

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

WELDED CONSTRUCTION, L.P., *et al.*¹

Debtors.

Chapter 11

Case No. 18-12378 (KG)

(Jointly Administered)

Hearing Date: N/A

Objection Deadline: December 2, 2019 at 4:00 p.m. (ET)

**COMBINED SEVENTH 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 JULY 1, 2019
THROUGH AND INCLUDING SEPTEMBER 30, 2019**

Name of Applicant: Landis Rath & Cobb LLP

Authorized to Provide Professional
Services to: Special Counsel for the Debtor and Debtor-In-
Possession

Date of Retention: *Nunc Pro Tunc* to October 22, 2018

Period for which compensation
and reimbursement sought: July 1, 2019 through September 30, 2019

Amount of monthly fees to be approved
as actual, reasonable and necessary: \$29,588.00 (80% =\$23,670.40)

Amount of monthly expenses sought
as actual, reasonable and necessary: \$75.09

This is a X monthly interim final application

This application includes 2.3 hours with a value of \$747.50 for time incurred in the preparation of the sixth monthly fee application and third interim fee application.

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.



Prior Applications:

Dated Filed	Period Covered	Requested		Approved	
		Fees	Expenses	Fees	Expenses
12/5/18	10/22/18 – 11/30/18	\$141,548.50	\$5,989.81	\$113,238.80	\$5,989.81
1/22/19	12/1/18 – 12/31/18	\$87,400.00	\$689.79	\$69,920.00	\$689.79
1st Interim 2/14/19	10/22/18 – 12/31/18	\$228,948.50	\$6,679.60	\$183,158.80	\$6,679.60
2/26/19	1/1/19 – 1/31/19	\$11,978.00	\$334.67	\$9,582.40	\$334.67
3/15/19	2/1/19 – 2/28/19	\$20,332.00	\$102.30	\$16,265.60	\$102.30
5/15/19	3/1/19 – 3/31/19	\$1,618.50	\$7.50	\$1,294.80	\$7.50
2nd Interim 5/15/19	1/1/19 – 3/31/19	\$33,928.50	\$444.47	\$33,928.50	\$444.47
3rd Interim 8/15/19	4/1/19 – 6/30/19	\$2,403.00	\$1.30	\$2,403.00	\$1.30

MONTHLY COMPENSATION BY INDIVIDUAL

Name of Professional	Position w/LRC and Year of Admission	Year of Law School Graduation	Hourly Billing Rate²	Total Billed Hours	Total Compensation
Matthew B. McGuire	Partner; admitted PA 2001, DE 2003	May, 2000	\$650.00	20.8	\$13,520.00
Jennifer L. Cree	Associate; admitted DE 2013, PA 2014	May, 2013	\$365.00	43.20	\$15,768.00
Anthony C. Dellose	Paralegal	N/A	\$250.00	1.2	\$300.00
Total				65.20	\$29,588.00

Blended Hourly Rate: \$454² LRC's billing rates have not changed during this Application Period (defined below).

MONTHLY COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees
B124 – Claims Administration & Objections	62.5	\$28,729.00
B134 – Hearings	.4	\$111.50
B136 – LRC Retention & Fee Matters	2.3	\$747.50
TOTAL	65.2	\$29,588.00

MONTHLY EXPENSE SUMMARY

Expenses Category	Total Expenses
Copying	\$34.00
Online Research	\$11.55
Document Retrieval	\$5.86
Conference Call Service	\$23.68
TOTAL	\$75.09

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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 JULY 1, 2019
THROUGH AND INCLUDING SEPTEMBER 30, 2019**

Landis Rath & Cobb LLP ("LRC"), Special Counsel to the above-captioned debtors and debtors-in-possession (the "Debtors"), submits this *Combined Seventh 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 July 1, 2019 Through and Including September 30, 2019* (the "Application") for legal services performed during the period commencing July 1, 2019 through and including September 30, 2019 (the "Application Period"). In support of the Application, LRC respectfully represents as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This is a core proceeding within the meaning of 28 U.S.C. §

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.

157(b)(2)(A) and (M), and the Court may enter a final order consistent with Article III of the United States Constitution.² Venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are sections 105(a), 330 and 331 of chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (as amended or modified, the “Bankruptcy Code”).

