

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

NOTICE OF TENTH 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 AUGUST 1, 2019 THROUGH AUGUST 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 November 12, 2019, the *Tenth 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 August 1, 2019 through August 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 \$48,723.60 (80% of \$60,904.50) for professional services rendered and (ii) reimbursement of expenses incurred in the amount of \$384.19 as counsel to the Committee during the period from August 1, 2019 through and including August 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 **December 2, 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 to 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 \$48,723.60 (80% of \$60,904.50) for services rendered to the Committee and reimbursement of \$384.19 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: November 12, 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: December 2, 2019 at 4:00 p.m. (ET)**

**SUMMARY COVER SHEET TO THE TENTH 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 AUGUST 1, 2019 THROUGH AUGUST 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:*

August 1, 2019 through August 31, 2019

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

\$48,723.60 (80% of \$60,904.50)

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

\$384.19

*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:*

\$1,394,771.75

*Total expenses approved by interim order to date:*

\$12,164.54

*Total compensation and expenses paid to date:*

\$1,454,446.65

<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:* \$587.08

*Blended rate in this application for all timekeepers:* \$542.82

*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:* 6

*Number of professionals in this application not included in staffing plan:* 1

*Number of professionals billing fewer than 15 hours to the case during this period:* 2

*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 26.60 hours and the corresponding compensation requested hereby is approximately \$10,311.50. 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
7/3/2019 D.I. 819	5/1/2019 – 5/31/2019 (Seventh Monthly)	\$58,220.00	\$283.00	\$46,576.00 (80%) D.I. 907	\$283.00 (100%) D.I. 907
8/9/2019 D.I. 935	6/1/2019 – 6/30/2019 (Eighth Monthly)	\$150,175.25	\$3,629.48	\$120,140.20 (80%) D.I. 970	\$3,629.48 (100%) D.I. 970
8/30/2019 D.I. 971	7/1/2019 – 7/31/2019 (Ninth Monthly)	\$58,220.00	\$934.36	\$46,576.00 (80%) D.I. 1024	\$934.36 (100%) D.I. 1024

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

**TENTH 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 AUGUST 1, 2019 THROUGH AUGUST 31, 2019**

This tenth 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 August 1, 2019 through and including August 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. On August 14, 2019, Blank Rome filed the *Third 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 April 1, 2019 Through June 30, 2019* [Docket No. 948] (the “**Third Interim Fee Application**”). On September 10, 2019, the Court entered an order [Docket No. 989] approving the Third Interim Fee Application.

11. 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 \$1,454,446.65 by the Debtors in connection with Blank Rome’s previous monthly and interim fee applications.



12. 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.

13. 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, and Jose F. Bibiloni. 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**

14. 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.

---

<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.

- (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**

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

**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:** 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 and July 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**

16. 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 \$60,904.50 and payment by the Debtors of 80% of this amount (\$48,723.60), and (b) the allowance and payment of 100% of its actual and necessary expenses incurred during the Application Period in the amount of \$384.19, all in accordance with the terms of the Administrative Order.

### **Summary of Fees**

17. The total number of hours expended by Blank Rome professionals and paraprofessionals in performing professional services for the Committee during the Application Period was **112.20** hours at a blended billing rate of **\$542.82** per hour. The value of these services has been computed at the rates Blank Rome customarily charges for similar services provided to other clients.

18. 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.

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

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

**Total Hours: 2.00 Total Fees: \$1,374.00**

This category includes Blank Rome's review and analysis of the Debtors' equipment and real estate sale processes including the review and assessment of the Debtors-Gordon Bros./Ritchie Bros. reconciliation agreement, as well as analysis in connection with the Debtors' selection of a real estate broker.

**(Task Code 003) Avoidance Action Analysis**

**Total Hours: 10.50 Total Fees: \$5,097.00**

This category includes Blank Rome's review and analysis of the Debtors' potential avoidance actions and research conducted in relation to same.

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

**Total Hours: 6.30 Total Fees: \$3,068.00**

This category includes Blank Rome's work in connection with a variety of case procedural matters, hearing calendaring, weekly professionals' calls, and other general matters pertaining to the chapter 11 cases.

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

**Total Hours: 2.20**

**Total Fees: \$1,254.00**

This category includes Blank Rome's work in reviewing and analyzing the general claims pool, the Debtors' omnibus claims objections, settlements with various parties in interest, and communications with Teneo regarding same.

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

**Total Hours: 15.90**

**Total Fees: \$8,702.50**

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: 4.90**

**Total Fees: \$2,961.00**

This category includes Blank Rome's work analyzing the Central States claim filed in the cases and research conducted in connection with same.

**(Task Code 012) Executory Contracts/Leases**

**Total Hours: 1.40**

**Total Fees: \$879.50**

This category includes Blank Rome's work in connection with the Debtors' various customer completion agreements, assessment of issues relating thereto, and implementation of those agreements.

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

**Total Hours: 26.60 Total Fees: \$10,311.50**

This category includes Blank Rome's work preparing and filing its eighth (June 2019) and ninth (July 2019) monthly fee applications, as well as its third interim fee application and related papers.

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

**Total Hours: 4.20 Total Fees: \$1,543.00**

This category includes Blank Rome's work preparing and filing Teneo's ninth monthly fee application (July 2019) and third interim fee application in these cases.

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

**Total Hours: 19.00 Total Fees: \$13,130.00**

This category includes Blank Rome's work investigating the prepetition conduct of the Debtors and their affiliates and insiders, preparation of related discovery, as well as research conducted in connection with same.

**(Task Code 019) Litigation**

**Total Hours: 16.90 Total Fees: \$11,087.00**

This category includes Blank Rome's work reviewing and analyzing litigation issues related to the Williams, Prime NDT, and Earth Pipeline adversary proceedings.

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

**Total Hours: 2.30 Total Fees: \$1,497.00**

This category includes Blank Rome's work preparing for and attending the August 22 hearing and communications with the Debtors regarding same.

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**

20. Reimbursement of expenses in the amount of \$384.19 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**

21. 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).

22. 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**

23. 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.

24. 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.

25. 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 \$48,723.60 (80% of \$60,904.50), together with the reimbursement of expenses incurred in the amount of \$384.19, and such other and further relief that the Court deems just, proper and necessary.

