL AND DISCUSS WITH TENEO AND MINTZ	LUCIAN, JOHN	009	0.50	357.50
05/30/19	STRATEGY WITH SCHAEDLE RE: KEIP ISSUES	LUCIAN, JOHN	009	0.20	143.00
	<b>009 EMPLOYEE BENEFITS AND PENSION</b>			<b>11.40</b>	<b>8,770.00</b>
<b>TASK: 013 FEE APPLICATIONS - INTERNAL</b>					
05/10/19	DISCUSS BLANK ROME SECOND INTERIM FEE APPLICATION WITH C. LEWIS.	BIBILONI, JOSE	013	0.10	41.00
05/10/19	DRAFT BLANK ROME'S SECOND INTERIM/QUARTERLY FEE APPLICATION FOR THE PERIOD FROM JANUARY 1, 2019 THROUGH MARCH 31, 2019	LEWIS, CHRISTOPHER	013	3.80	1,273.00
05/13/19	REVIEW DRAFT OF BLANK ROME SECOND INTERIM APPLICATION PREPARED BY C. LEWIS.	BIBILONI, JOSE	013	0.20	82.00
05/13/19	REVISE BLANK ROME'S SECOND INTERIM/QUARTERLY FEE APPLICATION	LEWIS, CHRISTOPHER	013	0.60	201.00
05/14/19	REVIEW CNO IN CONNECTION WITH BLANK ROME MARCH FEE APPLICATION (.1); CONFER WITH C. LEWIS RE FILING SAME (.1).	BIBILONI, JOSE	013	0.20	82.00
05/14/19	FURTHER ATTENTION TO BLANK ROME SECOND INTERIM FEE APPLICATION AND REVIEW OF SAME (.1); CALLS WITH C. LEWIS AND J. MINTZ RE SAME (.2).	BIBILONI, JOSE	013	0.30	123.00
05/14/19	REVIEW DOCKET AND DRAFT CERTIFICATE OF NO OBJECTION REGARDING BLANK ROME'S FIFTH MONTHLY (MARCH 2019) FEE APPLICATION (.3); PREPARE AND E-FILE SAME (.2)	LEWIS, CHRISTOPHER	013	0.50	167.50
05/14/19	ATTENTION TO SECOND INTERIM FEE APPLICATION	LUCIAN, JOHN	013	0.20	143.00
05/15/19	DRAFT AND SEND NOTE TO M. SCHAEDLE RE BLANK ROME SECOND INTERIM FEE APPLICATION.	BIBILONI, JOSE	013	0.10	41.00



WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE  
FILE NUMBER: 154278-01600