BACKGROUND

3. On October 22, 2018 (the “Petition Date”), the Debtors commenced the above-captioned chapter 11 cases (the “Chapter 11 Cases”) by filing voluntary petitions for relief under chapter 11 of title 11 of the Bankruptcy Code.

4. The Debtors continue to operate their business and manage their properties as debtors-in-possession pursuant to Bankruptcy Code sections 1107(a) and 1108.

5. No trustee or examiner has been appointed in these Chapter 11 Cases.

6. On October 30, 2018, the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an official committee of unsecured creditors consisting of the following seven members: (i) Ohio Machinery Co.; (ii) Cleveland Brothers Equipment Co., Inc.; (iii) United Piping, Inc.; (iv) PipeLine Machinery International, LP; (v) Earth Pipeline Services, Inc.; (vi) IUOE and Pipe Line Employers Health & Welfare Fund; and (vii) Schmid Pipeline (the “Committee”) [D.I. 128].

² Pursuant to rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), LRC hereby confirms its consent to entry of a final order by the Bankruptcy Court in connection with this Application if it is later determined that the Bankruptcy Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

7. The factual background relating to the Debtors' commencement of the Chapter 11 Cases is set forth in detail in the *Declaration of Frank Pometti in Support of First Day Relief* [D.I. 4] filed on the Petition Date.

8. On November 15, 2018, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the "Interim Compensation Order") [D.I. 230]. The Interim Compensation Order sets forth the procedures for interim compensation and reimbursement of expenses for all professionals in these Chapter 11 Cases.

9. On November 15, 2018, the Court also entered the *Order Authorizing the Employment and Retention of Landis Rath & Cobb LLP as Special Counsel Nunc Pro Tunc to the Retention Date* [D.I. 232].

TERMS AND CONDITIONS OF COMPENSATION OF LRC

10. Subject to Court approval, LRC seeks payment for compensation on an hourly basis, plus reimbursement of actual, necessary expenses incurred by LRC during the Application Period. With the exception of copy charges (which are charged at a lower rate), the rates charged by LRC in these Chapter 11 Cases do not differ from the rates charged to LRC's non-bankruptcy clients.

11. A summary of the hours spent, the names of each professional and paraprofessional rendering services to the Debtors during the Application Period, the regular customary billing rates and the total value of time incurred by each of the LRC professionals rendering services to the Debtors are attached hereto as **Exhibit A**. A copy of the computer-generated time entries reflecting the time recorded for these services, organized in project billing categories in accordance with the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330* (the "U.S. Trustee Guidelines") is

attached hereto as **Exhibit B**. A statement of expenses incurred by LRC during the Application Period is attached hereto as **Exhibit C**. All time entries and requested expenses are in compliance with rule 2016-2 of the Local Rules.³

12. Pursuant to the Interim Compensation Order, LRC and other professionals retained in these Chapter 11 Cases are authorized to file and to serve upon the parties identified in the Interim Compensation Order monthly fee applications (a "Monthly Fee Application") of their fees and expenses. After the expiration of a twenty (20) day objection period, the Debtors are authorized to promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses requested in the Monthly Fee Application, unless an objection has been lodged against specific fees and/or expenses, or the Court orders otherwise.

13. In accordance with the Interim Compensation Order, LRC has filed and served upon the parties identified in the Interim Compensation Order this Application with respect to fees and expenses incurred during the Application Period; to wit, fees in the amount of \$29,588.00 and expenses in the amount of \$75.09.

14. All services and costs for which compensation is requested by LRC in this Application were reasonable and necessary and were performed for and on behalf of the Debtors during the Application Period.

CASE STATUS

15. The Debtors' monthly operating reports contain up-to-date information regarding the amount of cash on hand or on deposit in the Debtors' estates, the amount and nature of accrued unpaid administrative expenses, the Debtors' operating profits or losses, and the amount of unencumbered funds in the Debtors' estates.

³ LRC has also made reasonable efforts to submit this Application in a manner consistent with the U.S. Trustee Guidelines. To the extent that the U.S. Trustee Guidelines conflict with the Local Rules, in particular, Local Rule 2016-2, LRC has chosen to comply with such Local Rule. LRC will supplement this Application with additional detail or information upon request.

16. To the best of LRC's knowledge, the Debtors have paid or will pay to the U.S. Trustee its initial quarterly fees and have filed or will file its monthly operating reports.