*[Signature follows]*

Dated: November 12, 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  
(AUGUST 1, 2019 THROUGH AUGUST 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	\$759.97
Counsel	\$651.00	\$570.00
Associate	\$463.00	\$420.00
Paralegal	\$294.00	\$335.00
<b>Aggregated:</b>	<b>\$637.00 (average)</b>	<b>\$542.82 (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  
(AUGUST 1, 2019 THROUGH AUGUST 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		
Michael B. Schaedle	Partner	Finance, Restructuring and Bankruptcy	Member of PA and NJ Bars since 1992; Member of NY Bar since 2012	21.40	\$17,334.00	\$810.00	\$780.00	1	\$16,692.00
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	9.80	\$7,007.00	\$715.00	\$690.00	1	\$6,762.00
Frederick G. Sandstrom	Partner	Labor & Employment	Member of IL Bar since 2002; Member of DC Bar since 2005; Member of PA Bar since 2012	4.20	\$2,562.00	\$610.00	N/A	N/A	\$2,562.00
Josef W. Mintz	Of Counsel	Finance, Restructuring and Bankruptcy	Member of PA and NJ Bars since 2008; Member of DE Bar since 2011	22.80	\$12,996.00	\$570.00	\$535.00	1	\$12,198.00
Jose F. Bibiloni	Associate	Finance, Restructuring and Bankruptcy	Member of DE Bar since 2016; Member of PA Bar since 2017	34.30	\$14,406.00	\$420.00	\$355.00	2	\$12,176.50

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
Christopher A. Lewis	Paralegal	Finance, Restructuring and Bankruptcy	N/A	19.70	\$6,599.50	\$335.00	\$330.00	1	\$6,501.00
<b>TOTALS:</b>				<b>112.20</b>	<b>\$60,904.50</b>				<b>\$56,891.50</b>

**EXHIBIT C**

**STAFFING PLAN FOR BLANK ROME LLP  
FOR THE PERIOD AUGUST 1, 2019 THROUGH AUGUST 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	\$420.00
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 95.8% 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  
(AUGUST 1, 2019 THROUGH AUGUST 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	2.00	\$1,374.00
<b>003</b>	Avoidance Action Analysis	10.50	\$5,097.00
<b>006</b>	Case Administration (General)	6.30	\$3,068.00
<b>007</b>	Claims Administration and Objections	2.20	\$1,254.00
<b>008</b>	Creditors Committee	15.90	\$8,702.50
<b>009</b>	Employee Benefits and Pension	4.90	\$2,961.00
<b>012</b>	Executory Contracts/Leases	1.40	\$879.50
<b>013</b>	Fee Applications - Internal	26.60	\$10,311.50
<b>014</b>	Fee Applications – Others	4.20	\$1,543.00
<b>017</b>	Investigation of Company	19.00	\$13,130.00
<b>019</b>	Litigation	16.90	\$11,087.00
<b>021</b>	Omnibus Court Hearing	2.30	\$1,497.00
<b>TOTALS:</b>		<b>112.20</b>	<b>\$60,904.50</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: NOVEMBER 11, 2019  
 MATTER NO. 154278-01600 04015  
 INVOICE NO. 1855743

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

---

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

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
<b>TASK: 001 ASSET SALES/DISPOSITION</b>					
08/01/19	NUMEROUS EMAILS WITH M. SCHAEDELE AND TENEO TEAM RE DEBTORS' RECONCILIATION AGREEMENT WITH GB/RB.	BIBILONI, JOSE	001	0.20	84.00
08/01/19	NOTES TO AND FROM O. STEVENS AND M. LUNN REGARDING RECONCILIATION AGREEMENT	SCHAEDELE, MICHAEL	001	0.60	486.00
08/15/19	CALL WITH A. MIELKE REGARDING REAL ESTATE BROKER (.2); EMAIL TO TENEO REGARDING SAME (.2)	MINTZ, JOSEF	001	0.40	228.00
08/16/19	REVIEW REAL ESTATE BROKER SELECTION WITH TENEO	MINTZ, JOSEF	001	0.30	171.00
08/16/19	REVIEW ALIX RECOMMENDATION ON BROKER FOR REAL PROPERTY AND RESPOND	SCHAEDELE, MICHAEL	001	0.30	243.00
08/27/19	REVIEW INFORMATION ON SALE OF HQ	SCHAEDELE, MICHAEL	001	0.20	162.00
	<b>001 ASSET SALES/DISPOSITION</b>			<b>2.00</b>	<b>1,374.00</b>
<b>TASK: 003 AVOIDANCE ACTION ANALYSIS</b>					
08/13/19	CALL WITH J. MINTZ RE RESEARCH RELATED TO PREFERENCE CLAIMS (.2); RESEARCH SAME AND EMAIL J. MINTZ CASE LAW IN CONNECTION WITH SAME (.6).	BIBILONI, JOSE	003	0.80	336.00



WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 2

INVOICE NO. 1855743

NOVEMBER 11, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
08/13/19	REVIEW ISSUE OF PREFERENCE DEFENSE FROM MECHANICS LIEN; CALL WITH J. BIBILONI REGARDING SAME (.3); REVIEW PRELIMINARY RESEARCH FINDINGS AND FOLLOW UP (.3); EMAILS WITH M. SCHAEDEL REGARDING SAME (.2)	MINTZ, JOSEF	003	0.80	456.00
08/14/19	ADDITIONAL REVIEW AND MARK UP OF ACTION PLAN ON AVOIDANCE ACTIONS AND BECHTEL (.8); REVIEW RELATED MATERIAL (.5)	SCHAEDEL, MICHAEL	003	1.30	1,053.00
08/22/19	RESEARCH PREFERENCE ACTION ISSUES AND DEFENSES TO SAME PER J. MINTZ REQUEST.	BIBILONI, JOSE	003	2.10	882.00
08/23/19	RESEARCH PREFERENCE ISSUES PER J. MINTZ REQUEST.	BIBILONI, JOSE	003	0.60	252.00
08/26/19	FURTHER RESEARCH PREFERENCE MATTERS AND DEFENSES THERETO PER J. MINTZ REQUEST.	BIBILONI, JOSE	003	1.10	462.00
08/27/19	FURTHER RESEARCH PREFERENCE ISSUES AND DEFENSES TO PREFERENCE CLAIMS PER J. MINTZ REQUEST.	BIBILONI, JOSE	003	2.60	1,092.00
08/27/19	DISCUSSION WITH J. BIBILONI REGARDING RESEARCH ON MECHANICS LIEN DEFENSES TO POTENTIAL AVOIDANCE LITIGATION	MINTZ, JOSEF	003	0.40	228.00
08/28/19	RESEARCH PREFERENCE RELATED ISSUES AND DEFENSES TO SUCH CLAIMS PER J. MINTZ REQUEST.	BIBILONI, JOSE	003	0.80	336.00
	<b>003 AVOIDANCE ACTION ANALYSIS</b>			<b>10.50</b>	<b>5,097.00</b>
<b>TASK: 006 CASE ADMINISTRATION (GENERAL)</b>					
08/02/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.80	268.00
08/05/19	DISCUSS PROFESSIONALS' STATUS CALL WITH J. MINTZ	SCHAEDEL, MICHAEL	006	0.10	81.00
08/08/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.80	268.00
08/12/19	NOTE TO AND FROM J. MINTZ AND J. LUCIAN ON PROFESSIONAL CALL AND RELATED AGENDA	SCHAEDEL, MICHAEL	006	0.10	81.00
08/14/19	REVIEW AND DOCKET AND UPDATE 2002 SERVICE LIST	LEWIS, CHRISTOPHER	006	0.40	134.00
08/14/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.70	234.50

