

**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 No. 889**  
)

**CERTIFICATION OF COUNSEL REGARDING *PROPOSED* ORDER SUSTAINING  
DEBTORS’ SIXTH (6TH) OMNIBUS (SUBSTANTIVE) OBJECTION TO  
CLAIMS PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE,  
BANKRUPTCY RULE 3007 AND LOCAL RULE 3007-1**

On July 23, 2019, the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) filed the *Debtors’ Sixth (6th) Omnibus (Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1* [Docket No. 889] (the “**Omnibus Objection**”).<sup>2</sup>

Thereafter, Schuylkill County Municipal Authority (“**SCMA**”) filed a response to the Omnibus Objection [Docket No. 920] (the “**Response**”). No other responses to the Omnibus Objection were filed or otherwise received by the Debtors.

The Debtors have worked with SCMA to resolve its Response, and have done so through certain revisions to the Proposed Order and the exhibits attached thereto (the “**Revised Proposed Order**”). A copy of the Revised Proposed Order is attached hereto as Exhibit 1.<sup>3</sup> The Debtors submit that the Revised Proposed Order is appropriate and consistent with the Omnibus

<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.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Omnibus Objection.

<sup>3</sup> For ease of reference, attached hereto as Exhibit 2 is a copy of the Revised Proposed Order marked against the Proposed Order.

Objection and their discussions with SCMA, and that entry of the Revised Proposed Order is in the best interests of the Debtors, their estates, and their creditors. SCMA has consented to the Court's entry of the Revised Proposed Order.

Accordingly, the Debtors respectfully request the Court to enter the Revised Proposed Order at its earliest convenience without further notice or a hearing.

Dated: August 20, 2019  
Wilmington, Delaware

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