**NARRATIVE SUMMARY OF SERVICES
RENDERED ON A PROJECT SUMMARY BASIS**

17. All of the professional services that LRC rendered to the Debtors during the Application Period are set forth in detail in **Exhibit B**, segregated according to project billing categories in accordance with the U.S. Trustee Guidelines. A brief description of certain services deserving specific mention are highlighted below, by project category:

(A) Claims Administration & Objections: (Total Hours: 62.5; Total Fees: \$28,729.00)

18. Among other services provided in this category during the Application Period, LRC analyzed certain purported claims arising out of certain contracts between the Debtors and Columbia Gas Transmission, LLC ("Columbia Gas"). In connection therewith, LRC researched various issues and drafted a claims analysis. LRC worked with the Debtors' management team and the Debtors' primary bankruptcy counsel regarding various issues related to Columbia Gas claims.

(B) LRC Retention/Fee Matters: (Total Hours: 2.3; Total Fees: \$747.50)

19. Among other services provided under this category during the Application Period, LRC prepared and filed the *Sixth Monthly and Third 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 April 1, 2019 Through and Including June 30, 2019* [D.I. 949] in accordance with the Interim Compensation Order, the Local Rules and the U.S. Trustee's Guidelines.

COMPENSATION REQUESTED

20. LRC expended 65.2 hours during the Application Period in furtherance of its efforts on behalf of the Debtors. LRC requests allowance of compensation in the amount of \$29,588.00 for legal services rendered during the Application Period at a blended hourly rate of \$454. Pursuant to the Interim Compensation Order, LRC requests interim payment of 80% of the total fees requested, or \$23,670.40. None of the requested fees detailed herein have been paid.

REIMBURSEMENT OF EXPENSES

21. During the Application Period, LRC incurred certain necessary expenses in rendering legal services to the Debtors as set forth in **Exhibit C**.⁴ LRC represents that its rate for duplication is \$0.10 per page, consistent with the Local Rules and U.S. Trustee Guidelines.

22. In order to more efficiently handle voluminous copying of pleadings served and filed in these Chapter 11 Cases, LRC on occasion retained third-party duplication service providers. LRC seeks reimbursement only for the actual expenses charged by such third-party service providers. In addition, LRC seeks reimbursement for, among other things, computer-assisted research, which is the actual cost of such charges.

23. LRC seeks reimbursement for its reasonable, necessary and actual expenses incurred during the Application Period for the total amount of \$75.09.

LEGAL STANDARD

24. Bankruptcy Code section 330(a)(1) allows the payment of:

(A) reasonable compensation for actual, necessary services rendered by the trustee, examiner, ombudsman, professional person, or attorney and by any paraprofessional person employed by any such person; and

⁴ **Exhibit C** sets forth in summary detail the expenses incurred during the Application Period. Actual copies of invoices from LRC's vendors are not attached, but are available for inspection upon request.

(B) reimbursement for actual, necessary expenses.

11 U.S.C. § 330(a)(1). Reasonableness of compensation is informed by the “market-driven approach,” which considers the nature, extent and value of services provided by the professional and the cost of comparable services in non-bankruptcy contexts. *See Zolfo Cooper & Co. v. Sunbeam-Oster Co.*, 50 F.3d 253, 258 (3d Cir. 1995); *In re Busy Beaver Building Ctr., Inc.*, 19 F.3d 833, 849 (3d Cir. 1994). Thus, the “baseline rule is for firms to receive their customary rates.” *Zolfo Cooper*, 50 F.3d at 259.

25. In accordance with its practices in non-bankruptcy matters, LRC has calculated its compensation requested in this Application by applying its standard hourly rates. LRC’s calculation is based upon hourly rates that are well within the range of rates that are charged by comparable firms in similar bankruptcy cases. Accordingly, LRC’s rates should be determined to be reasonable under Bankruptcy Code section 330.

26. LRC’s fees during the Application Period are also reasonable under the prevailing legal standard and should be allowed. The amount of these fees is not unusual given the complexity and size of the Chapter 11 Cases and the amount of work required to represent the Debtors as Special Counsel. LRC’s fees are commensurate with fees that other attorneys of comparable experience and expertise have charged and been awarded in similar chapter 11 cases. Accordingly, LRC’s fees are reasonable pursuant to Bankruptcy Code section 330.