PAGE NUMBER: 10  
INVOICE NO. 1826888  
JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/15/19	PREPARE, E-FILE AND SERVE BLANK ROME'S SECOND INTERIM FEE APPLICATION FOR THE PERIOD JANUARY 1, 2019 THROUGH MARCH 31, 2019	LEWIS, CHRISTOPHER	013	0.50	167.50
05/15/19	REVIEW AND APPROVE SECOND BLANK ROME INTERIM FEE APPLICATION FOR FILING	MINTZ, JOSEF	013	0.50	285.00
05/23/19	CONFER WITH J. LUCIAN RE BLANK ROME APRIL FEE APPLICATION.	BIBILONI, JOSE	013	0.10	41.00
05/31/19	EMAILS WITH A. STEPANYANTS (TENEO) RE CNOS FILED FOR BLANK ROME AND TENEO MARCH FEE APPLICATIONS.	BIBILONI, JOSE	013	0.20	82.00
<b>013 FEE APPLICATIONS - INTERNAL</b>				<b>7.30</b>	<b>2,729.00</b>
<b>TASK: 014 FEE APPLICATIONS - OTHERS (INCLUDES REVIEW AND OBJECTIONS</b>					
05/08/19	REVIEW TENEO CNO DRAFT SENT BY C. LEWIS AND EMAILS WITH TENEO TEAM RE SECOND INTERIM FEE APPLICATION.	BIBILONI, JOSE	014	0.30	123.00
05/13/19	EMAIL FROM A. STEPANYANTS RE TENEO'S SECOND INTERIM FEE APPLICATION (.1); REVIEW AND COMMENT ON SAME (.1).	BIBILONI, JOSE	014	0.20	82.00
05/14/19	EMAILS AND CALLS WITH A. STEPANYANTS (TENEO) RE COMMENTS TO TENEO SECOND INTERIM FEE APPLICATION (.2); CALLS WITH C. LEWIS RE SAME AND FURTHER REVIEW OF SAME (.2).	BIBILONI, JOSE	014	0.40	164.00
05/14/19	REVIEW AND REVISE TENEO'S SIXTH MONTHLY (APRIL 2019) FEE APPLICATION (.3); SPEAK WITH J. BIBILONI RE SAME (.1)	LEWIS, CHRISTOPHER	014	0.40	134.00
05/14/19	REVIEW AND REVISE TENEO'S SECOND INTERIM FEE APPLICATION (.4); SPEAK WITH J. BIBILONI RE SAME (.1)	LEWIS, CHRISTOPHER	014	0.50	167.50
05/15/19	ATTENTION TO FINALIZING TENEO'S SECOND INTERIM FEE APPLICATION AND DISCUSS FILING AND SERVING SAME WITH C. LEWIS.	BIBILONI, JOSE	014	0.20	82.00
05/15/19	DRAFT NOTICE OF TENEO'S SECOND INTERIM FEE APPLICATION	LEWIS, CHRISTOPHER	014	0.30	100.50

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE  
FILE NUMBER: 154278-01600

PAGE NUMBER: 11  
INVOICE NO. 1826888  
JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/15/19	PREPARE, E-FILE AND SERVE TENEO CAPITAL'S SECOND INTERIM FEE APPLICATION FOR THE PERIOD JANUARY 1, 2019 THROUGH MARCH 31, 2019	LEWIS, CHRISTOPHER	014	0.50	167.50
05/15/19	REVIEW AND APPROVE FOR FILING SECOND INTERIM APPLICATION OF TENEO	MINTZ, JOSEF	014	0.30	171.00
05/16/19	REVIEW TENEO APRIL FEE APPLICATION AND DISCUSS SAME WITH C. LEWIS.	BIBILONI, JOSE	014	0.10	41.00
05/20/19	REVIEW AND FINALIZE TENEO APRIL MONTHLY FEE APPLICATION FOR FILING (.2); COMMUNICATIONS WITH C. LEWIS RE FILING AND SERVING SAME (.1).	BIBILONI, JOSE	014	0.30	123.00
05/20/19	PREPARE, E-FILE AND SERVE TENEO CAPITAL'S SIXTH MONTHLY (APRIL 2019) MONTHLY FEE APPLICATION	LEWIS, CHRISTOPHER	014	0.50	167.50
<b>014 FEE APPLICATIONS - OTHERS (INCLUDES REVIEW AND OBJECTI</b>				<b>4.00</b>	<b>1,523.00</b>
<b>TASK: 016 INSURANCE ISSUES</b>					
05/01/19	DISCUSS LITIGATION FUNDING STIPULATION AND WILLIAMS COMPLAINT WITH J. LUCIAN	SCHAEDLE, MICHAEL	016	0.30	243.00
05/01/19	REVIEW CHUBB BOND, INDEMNITY AGREEMENT AND STATUS REPORTS ON CHUBB PAYMENTS	SCHAEDLE, MICHAEL	016	1.00	810.00
05/01/19	DISCUSS LITIGATION FUNDING STIPULATION AND WILLIAMS COMPLAINT WITH J. LUCIAN	SCHAEDLE, MICHAEL	016	1.20	972.00
05/02/19	ATTENTION TO CHUBB SETTLEMENT MATTERS	LUCIAN, JOHN	016	0.40	286.00
05/02/19	INITIAL REVIEW OF MOTION TO APPROVE LITIGATION FUNDING MOTION	SCHAEDLE, MICHAEL	016	0.50	405.00
05/03/19	ATTENTION TO CHUBB SHARING AGREEMENT DOCUMENTATION; REVIEW WITH SCHAEDLE	LUCIAN, JOHN	016	0.50	357.50

