Case 18-12378-KG Doc 1100 Filed 11/14/10 Docket #1100 Date Filed: 11/14/2019

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

#### NOTICE OF ELEVENTH 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 SEPTEMBER 1, 2019 THROUGH SEPTEMBER 30, 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 14, 2019, the *Eleventh 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 September 1, 2019 through September 30, 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 \$55,453.20 (80% of \$69,316.50) for professional services rendered and (ii) reimbursement of expenses incurred in the amount of \$3,787.71 as counsel to the Committee during the period from September 1, 2019 through and including September 30, 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 <u>December 4, 2019 at 4:00 p.m.</u> (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>&</sup>lt;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 \$55,453.20 (80% of \$69,316.50) for services rendered to the Committee and reimbursement of \$3,787.71 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 14, 2019 Wilmington, Delaware

#### **BLANK ROME LLP**

<u>/s/ Jose F. Bibiloni</u> 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 4, 2019 at 4:00 p.m. (ET)** 

#### SUMMARY COVER SHEET TO THE ELEVENTH 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 SEPTEMBER 1, 2019 THROUGH SEPTEMBER 30, 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:	September 1, 2019 through September 30, 2019
Monthly amount of compensation sought as actual, reasonable, and necessary:	\$55,453.20 (80% of \$69,316.50)
Monthly amount of expense reimbursement sought as actual, reasonable, and necessary:	\$3,787.71
Petition date:	October 22, 2018
Date of retention:	October 30, 2018
Date of order approving employment:	December 6, 2018
<i>Total compensation approved by interim order to date:</i>	\$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>&</sup>lt;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.

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Blended rate in this application for all attorneys:	\$571.57
Blended rate in this application for all timekeepers:	\$551.44
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:	10
Number of professionals in this application not included in staffing plan:	5
Number of professionals billing fewer than 15 hours to the case during this period:	6
Are any rates higher than those approved or disclosed at retention?	Yes.
This is a(n): <u>x</u> monthly <u>interim</u> fin	al 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 5.30 hours and the corresponding compensation requested hereby is approximately \$1,894.50. By this fee application, Blank Rome requests interim allowance and payment of such fees.

Monthly 1	Fee Application	Amounts	Requested	Amounts Ap	proved to Date
Date Filed	Period Covered	Fees	Expenses	Fees	Expenses
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	\$165,094.00 (100%) D.I. 989	\$568.00 (100%) D.I. 989
7/3/2019 D.I. 819	5/1/2019 – 5/31/2019 (Seventh Monthly)	\$58,220.00	\$283.00	\$58,220.00 (100%) D.I. 989	\$283.00 (100%) D.I. 989
8/9/2019 D.I. 935	6/1/2019 – 6/30/2019 (Eighth Monthly)	\$150,175.25	\$3,629.48	\$150,175.25 (100%) D.I. 989	\$3,629.48 (100%) D.I. 989
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
11/12/2019 D.I. 1091	8/1/2019 – 8/31/2019 (Tenth Monthly)	\$60,904.50	\$384.19	Objections Due 12/2/2019	Objections Due 12/2/2019

# Summary of Monthly Fee Applications Previously Filed by Blank Rome LLP:

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

#### ELEVENTH 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 SEPTEMBER 1, 2019 THROUGH SEPTEMBER 30, 2019

This eleventh 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 September 1, 2019 through and including September 30, 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>&</sup>lt;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.

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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* 

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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.

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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) <u>Exhibit A</u> 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>&</sup>lt;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) <u>**Exhibit B**</u> attached hereto contains a summary of timekeepers for Blank Rome for these chapter 11 cases during the Application Period.
- (c) <u>Exhibit C</u> 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:
  - **<u>Question</u>**: 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.
  - **<u>Question</u>**: 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 \$69,316.50 and payment by the Debtors of 80% of this amount (\$55,453.20), and (b) the allowance and payment of 100% of its actual and necessary expenses incurred during the Application Period in the amount of \$3,787.71, 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 **125.70** hours at a blended billing rate of **\$551.44** 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 <u>Exhibit D</u>. Every effort has been made by Blank Rome to categorize daily time entries in accordance with the

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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: 1.20 Total Fees: \$972.00

This category includes Blank Rome's review and analysis of the Debtors' real estate sale process and related matters.

