

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: )  
 ) Chapter 11  
 )  
WELDED CONSTRUCTION, L.P., *et al.*,<sup>1</sup> ) Case No. 18-12378 (KG)  
 )  
Debtors. ) (Jointly Administered)  
 )  
 )  
 ) Objection Deadline: December 4, 2019 at 4:00 p.m. (ET)  
 ) Hearing Date: December 16, 2019 at 3:00 p.m. (ET)

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**NOTICE OF FOURTH INTERIM FEE REQUEST OF THE  
DEBTORS' PROFESSIONALS FOR THE PERIOD FROM  
JULY 1, 2019 THROUGH AND INCLUDING SEPTEMBER 30, 2019**

TO: (I) THE DEBTORS; (II) THE U.S. TRUSTEE; (III) COUNSEL FOR THE DEBTORS' POSTPETITION LENDER; (IV) COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS; AND (V) ALL PARTIES THAT, AS OF THE FILING OF THIS FEE REQUEST, HAVE REQUESTED NOTICE IN THESE CHAPTER 11 CASES PURSUANT TO BANKRUPTCY RULE 2002

**PLEASE TAKE NOTICE** that, pursuant to that certain *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 230] (the “**Interim Compensation Order**”), the professionals retained by the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) hereby apply for interim quarterly allowance of compensation and reimbursement of expenses (each, a “**Fee Request**,” and collectively, the “**Fee Requests**”) for all interim monthly fee applications covering the period from July 1, 2019, through and including September 30, 2019. Summaries of the fees and expenses subject to the Fee Requests are provided in the attachments hereto and set forth in the monthly fee applications previously filed with the Court. Pursuant to the Interim Compensation Order, the Debtors were previously authorized to pay, on an interim basis, eighty (80%) percent of the amount of compensation requested and one hundred (100%) percent of the reimbursable expenses requested without further order from the Court upon the expiration of a 20-day objection period.

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<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 OBJECTIONS, IF ANY, TO A FEE REQUEST ARE REQUIRED TO BE FILED AND SERVED ON THE AFFECTED PROFESSIONAL AND THE FOLLOWING PARTIES ON OR BEFORE DECEMBER 4, 2019 AT 4:00 P.M. (ET):** (i) Welded Construction, L.P., 26933 Eckel Road, Perrysburg, Ohio 43551 (Attn: Frank A. Pometti, Chief Restructuring Officer); (ii) counsel for the Debtors, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801 (Attn: Allison S. Mielke, 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, Delaware 19801 (Attn: Jane M. Leamy, Esq.); (iv) counsel for the Debtors' postpetition lender, Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, New York 10166 (Attn: Michael A. Rosenthal, Esq. and Matthew K. Kelsey, Esq.); and (v) counsel for the Official Committee of Unsecured Creditors, Blank Rome LLP, 1201 Market Street, Suite 800, Wilmington, Delaware 19801 (Attn: Jose F. Bibiloni, Esq.).

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider approval of the Fee Requests will be held before the Honorable Kevin Gross, United States Bankruptcy Court for the District of Delaware, 824 Market Street, 6<sup>th</sup> Floor, Courtroom No. 3, Wilmington, Delaware 19801, on **DECEMBER 16, 2019 AT 3:00 P.M. (ET)**.

Dated: November 14, 2019  
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Allison S. Mielke

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Sean M. Beach (No. 4070)  
Robert F. Poppiti, Jr., (No. 5052)  
Allison S. Mielke (No. 5934)  
Betsy L. Feldman (No. 6410)  
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*Counsel to the Debtors*

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**FOURTH INTERIM FEE REQUEST OF  
YOUNG CONAWAY STARGATT & TAYLOR, LLP**

Name of Applicant:	Young Conaway Stargatt & Taylor, LLP
Authorized to Provide Professional Services to:	Debtors and Debtors-in-Possession
Date of Retention:	October 22, 2018 (Order entered November 15, 2018 [Docket No. 234])
Period for which compensation and reimbursement is sought:	July 1, 2019 through and including September 30, 2019

Monthly Fee Application Filing Date & Docket No.	Period Covered	Total Requested Fees	Total Requested Expenses	CNO Filing Date & Docket No.	Amount of Fees Paid or to be Paid (80%)	Amount of Expenses Paid or to be Paid (100%)	Amount of Holdback Fees Sought (20%)
8/21/19 D.I. 957	7/1/19 – 7/31/19	\$459,922.50	\$8,298.95	9/11/19 D.I. 996	\$367,938.00	\$8,298.95	\$91,984.50
9/17/19 D.I. 1004	8/1/19 – 8/31/19	\$568,448.00	\$5,563.21	10/8/19 D.I. 1050	\$454,758.40	\$5,563.21	\$113,689.60
10/21/19 D.I. 1061	9/1/19 – 9/30/19	\$580,684.00	\$12,216.57	11/12/19 D.I. 1093	\$464,547.20	\$12,216.57	\$116,136.80
<b>Totals</b>		<b>\$1,609,054.50</b>	<b>\$26,078.73</b>		<b>\$1,287,243.60</b>	<b>\$26,078.73</b>	<b>\$321,810.90</b>

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**FOURTH INTERIM FEE REQUEST OF  
LANDIS RATH & COBB LLP**

Name of Applicant:	Landis Rath & Cobb LLP, Special Counsel
Authorized to Provide Professional Services to:	Debtors and Debtors-in-Possession
Date of Retention:	October 22, 2018 (Order entered November 15, 2018 [Docket No. 232])
Period for which compensation and reimbursement is sought:	July 1, 2019 through and including September 30, 2019

Monthly Fee Application Filing Date & Docket No.	Period Covered	Total Requested Fees	Total Requested Expenses	CNO Filing Date & Docket No.	Amount of Fees Paid or to be Paid (80%)	Amount of Expenses Paid or to be Paid (100%)	Amount of Holdback Fees Sought (20%)
11/8/19 D.I. 1087	7/1/19 – 9/30/19	\$29,588.00	\$75.09	D/O 12/2/19	\$23,670.40	\$75.09	\$5,917.60
<b>Totals</b>		<b>\$29,588.00</b>	<b>\$75.09</b>		<b>\$23,670.40</b>	<b>\$75.09</b>	<b>\$5,917.60</b>