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE  
FILE NUMBER: 154278-01600

PAGE NUMBER: 12  
INVOICE NO. 1826888  
JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/03/19	REVIEW AND REVISE CHUBB LITIGATION FUNDING MOTION; FINALIZE COOPERATION AGREEMENT (.3); NOTES TO AND FROM M. COLLINS, S. BEACH AND OTHER CHUBB/DEBTOR TEAM MEMBERS WITH COMMENTS AND RELATED NOTES (.5)	SCHAEDLE, MICHAEL	016	2.40	1,944.00
05/07/19	ATTENTION TO CHUBB SURETY CLAIMS PAYMENT STATUS	LUCIAN, JOHN	016	0.40	286.00
05/16/19	REVIEW REPORTS ON CHUBB CLAIM PAYMENTS	SCHAEDLE, MICHAEL	016	0.80	648.00
	<b>016 INSURANCE ISSUES</b>			<b>7.50</b>	<b>5,951.50</b>
<b>TASK: 017 INVESTIGATION OF COMPANY</b>					
05/14/19	DEVELOP ACTION PLAN FOR BECHTEL, CONSIDERING CST AND CLAIM ISSUES	SCHAEDLE, MICHAEL	017	1.30	1,053.00
05/16/19	ADDITIONAL ATTENTION TO BECHTEL ACTION PLAN	SCHAEDLE, MICHAEL	017	2.50	2,025.00
05/17/19	ANALYZE BECHTEL CLAIM ISSUES	LUCIAN, JOHN	017	0.80	572.00
05/20/19	EMAILS WITH J. MINTZ RE NEW DOCUMENTS PRODUCED BY THE DEBTORS (.1); REVIEW AND ORGANIZE SAME (.4).	BIBILONI, JOSE	017	0.50	205.00
05/20/19	EMAILS WITH R. POPPITI REGARDING DOCUMENT PRODUCTION (.2); EMAILS WITH TENEO REGARDING SAME (.2); EMAIL TO J. BIBILONI REGARDING SAME (.1)	MINTZ, JOSEF	017	0.50	285.00
05/21/19	FURTHER REVIEW AND ORGANIZE ADDITIONAL DOCUMENTS PRODUCED BY THE DEBTORS (.2); EMAILS WITH J. MINTZ RE SAME (.1).	BIBILONI, JOSE	017	0.30	123.00
05/22/19	CALL FROM A. STEPANYANTS REGARDING DOCUMENT REVIEW	MINTZ, JOSEF	017	0.20	114.00
05/24/19	ADDITIONAL WORK ON BECHTEL/PLAN ACTION REQUIREMENTS	SCHAEDLE, MICHAEL	017	0.80	648.00
05/30/19	DISCUSS DISCOVERY ISSUES WITH J. MINTZ AND ATTENTION TO EMAILS WITH R. POPPITI (YCST) RE SAME.	BIBILONI, JOSE	017	0.20	82.00
05/30/19	STRATEGY WITH SCHAEDLE AND MINTZ RE: BECHTEL ISSUES; EMAILS WITH YCST RE: SAME	LUCIAN, JOHN	017	0.50	357.50

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE  
FILE NUMBER: 154278-01600