(Task Code 003) Avoidance Action Analysis

#### Total Hours: 11.90 Total Fees: \$6,257.50

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: 5.10Total Fees: \$2,837.00

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: 20.10 Total Fees: \$12,469.50

This category includes Blank Rome's work in reviewing and analyzing the general claims pool and certain administrative expense claim settlements with various parties in interest, as well as communications with Teneo, the Debtors, and the Committee regarding same.

# (Task Code 008)Creditors Committee<br/>(Internal / Communications with Creditors)

#### Total Hours: 2.50 Total Fees: \$1,453.00

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: 2.10 Total Fees: \$1,237.00

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 013) Fee Applications – Internal Total Hours: 5.30 Total Fees: \$1,894.50

This category includes Blank Rome's work preparing and filing its third interim fee application and related papers, as well as initial preparation of its tenth monthly fee application (August 2019).

# (Task Code 014) Fee Applications – Others

#### Total Hours: 3.60 Total Fees: \$1,359.00

This category includes Blank Rome's work preparing and filing Teneo's tenth monthly fee application (August 2019) and the order approving the Committee professionals' third interim fee applications in these cases.

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

#### Total Hours: 61.30 Total Fees: \$33,505.00

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

#### (Task Code 019) Litigation

#### Total Hours: 0.90 Total Fees: \$574.00

This category includes Blank Rome's work reviewing and analyzing litigation issues related to the Prime NDT adversary proceeding.

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

Total Hours: 0.10 Total Fees: \$42.00

This category includes Blank Rome's work reviewing the agenda for the September 23rd hearing.

# (Task Code 022) Plan and Disclosure Statement

#### Total Hours: 9.60 Total Fees: \$5,576.00

This category includes Blank Rome's work researching and analyzing various issues in connection with Debtors' chapter 11 plan strategy and communications with Teneo relating to same.

#### (Task Code 024) Relief from Stay and Adequate Protection

#### Total Hours: 2.00 Total Fees: \$1,140.00

This category includes Blank Rome's work in connection with the review and analysis of various motions for relief from the automatic stay filed in the cases.

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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 <u>Exhibit D</u> 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 \$3,787.71 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 <u>Exhibit E</u>. 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

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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 \$55,453.20 (80% of \$69,316.50), together with the reimbursement of expenses incurred in the amount of \$3,787.71, and such other and further relief that the Court deems just, proper and necessary.

#### [Signature follows]

Dated: November 14, 2019 Wilmington, Delaware

#### **BLANK ROME LLP**

<u>/s/ Jose F. Bibiloni</u> 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 (SEPTEMBER 1, 2019 THROUGH SEPTEMBER 30, 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.

	BLENDED HOURLY RATES				
CATEGORY OF Timekeeper	Non-Bankruptcy Engagements All Domestic Offices as of January 1, 2019 <sup>1</sup>	CURRENT Application Period			
Partner	\$790.00	\$625.09			
Counsel	\$651.00	\$570.00			
Associate	\$463.00	\$432.73			
Paralegal	\$294.00	\$335.00			
Aggregated:	\$637.00 (average)	\$551.44 (blended)			

<sup>&</sup>lt;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.

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# EXHIBIT B

### SUMMARY OF TIMEKEEPERS INCLUDED IN THIS FEE APPLICATION (SEPTEMBER 1, 2019 THROUGH SEPTEMBER 30, 2019)

NAME	POSITION	DEPARTMENT	DATE OF ADMISSION(S)	HOURS BILLED	FEES BILLED	HOURLY	HOURLY RATE		FEES BILLED USING RATES DISCLOSED
	POSITION					In This Fee Application	During First Monthly Fee Application Period	SINCE RETENTION	AT RETENTION
Michael B. Schaedle	Partner	Finance, Restructuring and Bankruptcy	Member of PA and NJ Bars since 1992; Member of NY Bar since 2012	21.80	\$17,658.00	\$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	4.00	\$2,860.00	\$715.00	\$690.00	1	\$2,760.00
Frederick G. Sandstrom	Partner	Labor & Employment	Member of IL Bar since 2002; Member of DC Bar since 2005; Member of PA Bar since 2012	1.0	\$610.00	\$610.00	N/A	N/A	\$610.00
Stanley B. Tarr	Partner	Finance, Restructuring and Bankruptcy	Member of NY Bar since 2005; Member of PA and DE Bars since 2010	7.0	\$4,620.00	\$660	N/A	N/A	\$4,620.00
Josef W. Mintz	Of Counsel	Finance, Restructuring and Bankruptcy	Member of PA and NJ Bars since 2008; Member of DE Bar since 2011	35.80	\$20,406.00	\$570.00	\$535.00	1	\$19,153.00