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 3

INVOICE NO. 1855743

NOVEMBER 11, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
08/20/19	EMAILS AND CALL WITH A. MIELKE RE WEEKLY PROFESSIONALS' CALL (.1); EMAILS WITH INTERNAL BR TEAM RE SAME (.1).	BIBILONI, JOSE	006	0.20	84.00
08/20/19	NOTE TO AND FROM A. MIELKE REGARDING PROFESSIONALS' STATUS CALL	SCHAEDLE, MICHAEL	006	0.10	81.00
08/22/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.70	234.50
08/27/19	REVIEW AGENDA FOR PROFESSIONALS CALL	SCHAEDLE, MICHAEL	006	0.20	162.00
08/28/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.60	201.00
08/28/19	CALL WITH DEBTOR'S PROFESSIONALS TO REVIEW CASE STATUS	LUCIAN, JOHN	006	0.60	429.00
08/28/19	PARTICIPATE IN PROFESSIONALS' STATUS CALL WITH YCST/ALIX TEAM AND J. LUCIAN, J. MINTZ AND J. BIBILONI	SCHAEDLE, MICHAEL	006	1.00	810.00
<b>006 CASE ADMINISTRATION (GENERAL)</b>				<b>6.30</b>	<b>3,068.00</b>
<b>TASK: 007 CLAIMS ADMINISTRATION AND OBJECTIONS</b>					
08/01/19	EMAILS WITH R. POPITTI REGARDING OSHA SETTLEMENT	MINTZ, JOSEF	007	0.20	114.00
08/02/19	EMAIL TO R. POPPITI REGARDING OSHA SETTLEMENT	MINTZ, JOSEF	007	0.30	171.00
08/14/19	REVIEW 4TH, 5TH AND 6TH OMNIBUS OBJECTIONS TO CLAIMS (.3); REVIEW 2ND AND 3RD NOTICES OF SATISFACTION (.3)	MINTZ, JOSEF	007	0.60	342.00
08/28/19	EMAIL TO O. STEVENS REGARDING OHIO CAT SETTLEMENT AGREEMENT	MINTZ, JOSEF	007	0.20	114.00
08/28/19	REVIEW OHIOCAT SETTLEMENT AGREEMENT (.5); REVIEW CERTIFICATION OF COUNSEL AND PROPOSED ORDER (.2); EMAIL TO J. LUCIAN AND M. SCHAEDELE REGARDING SAME (.2)	MINTZ, JOSEF	007	0.90	513.00
<b>007 CLAIMS ADMINISTRATION AND OBJECTIONS</b>				<b>2.20</b>	<b>1,254.00</b>
<b>TASK: 008 CREDITORS COMMITTEE (INTERNAL/COMMUNICATION W/CREDITC</b>					
08/01/19	EMAILS WITH J. MINTZ AND TENEO TEAM RE COMMITTEE UPDATE REPORT.	BIBILONI, JOSE	008	0.10	42.00
08/01/19	ATTENTION TO COMMITTEE ISSUES	LUCIAN, JOHN	008	0.50	357.50

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 4

INVOICE NO. 1855743

NOVEMBER 11, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
08/01/19	REVISE AND SEND COMMITTEE UPDATE IN LIEU OF CONFERENCE CALL	MINTZ, JOSEF	008	0.50	285.00
08/05/19	CALL AND EMAIL WITH A. MIELKE REGARDING PROFESSIONALS CALL (.3); EMAILS WITH CASE TEAM AND TENEO REGARDING SAME (.2)	MINTZ, JOSEF	008	0.50	285.00
08/06/19	CALL WITH A. MIELKE REGARDING OPEN ITEMS	MINTZ, JOSEF	008	1.00	570.00
08/07/19	DISCUSS COMMITTEE REPORT WITH J. MINTZ AND ATTENTION TO COORDINATING SAME.	BIBILONI, JOSE	008	0.30	126.00
08/07/19	REPORT TO M. SCHAEDELE AND J. LUCIAN REGARDING COMMITTEE UPDATE AND OPEN POINTS (.7); PREPARE AND SEND DETAILED UPDATE TO COMMITTEE ON OPEN MATTERS (.7)	MINTZ, JOSEF	008	1.40	798.00
08/12/19	EMAILS WITH A. MIELKE REGARDING DEBTOR/COMMITTEE UPDATE CALL (.1); EMAILS WITH M. SCHAEDELE REGARDING SAME (.2)	MINTZ, JOSEF	008	0.30	171.00
08/14/19	PREPARE FOR COMMITTEE UPDATE CALL SCHEDULED FOR AUGUST 15.	BIBILONI, JOSE	008	0.20	84.00
08/14/19	DISCUSS COORDINATION OF COMMITTEE UPDATE CALL WITH J. LUCIAN AND J. MINTZ (.1); COORDINATE SAME WITH COMMITTEE MEMBERS (.2); PREPARE AGENDA FOR CALL AND EMAILS WITH J. MINTZ RE SAME (.6); CIRCULATE AGENDA TO COMMITTEE (.1).	BIBILONI, JOSE	008	1.00	420.00
08/14/19	ATTENTION TO COMMITTEE MEETING (.2); GUIDANCE TO BIBILONI RE: SAME (.2)	LUCIAN, JOHN	008	0.40	286.00
08/14/19	CALL TO J. STIFF REGARDING TOMORROW'S COMMITTEE TELECONFERENCE	MINTZ, JOSEF	008	0.20	114.00
08/14/19	REVIEW TENEO UPDATE SLIDES (.2); EMAIL TO A. STEPANYANTS REGARDING SAME (.1); EMAILS WITH J. BIBILONI REGARDING UPDATE CALL AND AGENDA (.3)	MINTZ, JOSEF	008	0.60	342.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 5