PAGE NUMBER: 13  
INVOICE NO. 1826888  
JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/30/19	REVIEW DOCUMENTS PRODUCED BY DEBTORS	MINTZ, JOSEF	017	1.10	627.00
05/30/19	STRATEGIZE REGARDING BECHTEL AND RELATED MATTERS WITH J. LUCIAN	SCHAEDLE, MICHAEL	017	0.30	243.00
05/31/19	CONFER WITH J. MINTZ RE DOCUMENTS PRODUCED BY THE DEBTORS.	BIBILONI, JOSE	017	0.10	41.00
05/31/19	EMAILS WITH DEBTOR RE: BECHTEL DOCUMENTS	LUCIAN, JOHN	017	0.40	286.00
05/31/19	EMAILS WITH R. POPITTI REGARDING DISCOVERY REQUESTS AND FURTHER CALL	MINTZ, JOSEF	017	0.40	228.00
	<b>017 INVESTIGATION OF COMPANY</b>			<b>9.90</b>	<b>6,889.50</b>
<b>TASK: 019 LITIGATION</b>					
05/01/19	PREPARE FOR (.5) AND ATTEND CALL WITH GOPHER COUNSEL REGARDING SETTLEMENT (.5); FOLLOW UP CALL WITH GOPHER'S COUNSEL (.4); CALLS AND EMAILS THROUGHOUT THE DAY WITH DEBTORS' COUNSEL REGARDING SETTLEMENT AND RELATED ISSUES (1.2); REVIEW REBID ON GOPHER CLAIM (.4); AND STRATEGIZE WITH M. SCHAEDEL AND J. LUCIAN (.5); EMAILS WITH GOPHER'S COUNSEL AND DEBTORS COUNSEL REGARDING REBID (.5)	MINTZ, JOSEF	019	4.00	2,280.00
05/01/19	REVIEW DRAFT WILLIAMS COMPLAINT	SCHAEDLE, MICHAEL	019	1.00	810.00
05/02/19	PREPARE FOR (.2) AND PARTICIPATE IN CONFERENCE WITH GOPHER, DEBTORS AND CGT REGARDING SETTLEMENT MECHANICS AND NEXT STEPS (.4)	MINTZ, JOSEF	019	0.60	342.00
05/02/19	EMAILS WITH COUNSEL TO GOPHER REGARDING SETTLEMENT AND COMMITTEE APPROVAL (.4); CALL WITH R. POPPITI REGARDING SETTLEMENT STATUS (.3)	MINTZ, JOSEF	019	0.70	399.00
05/03/19	ANALYZE PRIME NDT LITIGATION MATTERS	LUCIAN, JOHN	019	0.40	286.00
05/03/19	REVIEW AND CIRCULATE FILED WILLIAMS COMPLAINT	MINTZ, JOSEF	019	0.40	228.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE  
FILE NUMBER: 154278-01600

PAGE NUMBER: 14  
INVOICE NO. 1826888  
JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/03/19	STRATEGIZE WITH M. SCHAEDEL REGARDING LITIGATION FUNDING AGREEMENT	MINTZ, JOSEF	019	0.40	228.00
05/03/19	DISCUSS PRIME NDT MOTION TO DISMISS AND PROMISE MOTION TO WITHDRAW REFERENCE	SCHAEDEL, MICHAEL	019	0.30	243.00
05/03/19	FINAL REVIEW OF WILLIAMS COMPLAINT	SCHAEDEL, MICHAEL	019	0.90	729.00
05/03/19	ADDITIONAL REVIEW PRIME NDT MOTION TO DISMISS AND RELATED AGREEMENT	SCHAEDEL, MICHAEL	019	1.30	1,053.00
05/06/19	NOTE TO AND FROM M. NEIBERG REGARDING SEALING MATTERS IN RESPECT OF WILLIAMS COMPLAINT	SCHAEDEL, MICHAEL	019	0.20	162.00
05/06/19	STRATEGIZE REGARDING PRIME NDT REFERENCE WITHDRAWAL ISSUES	SCHAEDEL, MICHAEL	019	1.00	810.00
05/06/19	STRATEGIZE REGARDING WILLIAMS LITIGATION AND ACTION PLAN	SCHAEDEL, MICHAEL	019	1.00	810.00
05/07/19	ANALYZE KEY STATUTES TO CONFIRM THAT PROPOSED TOLLING AGREEMENT FULLY PROTECTS CLIENT'S LEGAL RIGHTS	SANDSTROM, FREDERICK	019	0.80	488.00
05/09/19	REVIEW PRIME NDT OBJECTION TO MOTION DISMISS AND RELATED RELIEF	SCHAEDEL, MICHAEL	019	1.00	810.00
05/10/19	EMAILS WITH M. SCHAEDEL, J. LUCIAN, AND J. MINTZ RE DEBTORS' OPPOSITION TO PRIME NDT MOTION TO WITHDRAW THE REFERENCE (.2); DISCUSS SAME WITH J. MINTZ (.1).	BIBILONI, JOSE	019	0.30	123.00
05/10/19	REVIEW RESPONSE TO PRIME/NDT MOTION FOR WITHDRAWAL OF THE REFERENCE (.1); EMAIL TO J. LUCIAN REGARDING SAME (.2)	MINTZ, JOSEF	019	0.30	171.00
05/10/19	COMMENT ON PRIME NDT OBJECTION; NOTES TO AND FROM J. LUCIAN AND J. MINTZ REGARDING SAME (.3)	SCHAEDEL, MICHAEL	019	0.10	81.00
05/17/19	REVIEW DEBTORS' MOTION TO EXTEND REMOVAL DEADLINE (.3); EMAIL TO J. LUCIAN AND M. SCHAEDEL REGARDING SAME (.2)	MINTZ, JOSEF	019	0.50	285.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE  
FILE NUMBER: 154278-01600