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NAME	POSITION	DEPARTMENT	DATE OF ADMISSION(S)	HOURS BILLED	FEES BILLED	HOURLY RATE		HOURLY RATE		NUMBER OF RATE INCREASES SINCE RETENTION	FEES BILLED USING RATES DISCLOSED AT RETENTION
Matthew E. Kaslow	Associate	Finance, Restructuring and Bankruptcy	Member of NJ Bar since 2015; Member of PA Bar since 2016	17.30	\$7,612.00	\$440.00	N/A	N/A	\$7,612.00		
Jose F. Bibiloni	Associate	Finance, Restructuring and Bankruptcy	Member of DE Bar since 2016; Member of PA Bar since 2017	23.30	\$9,786.00	\$420.00	\$355.00	2	\$8,271.50		
Philip M. Guffy	Associate	Finance, Restructuring and Bankruptcy	Member of NY Bar since 2016; Member of TX Bar since 2019	5.30	\$2,464.50	\$465.00	N/A	N/A	\$2,464.50		
Christopher A. Lewis	Paralegal	Finance, Restructuring and Bankruptcy	N/A	8.40	\$2,814.00	\$335.00	\$330.00	1	\$2,772.00		
Michael Matthews	Practice Technology Project Manager		N/A	1.80	\$486.00	\$270.00	N/A	N/A	\$486.00		
	ТО	TALS:		125.70	\$69,316.50				\$65,441.00		

# EXHIBIT C

### STAFFING PLAN FOR BLANK ROME LLP FOR THE PERIOD SEPTEMBER 1, 2019 THROUGH SEPTEMBER 30, 2019

CATEGORY OF TIMEKEEPER	NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER DURING THE APPLICABLE PERIOD <sup>1</sup>	AVERAGE HOURLY RATE
Partners	2	\$762.50
Counsel	1	\$570.00
Associates	1	\$420.00
Paralegals	1	\$335.00

#### **STAFFING PLAN:**

<sup>&</sup>lt;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 75% 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 (SEPTEMBER 1, 2019 THROUGH SEPTEMBER 30, 2019)

TASK CODE	TASK DESCRIPTION	NUMBER OF HOURS	AMOUNT OF FEES
001	Asset Sales / Disposition	1.20	\$972.00
003	Avoidance Action Analysis	11.90	\$6,257.50
006	Case Administration (General)	5.10	\$2,837.00
007	Claims Administration and Objections	20.10	\$12,469.50
008	Creditors Committee	2.50	\$1,453.00
009	Employee Benefits and Pension	2.10	\$1,237.00
013	Fee Applications - Internal	5.30	\$1,894.50
014	Fee Applications – Others	3.60	\$1,359.00
017	Investigation of Company	61.30	\$33,505.00
019	Litigation	0.90	\$574.00
021	Omnibus Court Hearing	0.10	\$42.00
022	Plan and Disclosure Statement	9.60	\$5,576.00
024	Relief from Stay and Adequate Protection	2.00	\$1,140.00
	TOTALS:	125.70	\$69,316.50

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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: MATTER NO. INVOICE NO. NOVEMBER 14, 2019 154278-01600 04015 1856966

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

#### FOR LEGAL SERVICES RENDERED THROUGH SEPTEMBER 30, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
TASK: 001	ASSET SALES/DISPOSITION				
09/17/19	NOTES TO AND FROM BR WORKING GROUP ON: (I) CG STATUS; (II) HQ SALE STATUS; (III) WILLIAMS STATUS; (IV) PRIME NDT STATUS; (IV) BECHTEL INVESTIGATION MATTERS; (V) PREFERENCE MATTERS; AND (VI) CLAIMS RECONCILIATION	SCHAEDLE, MICHAEL	001	0.90	729.00
09/20/19	NOTE TO AND FROM M. LUNN REGARDING EXTENSION OF GBRB AGREEMENT	SCHAEDLE, MICHAEL	001	0.30	243.00
	001 ASSET SALES/DISPOSITION			1.20	972.00
TASK: 003	AVOIDANCE ACTION ANALYSIS				
09/03/19	FURTHER RESEARCH PREFERENCE RELATED ISSUES AND DEFENSES TO SUCH CLAIMS PER J. MINTZ REQUEST AND INITIAL PREPARATION OF DETAILED EMAIL MEMORANDUM RELATED TO SAME.	BIBILONI, JOSE	003	3.30	1,386.00
09/04/19	RESEARCH ISSUES RELATED TO PREFERENTIAL TRANSFER CLAIMS AND DEFENSES TO SAME PER J. MINTZ REQUEST AND PREPARATION OF DETAILED EMAIL MEMORANDUM RE SAME.	BIBILONI, JOSE	003	2.40	1,008.00
09/04/19	OUTLINE ACTION PLAN IN RESPECT OF PREFERENCE PROGRAM	SCHAEDLE, MICHAEL	003	1.00	810.00