INVOICE NO. 1855743

NOVEMBER 11, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
08/14/19	CALL WITH A. MIELKE REGARDING STATUS OF VARIOUS CONTESTED MATTERS AND ISSUES IN CASE (.5); FOLLOW UP EMAIL REGARDING SAME (.2)	MINTZ, JOSEF	008	0.70	399.00
08/14/19	REVIEW AGENDA FOR COMMITTEE MEETING AND NOTE TO AND FROM WORKING GROUP REGARDING SAME	SCHAEDLE, MICHAEL	008	0.20	162.00
08/15/19	PREPARE FOR AND PARTICIPATE IN COMMITTEE UPDATE CALL WITH J. MINTZ.	BIBILONI, JOSE	008	1.20	504.00
08/15/19	PREPARE FOR (.4) AND LEAD COMMITTEE UPDATE CALL (.4); EMAIL WITH R. HOPP (COMMITTEE MEMBER) REGARDING FOLLOW UP QUESTION (.3)	MINTZ, JOSEF	008	1.10	627.00
08/15/19	REPORT FROM J. MINTZ ON COMMITTEE MEETING	SCHAEDLE, MICHAEL	008	0.10	81.00
08/21/19	DISCUSSIONS WITH J. LUCIAN RE COMMITTEE REPORT (.2); PREPARE EMAIL TO THE COMMITTEE RE OMNIBUS HEARING ATTENDANCE AND REVIEW WITH J. LUCIAN (.2); SEND UPDATE TO COMMITTEE MEMBERS (.1).	BIBILONI, JOSE	008	0.50	210.00
08/21/19	ATTENTION TO COMMITTEE MATTERS	LUCIAN, JOHN	008	0.30	214.50
08/26/19	ATTENTION TO COMMITTEE MATTERS	LUCIAN, JOHN	008	0.20	143.00
08/27/19	EMAILS WITH YOUNG CONAWAY AND TENEO TEAMS REGARDING COMMITTEE UPDATE	MINTZ, JOSEF	008	0.30	171.00
08/28/19	COORDINATE WEEKLY COMMITTEE CALL WITH COMMITTEE MEMBERS (.2); CONFER WITH J. LUCIAN RE AGENDA FOR CALL, PREPARE SAME, AND REVIEW WITH J. LUCIAN (.9); CIRCULATE SAME TO COMMITTEE MEMBERS (.1).	BIBILONI, JOSE	008	1.20	504.00
08/28/19	STRATEGY RE: COMMITTEE MATTERS AND PREPARE AGENDA	LUCIAN, JOHN	008	0.50	357.50
08/28/19	PARTICIPATE IN PROFESSIONALS UPDATE CALL WITH YOUNG CONAWAY AND TENEO TEAMS	MINTZ, JOSEF	008	1.00	570.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 6

INVOICE NO. 1855743

NOVEMBER 11, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
08/29/19	PREPARE FOR AND PARTICIPATE IN COMMITTEE MEMBER UPDATE CALL.	BIBILONI, JOSE	008	0.70	294.00
08/29/19	PREPARE FOR (.3) AND PARTICIPATE IN COMMITTEE TELECONFERENCE (.3)	MINTZ, JOSEF	008	0.60	342.00
08/29/19	PARTICIPATE IN COMMITTEE MEETING	SCHAEDELE, MICHAEL	008	0.30	243.00
<b>008 CREDITORS COMMITTEE (INTERNAL/COMMUNICATION W/CREI</b>				<b>15.90</b>	<b>8,702.50</b>
<b>TASK: 009 EMPLOYEE BENEFITS AND PENSION</b>					
08/06/19	DOWNLOAD THIRD CIRCUIT OPINION ON MEPPA LIABILITY (.1) AND EMAIL TO G. SANDSTROM REGARDING SAME (.2)	MINTZ, JOSEF	009	0.30	171.00
08/06/19	ANALYZE COURT OPINION RELEVANT TO WITHDRAWAL LIABILITY ISSUE AND CORRESPOND WITH J. MINTZ REGARDING SAME	SANDSTROM, FREDERICK	009	0.30	183.00
08/14/19	REVIEW COURT OPINION RELEVANT TO WITHDRAWAL LIABILITY ISSUE (.3); EMAIL TO G. SANDSTROM REGARDING SAME (.1)	MINTZ, JOSEF	009	0.40	228.00
08/14/19	FURTHER REVIEW AND ANALYSIS OF RECENT THIRD CIRCUIT DECISION ON WITHDRAWAL LIABILITY	SANDSTROM, FREDERICK	009	0.30	183.00
08/14/19	ANALYZE RECENT 3RD CIRCUIT DECISION REGARDING WITHDRAWAL LIABILITY	SANDSTROM, FREDERICK	009	0.40	244.00
08/14/19	RESEARCH TO IDENTIFY OTHER RECENT COURT DECISIONS ADDRESSING SIMILAR ISSUES OF WITHDRAWAL LIABILITY	SANDSTROM, FREDERICK	009	0.80	488.00
08/15/19	ANALYZE TIMING OF POTENTIAL WITHDRAWAL LIABILITY ARBITRATION PER J. MINTZ REQUEST	SANDSTROM, FREDERICK	009	0.30	183.00
08/15/19	FURTHER RESEARCH TO IDENTIFY OTHER RECENT COURT DECISIONS ADDRESSING SIMILAR ISSUES OF WITHDRAWAL LIABILITY	SANDSTROM, FREDERICK	009	0.70	427.00
08/15/19	FURTHER ANALYZE 3RD CIRCUIT DECISION ON WITHDRAWAL LIABILITY AND CORRESPOND WITH J. MINTZ REGARDING SAME	SANDSTROM, FREDERICK	009	0.70	427.00
08/16/19	FURTHER ANALYSIS OF ARBITRATION PROCEDURE FOR WITHDRAWAL LIABILITY CLAIMS	SANDSTROM, FREDERICK	009	0.70	427.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 7

INVOICE NO. 1855743

NOVEMBER 11, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
<b>009 EMPLOYEE BENEFITS AND PENSION</b>				<b>4.90</b>	<b>2,961.00</b>
<b>TASK: 012 EXECUTORY CONTRACTS/LEASES</b>					
08/02/19	EMAILS WITH B. FELDMAN (YCST) AND J. LUCIAN RE SUNOCO RELEASE OF FUNDS AGREEMENT AND PROCEDURE IN CONNECTION WITH SAME.	BIBILONI, JOSE	012	0.10	42.00
08/02/19	REVIEW SUNOCO CLAIMS SUPPLEMENTAL SETTLEMENT (.3); EMAILS RE: SAME (.2)	LUCIAN, JOHN	012	0.50	357.50
08/02/19	REVIEW AGREEMENT ON SUNOCO WINDDOWN AND NOTE TO AND FROM J. LUCIAN	SCHAEDELE, MICHAEL	012	0.10	81.00
08/14/19	REVIEW ETP CLOSEOUT ORDER AND UNDERLYING STIPULATION	MINTZ, JOSEF	012	0.70	399.00
<b>012 EXECUTORY CONTRACTS/LEASES</b>				<b>1.40</b>	<b>879.50</b>
<b>TASK: 013 FEE APPLICATIONS - INTERNAL</b>					
08/01/19	WORK ON BLANK ROME MONTHLY FEE APPLICATION (JUNE 2019).	BIBILONI, JOSE	013	0.20	84.00
08/02/19	PREPARE BLANK ROME'S EIGHTH MONTHLY FEE APPLICATION (JUNE 2019) AND EMAILS WITH C. LEWIS AND N. LONG RE DIRECTION IN CONNECTION WITH SAME.	BIBILONI, JOSE	013	1.80	756.00
08/05/19	WORK ON BLANK ROME EIGHTH MONTHLY FEE APPLICATION (JUNE 2019) (1.5); EMAILS WITH C. LEWIS AND N. LONG RE SAME (.2).	BIBILONI, JOSE	013	1.70	714.00
08/05/19	ATTENTION TO MONTHLY FEE APPLICATION	LUCIAN, JOHN	013	0.30	214.50
08/06/19	PREPARE BLANK ROME'S EIGHTH MONTHLY (JUNE 2019) FEE APPLICATION	LEWIS, CHRISTOPHER	013	2.40	804.00
08/07/19	FURTHER WORK ON BLANK ROME EIGHTH MONTHLY FEE APPLICATION (JUNE 2019).	BIBILONI, JOSE	013	0.70	294.00
08/07/19	PREPARE BLANK ROME'S EIGHTH MONTHLY (JUNE 2019) FEE APPLICATION	LEWIS, CHRISTOPHER	013	1.20	402.00
08/08/19	EMAILS WITH C. LEWIS RE FINALIZING BLANK ROME EIGHTH MONTHLY FEE APPLICATION (JUNE 2019) AND ATTENTION TO SAME.	BIBILONI, JOSE	013	0.20	84.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 8