27. Bankruptcy Code section 330(a)(1)(B) permits reimbursement for actual and necessary expenses. LRC’s legal services and expenses incurred during the Application Period are set forth in this Application and constitute only those necessary expenses that were incurred for the benefit of the Debtors’ estates. LRC has properly requested reimbursement of only actual, necessary and appropriate legal expenses.

28. Except as permitted by Bankruptcy Rule 2016, no agreement or understanding exists between LRC and/or any third person for the sharing or division of compensation. All of the services for which compensation is requested in this Application were rendered at the request of and solely on behalf of the Debtors.

29. Pursuant to the standards set forth in Bankruptcy Code sections 330 and 331, LRC submits that the compensation requested is for actual and necessary services and expenses, and is reasonable, based upon the nature, extent and value of such services, the time spent thereon, and the costs of comparable services in cases under the Bankruptcy Code.

30. The time records annexed to this Application constitute only a general statement of the services rendered and time expended without description of the pressure and constraints under which LRC actually rendered these services. The considerable challenges of these Chapter 11 Cases have been attended to and managed by LRC at all levels promptly, expertly, and often to the exclusion of other matters in LRC's office. LRC submits, therefore, that its fees and expenses were actually necessary, reasonable and justified, and should be allowed in full.

NOTICE AND NO PRIOR REQUEST

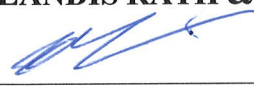
31. Notice of this Application has been given to the following parties or, in lieu of, to their counsel, if known: (a) the Debtors; (b) the U.S. Trustee; (c) the DIP Lenders (d) the Committee; and (e) all parties required to be given notice in the Interim Compensation Order. LRC submits that no other or further notice is necessary.

32. No prior request for the relief sought in this Application has been made to this or any other Court.

WHEREFORE, LRC respectfully requests that the Court (i) grant the Application and (ii) grant such further relief as is just and proper.

Dated: November 8, 2019
Wilmington, Delaware

LANDIS RATH & COBB LLP



Adam G. Landis (No. 3407)
Matthew B. McGuire (No. 4366)
Jennifer L. Cree (No. 5919)
919 Market Street, Suite 1800
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*Special Counsel to the Debtors and Debtors-
In-Possession*

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

In re:

WELDED CONSTRUCTION, L.P., *et al.*¹

Debtors.

Chapter 11

Case No. 18-12378 (KG)

(Jointly Administered)

Hearing Date: N/A

Objection Deadline: December 2, 2019 at 4:00 p.m. (ET)

NOTICE OF APPLICATION

TO: The above-captioned Debtors; Counsel to the Debtors; the Office of the United States Trustee for the District of Delaware; Counsel to the Committee; Counsel to the DIP Lender; and all parties required to be given notice in the Interim Compensation Order.

Landis Rath & Cobb LLP, Special Counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), has filed the ***Combined Seventh 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 July 1, 2019 Through and Including September 30, 2019*** (the “Application”). The Application seeks fees in the amount of \$29,588.00 (80% = \$23,670.40) and expenses in the amount of \$75.09 for the period July 1, 2019 through September 30, 2019.

Objections, if any, to the relief requested in the Application must be filed with the United States Bankruptcy Court, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **December 2, 2019 at 4:00 p.m. (ET)**.

At the same time, you must also serve a copy of the objection upon the following parties so as to be **received no later than 4:00 p.m. (ET) on December 2, 2019**:

(i) Welded Construction, L.P., 26933 Eckel Road, Perrysburg, OH 43551 (Attn: Frank A. Pometti, Chief Restructuring Officer); (ii) counsel to the Debtors, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801 (Attn: Tara C. Pakrouh, Esq.); (iii) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Federal Building, Room 2207, 844 North King Street, Wilmington, DE 19801, (Attn: Jaclyn Weissgerber, Esq. and Jane M. Leamy, Esq.); (iv) counsel for the DIP Lender, Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, NY 10166 (Attn: Michael A. Rosenthal, Esq. and Matthew K. Kelsey, Esq.); (v) special counsel to the Debtors, Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, DE 19801 (Attn: Matthew B. McGuire, Esq. and Jennifer L. Cree, Esq.); and (vi) counsel for the Committee, Blank Rome LLP, 130

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.