PAGE NUMBER: 15  
INVOICE NO. 1826888  
JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/21/19	REVIEW DRAFT GOPHER MATS SETTLEMENT AND J. MINTZ COMMENTS TO SAME.	BIBILONI, JOSE	019	0.30	123.00
05/21/19	ATTENTION TO PRIME NDT LITIGATION MATTERS	LUCIAN, JOHN	019	0.40	286.00
05/21/19	REVIEW AND COMMENT ON GOPHER SETTLEMENT AGREEMENT (1.7); EMAIL TO M. SCHAEDELE AND J. LUCIAN REGARDING SAME (.2)	MINTZ, JOSEF	019	1.90	1,083.00
05/22/19	CALL WITH R. POPITTI REGARDING GOPHER SETTLEMENT AGREEMENT AND KEITH MOTION FOR RELIEF FROM STAY	MINTZ, JOSEF	019	0.50	285.00
05/22/19	REVIEW AND REVISE GOPHER SETTLEMENT AGREEMENT (1.3); REVIEW COLUMBIA GAS AGREEMENT (.5); EMAIL TO M. SCHAEDELE REGARDING SAME (.2)	MINTZ, JOSEF	019	2.00	1,140.00
05/23/19	FINALIZE COMMENTS TO GOPHER SETTLEMENT AGREEMENT (.7) AND EMAIL TO R. POPPITI REGARDING SAME (.2)	MINTZ, JOSEF	019	0.90	513.00
05/24/19	EMAILS WITH A. MIELKE (YCST) RE MOTION TO COMPEL PRIME NDT TO COMPLY WITH ESCROW AGREEMENT AND MOTION TO SHORTEN IN CONNECTION WITH SAME (.1); REVIEWING SAME AND ATTENTION TO EMAIL FROM J. MINTZ CONTAINING COMMENTS TO SAME (.1).	BIBILONI, JOSE	019	0.20	82.00
05/24/19	REVIEW AND COMMENT ON MOTION TO COMPEL PRIME NDT TO RELEASE FUNDS FROM ESCROW (.7); REVIEW MOTION TO SHORTEN (.3); EMAIL TO A. MIELKE REGARDING SAME (.3)	MINTZ, JOSEF	019	1.30	741.00
05/28/19	UPDATE FROM DEBTOR RE: WILLIAMS AND PRIME NDT LITIGATIONS	LUCIAN, JOHN	019	0.20	143.00
05/28/19	REVIEW PRIME/NDT ESCROW ISSUES	SCHAEDELE, MICHAEL	019	0.30	243.00
05/29/19	REVIEW STATUS OF MOTION TO COMPEL PAYMENT OF ESCROW BY PRIMENDT (.2); REVIEW CERTIFICATE OF COUNSEL (.2); EMAILS WITH YOUNG CONAWAY REGARDING HEARING STATUS (.2)	MINTZ, JOSEF	019	0.60	342.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE  
FILE NUMBER: 154278-01600