INVOICE NO. 1855743

NOVEMBER 11, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
08/09/19	ATTENTION TO BLANK ROME NINTH MONTHLY FEE APPLICATION (JULY 2019).	BIBILONI, JOSE	013	0.10	42.00
08/09/19	WORK ON FINALIZING AND FILING BLANK ROME EIGHT MONTHLY FEE APPLICATION (JUNE 2019) (.3); COORDINATION WITH C. LEWIS RE SAME (.2).	BIBILONI, JOSE	013	0.50	210.00
08/09/19	PREPARE, E-FILE AND SERVE BLANK ROME'S EIGHTH MONTHLY (JUNE 2019) FEE APPLICATION	LEWIS, CHRISTOPHER	013	0.50	167.50
08/09/19	ATTENTION TO MONTHLY FEE APP	LUCIAN, JOHN	013	0.30	214.50
08/13/19	ATTENTION TO BLANK ROME'S THIRD INTERIM FEE APPLICATION (.2); EMAILS WITH C. LEWIS RE SAME (.1).	BIBILONI, JOSE	013	0.30	126.00
08/13/19	DRAFT BLANK ROME'S THIRD INTERIM/QUARTERLY FEE APPLICATION FOR THE PERIOD FROM APRIL 1, 2019 THROUGH JUNE 30, 2019	LEWIS, CHRISTOPHER	013	3.80	1,273.00
08/14/19	ATTENTION TO REVIEWING AND FINALIZING BLANK ROME THIRD INTERIM FEE APPLICATION FOR FILING (.5); EMAILS WITH C. LEWIS RE SAME (.1).	BIBILONI, JOSE	013	0.60	252.00
08/14/19	PREPARE, E-FILE AND SERVE BLANK ROME'S THIRD INTERIM FEE APPLICATION (APRIL-JUNE 2019)	LEWIS, CHRISTOPHER	013	0.60	201.00
08/15/19	EMAILS AND CALL TO C. LEWIS RE BLANK ROME AND TENEO INTERIM FEE APPLICATIONS AND FILING/SERVICE OF SAME.	BIBILONI, JOSE	013	0.10	42.00
08/21/19	WORK ON BLANK ROME 9TH MONTHLY FEE APPLICATION (JULY 2019).	BIBILONI, JOSE	013	0.10	42.00
08/22/19	WORK ON BLANK ROME 9TH MONTHLY FEE APPLICATION (JULY 2019).	BIBILONI, JOSE	013	2.00	840.00
08/22/19	PREPARE BLANK ROME'S NINTH MONTHLY (JULY 2019) FEE APPLICATION	LEWIS, CHRISTOPHER	013	0.50	167.50
08/22/19	ATTENTION TO MONTHLY FEE APPPLICATION	LUCIAN, JOHN	013	0.20	143.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 9

INVOICE NO. 1855743

NOVEMBER 11, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
08/23/19	WORK ON BLANK ROME NINTH MONTHLY FEE APPLICATION (JULY 2019).	BIBILONI, JOSE	013	1.10	462.00
08/26/19	FURTHER ATTENTION TO BLANK ROME NINTH MONTHLY FEE APPLICATION (JULY 2019).	BIBILONI, JOSE	013	1.70	714.00
08/28/19	EMAILS AND CALLS WITH D. GIAQUINTO AND C. LEWIS RE BLANK ROME NINTH MONTHLY FEE APPLICATION (JULY 2019) AND VARIOUS REVISIONS TO SAME IN PREPARATION FOR FILING.	BIBILONI, JOSE	013	0.40	168.00
08/29/19	PREPARE BLANK ROME'S JULY 2019 MONTHLY FEE APPLICATION	LEWIS, CHRISTOPHER	013	0.50	167.50
08/30/19	REVIEW CNO FOR BLANK ROME EIGHTH MONTHLY FEE APPLICATION (JUNE 2019) (.1); EMAILS WITH C. LEWIS RE FILING SAME (.1).	BIBILONI, JOSE	013	0.20	84.00
08/30/19	FINALIZE BLANK ROME NINTH MONTHLY FEE APPLICATION (JULY 2019) FOR FILING (1.0); EMAILS WITH C. LEWIS RE FILING AND SERVING SAME (.2).	BIBILONI, JOSE	013	1.20	504.00
08/30/19	REVIEW DOCKET AND DRAFT CERTIFICATE OF NO OBJECTION REGARDING EIGHTH MONTHLY (JUNE 2019) FEE APPLICATION (.2); PREPARE AND E-FILE SAME (.2)	LEWIS, CHRISTOPHER	013	0.40	134.00
08/30/19	PREPARE BLANK ROME'S NINTH MONTHLY (JULY 2019) FEE APPLICATION (2.6); E-FILE AND SERVE SAME (.4)	LEWIS, CHRISTOPHER	013	3.00	1,005.00
<b>013 FEE APPLICATIONS - INTERNAL</b>				<b>26.60</b>	<b>10,311.50</b>
<b>TASK: 014 FEE APPLICATIONS - OTHERS (INCLUDES REVIEW AND OBJECTIONS</b>					
08/05/19	EMAILS WITH A. STEPANYANTS RE TENEO THIRD INTERIM FEE APPLICATION AND EMAILS WITH C. LEWIS RE SAME.	BIBILONI, JOSE	014	0.30	126.00
08/13/19	EMAILS WITH A. STEPANYANTS RE TENEO 8TH MONTHLY FEE APPLICATION (JUNE 2019); REVIEW AND APPROVE CNO PREPARED BY C. LEWIS IN CONNECTION WITH SAME.	BIBILONI, JOSE	014	0.10	42.00



WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 10

INVOICE NO. 1855743

NOVEMBER 11, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
08/13/19	EMAILS WITH A. STEPANYANTS RE DRAFTS OF TENEO THIRD INTERIM FEE APPLICATION AND 9TH MONTHLY FEE APPLICATION (JULY 2019) AND INITIAL REVIEW OF SAME.	BIBILONI, JOSE	014	0.20	84.00
08/13/19	REVIEW DOCKET AND DRAFT CERTIFICATE OF NO OBJECTION REGARDING TENEO CAPITAL'S EIGHTH MONTHLY (JUNE 2019) FEE APPLICATION (.3); PREPARE AND E-FILE SAME (.2)	LEWIS, CHRISTOPHER	014	0.50	167.50
08/13/19	REVIEW AND REVISE TENEO CAPITAL'S THIRD INTERIM FEE APPLICATION (.8); DRAFT NOTICE OF SAME (.2)	LEWIS, CHRISTOPHER	014	1.00	335.00
08/14/19	ATTENTION TO FINALIZING AND FILING TENEO THIRD INTERIM FEE APPLICATION AND COMMUNICATIONS WITH C. LEWIS RE SAME.	BIBILONI, JOSE	014	0.40	168.00
08/14/19	PREPARE, E-FILE AND SERVE TENEO CAPITAL'S THIRD INTERIM FEE APPLICATION (APRIL-JUNE 2019)	LEWIS, CHRISTOPHER	014	0.60	201.00
08/19/19	ATTENTION TO TENEO NINTH MONTHLY FEE APPLICATION (JULY 2019).	BIBILONI, JOSE	014	0.30	126.00
08/21/19	ATTENTION TO FINALIZING, FILING, AND SERVING TENEO 9TH MONTHLY FEE APPLICATION (JULY 2019) AND EMAILS WITH C. LEWIS RE SAME.	BIBILONI, JOSE	014	0.30	126.00
08/21/19	PREPARE, E-FILE AND SERVE TENEO'S NINTH MONTHLY (JULY 2019) FEE APPLICATION	LEWIS, CHRISTOPHER	014	0.50	167.50
<b>014 FEE APPLICATIONS - OTHERS (INCLUDES REVIEW AND OBJECTI</b>				<b>4.20</b>	<b>1,543.00</b>
<b>TASK: 017 INVESTIGATION OF COMPANY</b>					
07/19/19	REVIEW ANALYSIS OF LEGAL ISSUES RELATIVE TO CERTAIN ACTIONS IN CONNECTION WITH COMMITTEE INVESTIGATION	SCHAEDLE, MICHAEL	017	2.00	1,620.00
08/01/19	REVIEW COMMITTEE INVESTIGATION MATERIALS AND M. KASLOW NOTE REGARDING SAME	SCHAEDLE, MICHAEL	017	0.30	243.00
08/01/19	REVIEW LEGAL PRECEDENT AND RELATED MATERIAL	SCHAEDLE, MICHAEL	017	0.80	648.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 11

INVOICE NO. 1855743

NOVEMBER 11, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
08/02/19	REVIEW CERTAIN BECHTEL INVESTIGATION MATTERS AND RELATED J. BIBILONI MEMO	SCHAEDLE, MICHAEL	017	0.50	405.00
08/03/19	EMAILS WITH M. NEIBURG REGARDING SEARCH TERMS AND INVESTIGATION (.2); REVIEW SEARCH HIT REPORT (.5)	MINTZ, JOSEF	017	0.70	399.00
08/05/19	EMAILS WITH J. MINTZ, M. SCHAEDELE, AND J. LUCIAN RE DISCOVERY SEARCH TERMS USED BY THE DEBTORS IN CONNECTION WITH COMMITTEE INVESTIGATION.	BIBILONI, JOSE	017	0.20	84.00
08/05/19	STRATEGY RE: BECHTEL E-DISCOVERY, EMAILS RE: SAME	LUCIAN, JOHN	017	0.90	643.50
08/05/19	REVIEW HIT REPORT FROM SEARCHES RUN BY DEBTORS (.5); EMAILS WITH J. LUCIAN REGARDING SAME AND RELATED STRATEGY (.5); EMAIL TO M. NEIBURG REGARDING QUESTIONS (.3)	MINTZ, JOSEF	017	1.30	741.00
08/05/19	NOTES TO AND FROM J. MINTZ AND J. LUCIAN ON BECHTEL INVESTIGATION MATTER	SCHAEDLE, MICHAEL	017	0.20	162.00
08/06/19	EMAIL TO M. NEIBURG REGARDING DATA REVIEW AND SEARCHES (.4); ANALYZE SEARCH RESULTS (.3)	MINTZ, JOSEF	017	0.70	399.00
08/07/19	EMAILS RE: BECHTEL E-DISCOVERY	LUCIAN, JOHN	017	0.40	286.00
08/07/19	EMAIL TO M. NEIBURG REGARDING SEARCH TERMS (.2); CALL WITH M. NEIBURG AND R. POPITTI REGARDING SAME (.4); REVIEW FOLLOW UP SEARCH RESULTS AND EMAIL TO M. NEIBURG REGARDING SAME (.5)	MINTZ, JOSEF	017	1.10	627.00
08/07/19	NOTE TO AND FROM J. MINTZ REGARDING EDISCOVERY ISSUES	SCHAEDLE, MICHAEL	017	0.10	81.00
08/08/19	ATTENTION TO BECHTEL E-DISCOVERY	LUCIAN, JOHN	017	0.40	286.00
08/08/19	REVIEW AND RESPOND TO M. NEIBURG EMAIL ON SEARCH TERMS (.2); STRATEGIZE WITH J. LUCIAN REGARDING SAME (.2)	MINTZ, JOSEF	017	0.40	228.00
08/08/19	REVIEW INFORMATION ON VOIDABLE TRANSACTIONS AND RELATED PRECEDENT	SCHAEDLE, MICHAEL	017	1.80	1,458.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 12