North 18th Street, Philadelphia, PA 19103 (Attn: John E. Lucian, Esq. and Michael B. Schaedle, Esq.).

PLEASE TAKE FURTHER NOTICE THAT PURSUANT TO THE ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR PROFESSIONALS, IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURE, THE DEBTORS WILL BE AUTHORIZED TO PAY 80% OF REQUESTED FEES AND 100% OF REQUESTED EXPENSES WITHOUT FURTHER COURT ORDER. ONLY IF AN OBJECTION IS PROPERLY AND TIMELY FILED IN ACCORDANCE WITH THE ABOVE PROCEDURE, WILL A HEARING BE HELD ON THE APPLICATION.

Dated: November 8, 2019
Wilmington, Delaware

LANDIS RATH & COBB LLP



Adam G. Landis (No. 3407)
Matthew B. McGuire (No. 4366)
Jennifer L. Cree (No. 5919)
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*Special Counsel to the Debtors and
Debtors-In-Possession*

EXHIBIT A

MONTHLY COMPENSATION BY INDIVIDUAL

Name of Professional	Position w/LRC and Year of Admission	Year of Law School Graduation	Hourly Billing Rate¹	Total Billed Hours	Total Compensation
Matthew B. McGuire	Partner; admitted PA 2001, DE 2003	May, 2000	\$650.00	20.8	\$13,520.00
Jennifer L. Cree	Associate; admitted DE 2013, PA 2014	May, 2013	\$365.00	43.2	\$15,768.00
Anthony C. Dellose	Paralegal	N/A	\$250.00	1.2	\$300.00
Total				65.20	\$29,588.00

¹ LRC's billing rates have not changed during this Application Period (defined below).

EXHIBIT B

MONTHLY COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees
B124 – Claims Administration & Objections	62.5	\$28,729.00
B134 – Hearings	.4	\$111.50
B136 – LRC Retention & Fee Matters	2.3	\$747.50
TOTAL	65.20	\$29,588.00