PAGE NUMBER: 16  
INVOICE NO. 1826888  
JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/30/19	STRATEGIZE WITH J. LUCIAN REGARDING DOCUMENT REVIEW AND OPEN ISSUES	MINTZ, JOSEF	019	0.40	228.00
05/30/19	REVIEW RESPONSE TO MOTION TO DISMISS BY PRIME NDT	MINTZ, JOSEF	019	1.20	684.00
05/31/19	REVIEW AND ANALYZE DEBTORS' DRAFT OPPOSITION TO PRIME NDT'S MOTION TO DISMISS PER J. LUCIAN REQUEST (.4); CONFER WITH J. LUCIAN RE SAME (.1).	BIBILONI, JOSE	019	0.50	205.00
05/31/19	REVIEW AND REVISE DEBTOR RESPONSE TO PRIME MOTION TO DISMISS COMPLAINT (1.1); CALL/EMAILS WITH DEBTOR RE: SAME (.4); STRATEGY WITH MINTZ RE: SAME (.2)	LUCIAN, JOHN	019	1.70	1,215.50
05/31/19	REVIEW RESPONSE TO MOTION TO DISMISS BY PRIMENDT (.4); STRATEGIZE WITH J. LUCIAN REGARDING SAME (.2)	MINTZ, JOSEF	019	0.60	342.00
<b>019 LITIGATION</b>				<b>28.20</b>	<b>17,993.50</b>
<b>TASK: 020 NON-WORKING TRAVEL</b>					
05/06/19	NONWORKING ROUNDTRIP TRAVEL TO DE	LUCIAN, JOHN	020	2.00	NO CHARGE
<b>020 NON-WORKING TRAVEL</b>				<b>2.00</b>	<b>0.00</b>
<b>TASK: 021 OMNIBUS COURT HEARING - PREPARATION/ ATTENDANCE</b>					
05/28/19	REVIEW HEARING AGENDA FOR MAY 30 HEARING.	BIBILONI, JOSE	021	0.10	41.00
05/28/19	REVIEW NOTICE OF HEARING ON MOTION TO COMPEL PAYMENT OF ESCROW BY PRIMENDT (.2); EMAIL TO CASETEAM REGARDING SAME (.1)	MINTZ, JOSEF	021	0.30	171.00
05/30/19	REVIEW CANCELLATION AGENDA FOR HEARING (.1); EMAILS WITH A. MEILKE REGARDING SAME (.1); EMAIL TO CASE TEAM REGARDING SAME (.1)	MINTZ, JOSEF	021	0.30	171.00
<b>021 OMNIBUS COURT HEARING - PREPARATION/ ATTENDANCE</b>				<b>0.70</b>	<b>383.00</b>
<b>TASK: 022 PLAN AND DISCLOSURE STATEMENT</b>					

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE  
FILE NUMBER: 154278-01600