INVOICE NO. 1855743

NOVEMBER 11, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
08/09/19	ATTENTION TO BECHTEL E-DISCOVERY AND GUIDANCE TO MINTZ RE: SAME	LUCIAN, JOHN	017	0.40	286.00
08/09/19	EMAILS WITH M. NEIBURG REGARDING DOCUMENT REVIEW AND PRODUCTION STATUS (.1); REVIEW SEARCH HIT REPORT (.2); EMAILS WITH J. LUCIAN REGARDING SAME (.2)	MINTZ, JOSEF	017	0.50	285.00
08/13/19	EMAIL TO M. NEIBURG REGARDING DOCUMENT DELIVERY TIMING	MINTZ, JOSEF	017	0.20	114.00
08/13/19	NOTES TO AND FROM J. LUCIAN AND J. MINTZ ON ACTION PLAN FOR BECHTEL AND OTHER ACTIONS, INCLUDING PREFERENCES	SCHAEDLE, MICHAEL	017	0.50	405.00
08/19/19	ATTENTION TO BECHTEL MATTERS	LUCIAN, JOHN	017	0.30	214.50
08/27/19	REVIEW STATUS OF EPRODUCTION	SCHAEDLE, MICHAEL	017	0.20	162.00
08/28/19	DISCUSS RESEARCH NEEDED IN CONNECTION WITH COMMITTEE INVESTIGATION MATTERS WITH J. LUCIAN	BIBILONI, JOSE	017	0.10	42.00
08/28/19	ANALYZE BECHTEL/D&O ISSUES	LUCIAN, JOHN	017	0.80	572.00
08/28/19	STRATEGIZE WITH M. SCHAEDELE AND J. LUCIAN REGARDING INVESTIGATION ISSUES AND RELATED STRATEGY	MINTZ, JOSEF	017	0.50	285.00
08/28/19	STRATEGIZE WITH J. LUCIAN, J. MINTZ AND J. BIBILONI REGARDING BECHTEL INVESTIGATION	SCHAEDLE, MICHAEL	017	1.00	810.00
08/28/19	REVIEW MATERIAL RELATING TO CERTAIN BOARD AND GOVERNANCE MATTERS	SCHAEDLE, MICHAEL	017	1.00	810.00
08/29/19	EMAILS WITH PRACTICE TECHNOLOGY REGARDING INCOMING DOCUMENT PRODUCTION	MINTZ, JOSEF	017	0.30	171.00
08/30/19	CONFER WITH J. LUCIAN AND J. MINTZ RE RESEARCH NEEDED IN CONNECTION WITH COMMITTEE INVESTIGATION.	BIBILONI, JOSE	017	0.90	378.00
08/30/19	DISCUSSION WITH J. BIBILONI REGARDING RESEARCH NEEDED FOR INVESTIGATION OF COMPANY	MINTZ, JOSEF	017	0.50	285.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 13

INVOICE NO. 1855743

NOVEMBER 11, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
<b>017 INVESTIGATION OF COMPANY</b>				<b>19.00</b>	<b>13,130.00</b>
<b>TASK: 019 LITIGATION</b>					
08/02/19	REVIEW WILLIAMS BINDER AND INITIAL REVIEW OF BUDGET MATTERS	SCHAEDLE, MICHAEL	019	1.30	1,053.00
08/03/19	EMAILS RE: WILLIAMS LITIGATION	LUCIAN, JOHN	019	0.30	214.50
08/05/19	REVIEW WILLIAMS SCHEDULING ORDER REVISIONS (.4); EMAILS WITH J. LUCIAN REGARDING SAME (.2); EMAIL TO B. FELDMAN REGARDING SAME (.2)	MINTZ, JOSEF	019	0.80	456.00
08/05/19	REVIEW WILLIAMS PRE TRIAL ORDER AND NOTES TO AND FROM J. LUCIAN AND J. MINTZ	SCHAEDLE, MICHAEL	019	0.20	162.00
08/07/19	REVIEW PAPERS RELATED TO PRIME NDT HEARING ON PARTIAL MOTION TO DISMISS IN CONNECTION WITH ORAL ARGUMENT ON SAME.	BIBILONI, JOSE	019	0.20	84.00
08/07/19	COORDINATE WITH COURTCALL RE TELEPHONIC APPEARANCE OF J. BIBILONI AT AUGUST 8, 2019 ORAL ARGUMENT IN ADVERSARY PROCEEDING NO. 19-50180 (WELDED V. PRIME NDT SERVICES)	LEWIS, CHRISTOPHER	019	0.20	67.00
08/07/19	EMAILS RE: PRIME NDT LITIGATION	LUCIAN, JOHN	019	0.20	143.00
08/07/19	NOTE TO AND FROM J. MINTZ ON PRIME NDT	SCHAEDLE, MICHAEL	019	0.10	81.00
08/07/19	REVIEW WILLIAMS RESPONSES (.9) AND PAPERS; NOTE TO J. BIBILONI REGARDING SAME (.1)	SCHAEDLE, MICHAEL	019	1.00	810.00
08/08/19	REVIEW AND ASSESS PAPERS IN WILLIAMS ADVERSARY PROCEEDING AND SEND SAME TO M. SCHAEDELE.	BIBILONI, JOSE	019	0.60	252.00
08/08/19	PREPARE FOR AND MONITOR ORAL ARGUMENT ON PRIME NDT'S MOTION FOR PARTIAL SUMMARY JUDGMENT TELEPHONICALLY, AS WELL AS INITIAL PREPARATION OF A SUMMARY OF THE PROCEEDING.	BIBILONI, JOSE	019	1.10	462.00
08/08/19	REVIEW EARTH PIPELINE LITIGATION PAPERS	SCHAEDLE, MICHAEL	019	1.10	891.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 14

INVOICE NO. 1855743

NOVEMBER 11, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
08/09/19	DISCUSS STATUS OF EARTH PIPELINE ADVERSARIES WITH M. SCHAEDELE, J. MINTZ, AND M. KASLOW.	BIBILONI, JOSE	019	0.20	84.00
08/09/19	DISCUSSION WITH J. BIBILONI REGARDING PRIME NDT HEARING	MINTZ, JOSEF	019	0.30	171.00
08/12/19	REVIEW DEBTOR RESPONSIVE PAPERS IN WILLIAMS ADVERSARY	SCHAEDELE, MICHAEL	019	0.50	405.00
08/12/19	REVIEW EARTH PIPELINE PAPERS	SCHAEDELE, MICHAEL	019	0.60	486.00
08/13/19	REVIEW AND ASSESS COURT'S OPINION DENYING PRIME'S PARTIAL MOTION TO DISMISS AND CIRCULATE CASE AND SUMMARY OF SAME TO M. SCHAEDELE, J. LUCIAN, AND J. MINTZ.	BIBILONI, JOSE	019	0.60	252.00
08/13/19	REVIEW DECISION ON PRIMENDT MOTION TO DISMISS	SCHAEDELE, MICHAEL	019	0.60	486.00
08/14/19	REVIEW COURT'S OPINION AND ORDER DENYING PRIME NDT DISMISSAL MOTION	MINTZ, JOSEF	019	0.60	342.00
08/15/19	REVIEW DRAFT MOTION FOR SUMMARY JUDGMENT AGAINST WILLIAMS	MINTZ, JOSEF	019	1.20	684.00
08/15/19	REVIEW WELDED DISPOSITIVE MOTION IN WILLIAMS ADVERSARY	SCHAEDELE, MICHAEL	019	0.80	648.00
08/16/19	EMAILS WITH M. SCHAEDELE AND J. LUCIAN RE DEBTORS' DRAFT MOTION FOR PARTIAL SUMMARY JUDGMENT IN WILLIAMS ADVERSARY PROCEEDING AND ASSIST M. SCHAEDELE IN PULLING CASES IN REVIEW OF SAME.	BIBILONI, JOSE	019	0.20	84.00
08/16/19	ADDITIONAL REVIEW OF WILLIAMS SJ MOTION AND NOTE TO J. LUCIAN	SCHAEDELE, MICHAEL	019	0.70	567.00
08/19/19	REVIEW WILLIAMS ADVERSARY PAPERS, INCLUDING CHUBB STATEMENT IN SUPPORT OF DEBTORS' OPPOSITION TO WILLIAMS MOTION TO ABSTAIN/TRANSFER/DISMISS AND STATUS OF BRIEFING ON WILLIAMS' MOTION.	BIBILONI, JOSE	019	0.30	126.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS  
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 15