Date: 11/08/2019

Detail Fee Task Code Billing Report
Landis Rath & Cobb LLP

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Client	Trans Date	Tmkr	Hours to Bill	Amount	
Phase ID B124 Claims Administration & Objections					
1220.002	08/16/2019	JLC	0.10	36.50	review email from A. Mielke re: columbia gas
1220.002	08/16/2019	JLC	0.40	146.00	briefly review columbia gas documents and confer with MBM re: same
1220.002	08/26/2019	JLC	0.10	36.50	confer with MBM re: Columbia Gas issues
1220.002	08/26/2019	JLC	0.10	36.50	email to A. Mielke re: columbia gas
1220.002	08/26/2019	JLC	0.10	36.50	call with A. Mielke re: columbia gas issues
1220.002	08/26/2019	JLC	0.10	36.50	emails with A. Mielke re: claims analysis
1220.002	08/26/2019	JLC	2.40	876.00	continue to review columbia gas documents
1220.002	08/26/2019	MBM	3.80	2,470.00	review of Columbia gas transaction documents (3.7); emails with Cree and Melieke re: same (.1)
1220.002	08/27/2019	JLC	1.30	474.50	begin to review columbia gas docs
1220.002	08/28/2019	JLC	2.70	985.50	continue to review columbia gas documents
1220.002	08/29/2019	JLC	2.10	766.50	continue to review columbia gas docs
1220.002	09/03/2019	JLC	0.20	73.00	email from A. Mielke and briefly review columbia gas claim documents
1220.002	09/05/2019	JLC	0.10	36.50	emails with company re: columbia gas issues
1220.002	09/06/2019	JLC	1.30	474.50	prepare for and attend call with company, MBM, Alix, YCST re: columbia gas issues
1220.002	09/06/2019	MBM	3.70	2,405.00	call with Pometti and Beach re: Telephone conference with claims and status (1.1); prepare for same (.3); review of construction contracts and Zolfo analysis (2.3)
1220.002	09/09/2019	JLC	1.20	438.00	cofner with MBM re: columbia gas issues and continues to review documents
1220.002	09/09/2019	MBM	2.30	1,495.00	review of contracts and claims analysis (2.2); conference with Cree re: same (.1)
1220.002	09/16/2019	JLC	2.70	985.50	review columbia gas documents and summarize
1220.002	09/16/2019	MBM	2.90	1,885.00	further review of documents and prepare claims analysis
1220.002	09/17/2019	JLC	3.30	1,204.50	continue to review columbia gas contracts and summarize same
1220.002	09/17/2019	JLC	0.10	36.50	confer with MBM re: columbia gas contracts
1220.002	09/17/2019	JLC	1.00	365.00	call with YCST re: columbia gas issues
1220.002	09/17/2019	JLC	1.00	365.00	confer with MBM re: columbia gas issues
1220.002	09/17/2019	JLC	1.10	401.50	draft [REDACTED]
1220.002	09/17/2019	MBM	1.50	975.00	conference with Cree re: claims analysis (1.0) call with Beach re: same (.5)
1220.002	09/19/2019	JLC	0.10	36.50	confer with MBM re: columbia gas issues
1220.002	09/19/2019	JLC	0.40	146.00	review [REDACTED]
1220.002	09/20/2019	JLC	5.10	1,861.50	review columbia gas documents (1.0) [REDACTED] (4.1)
1220.002	09/21/2019	JLC	3.40	1,241.00	[REDACTED]
1220.002	09/23/2019	JLC	0.60	219.00	[REDACTED]
1220.002	09/25/2019	JLC	0.20	73.00	[REDACTED]
1220.002	09/25/2019	JLC	0.20	73.00	emails with MBM and F. Pometti re: [REDACTED]
1220.002	09/25/2019	JLC	0.10	36.50	email from A. Mielke re: [REDACTED]
1220.002	09/25/2019	MBM	1.70	1,105.00	review and revise [REDACTED] (1.6); emails with Pometti re: same (.1)
1220.002	09/26/2019	JLC	1.80	657.00	[REDACTED]
1220.002	09/26/2019	JLC	0.80	292.00	prepare for and attend call with MBM, Alix team re: Columbia Gas issues
1220.002	09/26/2019	JLC	3.60	1,314.00	[REDACTED] (3.3) and emails/conferences with MBM re: same (.3)
1220.002	09/26/2019	JLC	0.20	73.00	emails with A. Mielke, MBM re: [REDACTED]
1220.002	09/26/2019	JLC	0.10	36.50	email with ACD re: [REDACTED]
1220.002	09/26/2019	MBM	1.50	975.00	[REDACTED] (.9); call with Pometti re: same (.6)
1220.002	09/26/2019	ACD	0.10	25.00	email with JLC re: hearing date for motion to compel
1220.002	09/27/2019	JLC	0.80	292.00	prepare for and attend call with company and MBM
1220.002	09/27/2019	JLC	0.10	36.50	[REDACTED]

Date: 11/08/2019

Detail Fee Task Code Billing Report
Landis Rath & Cobb LLP

Page: 2

Client	Trans Date	Tmkr	Hours to Bill	Amount	
Phase ID B124 Claims Administration & Objections					
1220.002	09/27/2019	JLC	0.30	109.50	(.1); confer with MBM re: same (.1); email to F. Pometti re: (1.1);
1220.002	09/27/2019	JLC	0.30	109.50	emails with F. Pometti and MBM (.1); (2)
1220.002	09/27/2019	JLC	0.50	182.50	
1220.002	09/27/2019	JLC	1.30	474.50	(1.1); confer and emails with MBM re: same (.2
1220.002	09/27/2019	MBM	1.30	845.00	(1.1); conferences with Cree re: same (.2)
1220.002	09/27/2019	MBM	2.10	1,365.00	review of Columbia Gas documents (1.3); call with Pometti and Hawkins re: same (.8)
1220.002	09/28/2019	JLC	0.20	73.00	(.1); email to YCST re: (1)
1220.002	09/28/2019	JLC	0.10	36.50	email from A. Mielke re: (1)

Total for Phase ID B124

Billable	62.50	28,729.00	Claims Administration & Objections
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Phase ID B134 Hearings

1220.002	08/20/2019	JLC	0.10	36.50	review agenda re: 8/22 hearing
1220.002	09/26/2019	ACD	0.30	75.00	Review emails from J. Cree regarding hearing dates (0.1); review docket re: same and update calendar with new dates (0.2)

Total for Phase ID B134

Billable	0.40	111.50	Hearings
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Phase ID B136 LRC Retention & Fee Matters