PAGE NUMBER: 17  
INVOICE NO. 1826888  
JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/17/19	EMAILS WITH M. SCHAEDELE, J. LUCIAN, AND J. MINTZ RE DEBTORS' PLAN EXCLUSIVITY PERIOD AND DEADLINE TO REMOVE CIVIL ACTIONS (.1); REVIEW MOTION TO EXTEND EXCLUSIVITY PERIOD AND MOTION TO EXTEND DEADLINE TO REMOVE CIVIL ACTIONS FILED BY THE DEBTORS AND FURTHER EMAILS WITH J. MINTZ RE SAME (.2).	BIBILONI, JOSE	022	0.30	123.00
05/17/19	REVIEW MOTION TO EXTEND EXCLUSIVITY (.4); EMAIL TO M. SCHAEDELE AND J. LUCIAN REGARDING SAME (.2)	MINTZ, JOSEF	022	0.60	342.00
05/21/19	REVIEW MOTION TO EXTEND EXCLUSIVITY AND RELATED NOTES FROM TEAM	SCHAEDELE, MICHAEL	022	0.30	243.00
	<b>022 PLAN AND DISCLOSURE STATEMENT</b>			<b>1.20</b>	<b>708.00</b>
	<b>TASK: 024 RELIEF FROM STAY AND ADEQUATE PROTECTION</b>				
05/03/19	ATTENTION TO LIFT STAY MATTERS AND REVIEW WITH MINTZ	LUCIAN, JOHN	024	0.20	143.00
05/09/19	REVIEW AND ANALYZE CADD ENTERPRISES MOTION TO LIFT THE AUTOMATIC STAY AND SEND SUMMARY OF SAME TO J. LUCIAN AND J. MINTZ.	BIBILONI, JOSE	024	0.30	123.00
05/09/19	EMAILS WITH R. POPPITI REGARDING STAY RELIEF STIPULATION (.2); REVIEW AND COMMENT ON STIPULATION (.4);	MINTZ, JOSEF	024	0.60	342.00
05/10/19	REVIEW AND COMMENT ON FORM OF STIPULATION FOR STAY RELIEF WITH TIBBS AND PIPER (.4); EMAIL TO R. POPPITI REGARDING SAME (.2)	MINTZ, JOSEF	024	0.60	342.00
05/13/19	EMAILS WITH J. MINTZ RE HEARING AND OBJECTION DEADLINE IN CONNECTION WITH CADD ENTERPRISES' MOTION TO LIFT THE AUTOMATIC STAY.	BIBILONI, JOSE	024	0.10	41.00
05/13/19	EMAILS WITH J. BIBILONI REGARDING CADD STAY RELIEF MOTION	MINTZ, JOSEF	024	0.30	171.00



WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE  
FILE NUMBER: 154278-01600

PAGE NUMBER: 18  
INVOICE NO. 1826888  
JULY 03, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
05/14/19	REVIEW DRAFT STIPULATION WITH TIBBS FOR STAY RELIEF (.2); AND EMAIL TO R. POPITTI REGARDING SAME (.2)	MINTZ, JOSEF	024	0.40	228.00
05/14/19	REVIEW AND REVISE CADD STAY RELIEF MOTION (.4); EMAILS WITH A. MIELKE REGARDING SAME (.3)	MINTZ, JOSEF	024	0.70	399.00
05/15/19	REVIEW HEARING AGENDA (.2); REVIEW REVISED PROPOSED ORDER (.2); EMAILS WITH COUNSEL TO DEBTORS AND CADD REGARDING REVISED PROPOSED ORDER (.3); DRAFT UPDATE TO COMMITTEE REGARDING MOTION STATUS (.4)	MINTZ, JOSEF	024	1.10	627.00
05/15/19	REVIEW CADD STAY RELIEF MOTION	SCHAEDEL, MICHAEL	024	0.30	243.00
05/16/19	ATTENTION TO LIFT STAYS AND RELATED MATTERS	LUCIAN, JOHN	024	0.30	214.50
05/16/19	EMAILS WITH DEBTORS COUNSEL AND COUNSEL TO CADD REGARDING STAY RELIEF ORDER AND HEARING STATUS (.3); DISCUSSIONS WITH J. BIBILONI REGARDING HEARING PREPARATION (.2)	MINTZ, JOSEF	024	0.50	285.00
05/18/19	REVIEW TIBBS STIPULATION (.3); EMAIL TO R. POPPITI REGARDING SAME (.2)	MINTZ, JOSEF	024	0.50	285.00
05/20/19	ATTENTION TO ISSUES RELATED TO EXPRESS 4X4 MOTION FOR RELIEF FROM THE AUTOMATIC STAY AND EMAIL TO J. MINTZ RE SAME.	BIBILONI, JOSE	024	0.20	82.00
05/22/19	EMAILS WITH J. MINTZ RE KEITH LIFT STAY MOTION (.2); REVIEW AND REVISE DRAFT OBJECTION TO SAME AND SEND SAME TO J. MINTZ (.8).	BIBILONI, JOSE	024	1.00	410.00
05/22/19	ATTENTION TO PENDING MOTIONS AND MATTERS	LUCIAN, JOHN	024	0.30	214.50
05/22/19	REVIEW AND COMMENT ON DRAFT OBJECTION TO KEITH MOTION FOR RELIEF FROM STAY	MINTZ, JOSEF	024	0.40	228.00
05/28/19	UPDATE FROM DEBTOR RE: EXPRESS AND KEITH MOTIONS	LUCIAN, JOHN	024	0.10	71.50
<b>024 RELIEF FROM STAY AND ADEQUATE PROTECTION</b>				<b>7.90</b>	<b>4,449.50</b>
<b>TOTAL SERVICES</b>				<b>\$</b>	<b>74,198.00</b>