INVOICE NO. 1855743

NOVEMBER 11, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
08/19/19	ATTENTION TO DEBTORS' DRAFT MOTION FOR PARTIAL SUMMARY JUDGMENT IN WILLIAMS ADVERSARY PROCEEDING AND EMAILS WITH J. LUCIAN AND M. SCHAEDELE RE SAME.	BIBILONI, JOSE	019	0.40	168.00
08/19/19	DISCUSS WILLIAMS SJ MOTION WITH J. LUCIAN	SCHAEDELE, MICHAEL	019	0.20	162.00
08/19/19	REVIEW DECISION RELATING TO WILLIAMS SJ MOTION	SCHAEDELE, MICHAEL	019	0.40	324.00
08/21/19	DISCUSS DEBTORS' DRAFT OF WILLIAMS ADVERSARY PAPERS WITH M. SCHAEDELE (.1); CALL WITH J. MULVIHILL RE COMMENTS TO SAME (.2).	BIBILONI, JOSE	019	0.30	126.00
08/21/19	REVIEW WILLIAMS DISPOSITIVE MOTION PRACTICE; DISCUSS WITH J. BIBILONI; NOTE TO J. LUCIAN REGARDING SAME	SCHAEDELE, MICHAEL	019	0.10	81.00
08/22/19	REVIEW SCHEDULING ORDER ENTERED IN THE WILLIAMS ADVERSARY PROCEEDING.	BIBILONI, JOSE	019	0.20	84.00
08/22/19	DISCUSS ORAL ARGUMENT ON WILLIAMS MOTION TO ABSTAIN/TRANSFER/DISMISS WITH J. LUCIAN AND REACTION TO SAME (.2); EMAIL TO COMMITTEE MEMBERS FROM J. LUCIAN REGARDING ORAL ARGUMENT (.1).	BIBILONI, JOSE	019	0.30	126.00
08/22/19	PREPARE COMMITTEE REPORT RE: TRANSCO LITIGATION; UPDATE BR TEAM	LUCIAN, JOHN	019	0.50	357.50
08/22/19	REPORT FROM J. LUCIAN ON WILLIAMS MOTION ON TRANSFER AND RELATED MATTER	SCHAEDELE, MICHAEL	019	0.40	324.00
08/27/19	REVIEW EARTH PIPELINE LITIGATION STATUS	SCHAEDELE, MICHAEL	019	0.40	324.00
	<b>019 LITIGATION</b>			<b>16.90</b>	<b>11,087.00</b>
<b>TASK: 021 OMNIBUS COURT HEARING - PREPARATION/ ATTENDANCE</b>					
08/05/19	REVIEW AGENDA FOR SCHEDULED 8-7 HEARING.	BIBILONI, JOSE	021	0.10	42.00
08/20/19	REVIEW AGENDA FOR MATTERS GOING FORWARD AT AUGUST 22 OMNIBUS HEARING.	BIBILONI, JOSE	021	0.20	84.00

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

PAGE NUMBER: 16  
 INVOICE NO. 1855743  
 NOVEMBER 11, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
08/21/19	DISCUSS AUGUST 22 OMNIBUS HEARING WITH A. MIELKE (YCST) (.1); CONFER WITH J. LUCIAN RE SAME (.1).	BIBILONI, JOSE	021	0.20	84.00
08/22/19	PREPARE FOR AND PARTICIPATE IN OMNIBUS HEARING	LUCIAN, JOHN	021	1.80	1,287.00
	<b>021 OMNIBUS COURT HEARING - PREPARATION/ ATTENDANCE</b>			<b>2.30</b>	<b>1,497.00</b>
<b>TOTAL SERVICES</b>				<b>\$</b>	<b>60,904.50</b>

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

DATE	DESCRIPTION	AMOUNT
08/09/2019	MISCELLANEOUS: CHRISTOPHER LEWIS COURTCALL - TELEPHONIC APPEARANCE OF J. BIBILONI AT AUGUST 8, 2019 HEARING ON 08/09/19	37.00
08/22/2019	WESTLAW BIBILONI,JOSE	115.71
08/27/2019	WESTLAW BIBILONI,JOSE	21.42
	CONTRACTED PHOTOCOPYING	29.76
	DOCKET SEARCHES	101.90
	REPRODUCTION OF DOCUMENTS	78.40
<b>TOTAL DISBURSEMENTS</b>		<b>\$ 384.19</b>

**CURRENT INVOICE TOTAL** **\$ 61,288.69**

**TIME AND FEE SUMMARY**

TIMEKEEPER	RATE	HOURS	FEES
CHRISTOPHER A. LEWIS	335.00	19.70	6,599.50
FREDERICK G. SANDSTROM	610.00	4.20	2,562.00
JOHN E. LUCIAN	715.00	9.80	7,007.00
JOSE F. BIBILONI	420.00	34.30	14,406.00
JOSEF W. MINTZ	570.00	22.80	12,996.00
MICHAEL B. SCHAEDEL	810.00	21.40	17,334.00
<b>TOTALS</b>		<b>112.20</b>	<b>\$ 60,904.50</b>

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

<b>EXPENSE CATEGORY</b>	<b>SERVICE PROVIDER</b>	<b>TOTAL EXPENSES</b>
Reproduction of Documents	In-house / Parcels, Inc.	\$108.16
CourtCall Reservation	CourtCall	\$37.00
Docket Searches	PACER	\$101.90
Legal Research	Lexis / Westlaw	\$137.13
<b>TOTAL:</b>		<b>\$384.19</b>



**CERTIFICATE OF SERVICE**

I, Jose F. Bibiloni hereby certify that on November 12, 2019, I served or caused to be served the foregoing *Tenth 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 August 1, 2019 through August 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: Jane M. Leamy, Esq.  
J. Caleb Boggs Federal Building, Suite 2207  
Lockbox 35  
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)