1220.002	07/29/2019	JLC	0.20	73.00	confer with ACD re: interim fee app (.1) and review and revise bill for monthly fee app (.1)
1220.002	07/31/2019	JLC	0.10	36.50	confer with MBM re: case status and interim fees
1220.002	08/01/2019	ACD	0.80	200.00	Begin drafting LRC's 6th monthly and third interim fee app
1220.002	08/08/2019	JLC	0.10	36.50	confer with MBM re: interim fee app
1220.002	08/12/2019	JLC	0.20	73.00	confer with MBM re: interim fee app (.1); email to ACD re: draft of same (.1)
1220.002	08/13/2019	JLC	0.40	146.00	review and revise 6th monthly fee app for compliance with UST guidelines and local rules.
1220.002	08/14/2019	JLC	0.10	36.50	confer with ACD (.1), MBM (.1) re: LRC interim fee app.
1220.002	08/15/2019	JLC	0.20	73.00	finalize LRC interim fee app.
1220.002	09/04/2019	JLC	0.20	73.00	review Certification of Counsel re: interim fee application (.1); emails with A. Mielke re: same (.1)

Total for Phase ID B136

Billable	2.30	747.50	LRC Retention & Fee Matters
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GRAND TOTALS

Billable	65.20	29,588.00
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EXHIBIT C

MONTHLY EXPENSE SUMMARY

Expenses Category	Total Expenses
Copying	\$34.00
Online Research	\$11.55
Document Retrieval	\$5.86
Confrence Call Service	\$23.68
TOTAL	\$75.09

Date: 11/08/2019

Detail Cost Task Code Billing Report
Landis Rath & Cobb LLP

Page: 1

<u>Client</u>	<u>Trans Date</u>	<u>Rate</u>	<u>Units</u>	<u>Amount</u>	
Activity ID E101 Inhouse Copying					
1220.002	08/16/2019	0.100	78.00	7.80	Inhouse Copying 8/10/2019-8/23/2019
1220.002	08/31/2019	0.100	262.00	26.20	Inhouse Copying
Total for Activity ID E101			Billable	34.00	Inhouse Copying
Activity ID E106 Online research					
1220.002	09/30/2019			11.55	Online research Relx Inc. DBA LexisNexis - Invoice 3092241181
Total for Activity ID E106			Billable	11.55	Online research
Activity ID E208 Document Retrieval					
1220.002	09/30/2019			5.86	Document Retrieval CourtLink - Invoice 3092241181
Total for Activity ID E208			Billable	5.86	Document Retrieval
Activity ID E226 Conference Call Service					
1220.002	09/26/2019			10.37	Conference Call Service American Teleconferencing Services Ltd. - Invoice 101219
1220.002	09/27/2019			13.31	Conference Call Service American Teleconferencing Services Ltd. - Invoice 101219
Total for Activity ID E226			Billable	23.68	Conference Call Service
GRAND TOTALS					
			Billable	75.09	

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

In re:

WELDED CONSTRUCTION, L.P., *et al.*¹

Debtors.

Chapter 11

Case No. 18-12378 (KG)

(Jointly Administered)

CERTIFICATION OF MATTHEW B. MCGUIRE

Matthew B. McGuire, an attorney-at-law, duly admitted in good standing to practice in the State of Delaware hereby certifies that:

1. I am a partner in the firm of Landis Rath & Cobb LLP (“LRC”), and I am duly authorized to make this certification on behalf of LRC. LRC was retained by the Debtors² as Special Counsel pursuant to an order of the Court. This certification is made in support of the *Combined Seventh 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 July 1, 2019 Through and Including September 30, 2019* (the “Application”) and in compliance with rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (“Rule 2016-2”) and with the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330* (the “U.S. Trustee Guidelines”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Welded Construction, L.P. (5008) and Welded Construction Michigan, LLC (9830). The mailing address for each of the Debtors is 26933 Eckel Road, Perrysburg, OH 43551.

² Capitalized terms utilized but not otherwise defined herein shall have the meaning ascribed to them in the Application.

2. I have read the Application, and I certify that the Application substantially complies with Rule 2016-2 and the U.S. Trustee Guidelines.

Dated: November 8, 2019
Wilmington, Delaware

LANDIS RATH & COBB LLP



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Special Counsel to the Debtors and Debtors-In-Possession