

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

In re:)
) Chapter 11
)
WELDED CONSTRUCTION, L.P., *et al.*,¹) Case No. 18-12378 (KG)
)
Debtors.) (Jointly Administered)
)
)
)

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON NOVEMBER 18, 2019 AT 10:00 A.M. (ET)**

MATTER UNDER CERTIFICATION

1. Debtors' Motion for Order (I) Authorizing the Private Sale of the Debtors' Headquarters Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (II) Approving the Purchase Agreement; and (III) Granting Related Relief [D.I. 1066, 10/25/19]

Response/Objection Deadline: November 8, 2019 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Informal Response from Oracle Corporation
- B. Informal Response from the Office of the United States Trustee for the District of Delaware

Related Documents:

- C. Declaration of Jerry Malek in Support of Debtors' Motion for Order (I) Authorizing the Private Sale of the Debtors' Headquarters Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (II) Approving the Purchase Agreement; and (III) Granting Related Relief [D.I. 1084, 11/6/19]
- D. Certification of Counsel [D.I. 1096, 11/14/19]
- E. Proposed Order

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.



Status: A certification of counsel has been filed. No hearing is required unless the Court feels it is necessary.

ADJOURNED MATTERS

2. Debtors' Second Omnibus Motion for Entry of an Order, Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code, Authorizing the Debtors to Reject Certain Unexpired Leases *Nunc Pro Tunc* to the Lease Rejection Date and Certain Executory Contracts [D.I. 318, 12/7/18]

Response/Objection Deadline: December 21, 2018 at 4:00 p.m. (ET); extended for Ohio Machinery Company to January 3, 2019 at 4:00 p.m. (ET); extended to January 8, 2019 at 4:00 p.m. (ET) for VFS Leasing, PipeLine Machinery, Barco Rent-a-Truck, and the Committee

Responses/Objections Received:

- A. Limited Objection of Caterpillar Financial Services Corporation [D.I. 346, 12/20/18]
- B. Objection of PACCAR Financial Corp. [D.I. 348, 12/20/18]
- C. Joinder of MacAllister Machinery Co., Inc. d/b/a MacAllister Rentals and Michigan CAT to Limited Objection of Caterpillar Financial Services Corporation [D.I. 355, 12/21/18]
- D. Limited Objection of Enviro Service Rentals, LLC, Cross Country Pipeline Supply Co., Inc., Outlaw Padding Company and T & C Rentals [D.I. 357, 12/21/18]
- E. Limited Objection of Sunbelt Equipment Marketing, Inc. and Sunbelt Tractor & Equipment Company, Inc. [D.I. 358, 12/21/18]
- F. Objection of Ohio Machinery Company [D.I. 367, 12/24/18]
- G. Objection of VFS Leasing Co. [D.I. 397, 1/8/19]

Related Documents:

- H. Order [D.I. 421, 1/15/19]
- I. Order [D.I. 442, 1/28/19]
- J. Order [D.I. 446, 1/30/19]

Status: Orders have been entered resolving items A, B, C and G. This matter is adjourned to the omnibus hearing date scheduled on December 16, 2019 at 3:00 p.m. (ET) only as it pertains to the unresolved objections in items D, E, and F.

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

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

Responses/Objections Received: None to date

Related Documents:

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

Status: This matter is adjourned to the omnibus hearing date scheduled on December 16, 2019 at 3:00 p.m. (ET).

4. Debtors' Tenth (10th) Omnibus (Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1 [D.I. 1040, 9/30/19]

Response/Objection Deadline: October 15, 2019 at 4:00 p.m. (ET); extended for Whiteford Kenworth to November 11, 2019 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Informal response of Whiteford Kenworth
B. Response of Edward D. McNally [D.I. 1055, 10/16/19]

Related Documents:

- C. Order [D.I. 1059, 10/18/19]
D. Certification of Counsel [D.I. 1085, 11/7/19]
E. Order [D.I. 1086, 11/8/19]

Status: This matter is adjourned to the omnibus hearing date scheduled on December 16, 2019 at 3:00 p.m. (ET) with respect to item B. Orders have been entered addressing all other claims.

Dated: November 14, 2019
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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