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
 COMMITTEE  
 FILE NUMBER: 154278-01600

PAGE NUMBER: 19  
 INVOICE NO. 1826888  
 JULY 03, 2019

**FOR DISBURSEMENTS ADVANCED THROUGH MAY 31, 2019**

DESCRIPTION	AMOUNT
DOCKET SEARCHES	126.90
REPRODUCTION OF DOCUMENTS	61.10
SPECIAL MAILING CHARGES	95.00
<b>TOTAL DISBURSEMENTS</b>	<b>\$ 283.00</b>

<b>CURRENT INVOICE TOTAL</b>	<b>\$ 74,481.00</b>
------------------------------	---------------------

**TIME AND FEE SUMMARY**

TIMEKEEPER	RATE	HOURS	FEES
ANDREW RUDOLPH	925.00	1.10	1,017.50
CHRISTOPHER A. LEWIS	335.00	12.60	4,221.00
FREDERICK G. SANDSTROM	610.00	1.90	1,159.00
JOHN E. LUCIAN	715.00	19.70	14,085.50
JOSE F. BIBILONI	410.00	15.00	6,150.00
JOSEF W. MINTZ	570.00	33.00	18,810.00
MICHAEL B. SCHAEDELE	810.00	35.50	28,755.00
<b>TOTALS</b>		<b>118.80</b>	<b>\$ 74,198.00</b>

**EXHIBIT E****SUMMARY AND DETAILS OF EXPENSE  
REIMBURSEMENT REQUESTED, BY CATEGORY  
(MAY 1, 2019 THROUGH MAY 31, 2019)**

<b>EXPENSE CATEGORY</b>	<b>SERVICE PROVIDER</b>	<b>TOTAL EXPENSES</b>
Reproduction of Documents	In-house / Parcels, Inc.	\$61.10
Mailing Charges	In-house / Parcels, Inc.	\$95.00
Docket Searches	PACER	\$126.90
<b>TOTAL:</b>		<b>\$283.00</b>

**CERTIFICATE OF SERVICE**

I, Jose F. Bibiloni hereby certify that on July 3, 2019, I served or caused to be served the foregoing *Seventh 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 May 1, 2019 through May 31, 2019*, including notice thereof, upon the following persons via U.S. first-class mail, postage fully pre-paid:

WELDED CONSTRUCTION, L.P. ET AL.  
Attn: Frank A. Pometti,  
Chief Restructuring Officer  
26933 Eckel Road  
Perrysburg, Ohio 43551

YOUNG CONAWAY STARGATT & TAYLOR, LLP  
Attn: Tara C. Pakrouh, Esq.  
Rodney Square  
1000 North King Street  
Wilmington, Delaware 19801

OFFICE OF THE UNITED STATES TRUSTEE  
FOR THE DISTRICT OF DELAWARE  
Attn: Jaclyn Weissgerber, Esq.  
Jane M. Leamy, Esq.  
J. Caleb Boggs Federal Building, Room 2207  
844 North King Street  
Wilmington, Delaware 19801

GIBSON, DUNN & CRUTCHER LLP  
Attn: Michael A. Rosenthal, Esq. and  
Matthew K. Kelsey, Esq.  
200 Park Avenue  
New York, New York 10166

/s/ Jose F. Bibiloni  
Jose F. Bibiloni (DE No. 6261)