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WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS COMMITTEE FILE NUMBER: 154278-01600				PAGE NUMBER: 2 INVOICE NO. 1856966 NOVEMBER 14, 2019		
DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT	
09/05/19	FINALIZE MEMORANDUM REGARDING PREFERENTIAL TRANSFER CLAIM ISSUES/DEFENSES AND SEND SAME TO J. MINTZ.	BIBILONI, JOSE	003	1.30	546.00	
09/10/19	EMAILS WITH J. MINTZ, J. LUCIAN, AND M. SCHAEDLE RE PREFERENCE CLAIM/DEFENSE RESEARCH.	BIBILONI, JOSE	003	0.30	126.00	
09/10/19	DISCUSS PREFERENCE ANALYSIS AND RELATED MATTER WITH J. MINTZ	SCHAEDLE, MICHAEL	003	1.00	810.00	
09/12/19	PREPARE FOR AND PARTICIPATE IN CALL WITH O. STEVENS (TENEO) AND J. MINTZ RE PREFERENCE CLAIM ANALYSIS (.5); CONFER WITH J. MINTZ RE SAME FOLLOWING CALL (.2).	BIBILONI, JOSE	003	0.70	294.00	
09/13/19	CALL WITH B. FELDMAN REGARDING RELEASES IN CUSTOMER COMPLETION AGREEMENTS IN CONNECTION WITH ANALYSIS OF PREFERENCE ISSUES.	BIBILONI, JOSE	003	0.20	84.00	
09/13/19	STRATEGY/ANALYSIS OF PREFERENCE ACTIONS AND DEFENSES	LUCIAN, JOHN	003	0.70	500.50	
09/13/19	DISCUSS NORMING PREFERENCE ANALYSIS FOR CERTAIN ISSUES WITH J. MINTZ	SCHAEDLE, MICHAEL	003	0.20	162.00	
09/17/19	TASK S. TARR ON PREFERENCE NORMING MATTERS	SCHAEDLE, MICHAEL	003	0.40	324.00	
09/18/19	DISCUSS PREFERENCE RELEASE ISSUES WITH J. MINTZ (.2); CALL WITH B. FELDMAN (YCST) RE SAME (.1).	BIBILONI, JOSE	003	0.30	126.00	
09/18/19	NOTE TO AND FROM E. NEIGER REGARDING PREFERENCE ISSUES	SCHAEDLE, MICHAEL	003	0.10	81.00	
	003 AVOIDANCE ACTION ANALYSIS			11.90	6,257.50	
TASK: 006	CASE ADMINISTRATION (GENERAL)					
09/09/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.80	268.00	
09/11/19	MEETING WITH BEACH TO REVIEW PENDING MATTERS	LUCIAN, JOHN	006	0.80	572.00	
09/17/19	REVIEW WELDED PROFESSIONALS' CALL SUMMARY SENT BY M. SCHAEDLE AND QUESTIONS RELATED TO SAME (.1); REVIEW J. MINTZ RESPONSES TO SAME (.1).	BIBILONI, JOSE	006	0.20	84.00	

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COMMITT	CONSTRUCTION, L.P. UNSECURED CREDITORS EE BER: 154278-01600			PAGE NUMBER: 3 INVOICE NO. 1856966 NOVEMBER 14, 2019		
DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT	
09/17/19	REVIEW AGENDA FOR PROFESSIONALS CALL	SCHAEDLE, MICHAEL	006	0.20	162.00	
09/17/19	REVIEW TENEO ANALYSIS OF CASH POSITION	SCHAEDLE, MICHAEL	006	0.40	324.00	
09/17/19	PARTICIPATE IN PROFESSIONALS CALL ON STATUS OF VARIOUS MATTERS	SCHAEDLE, MICHAEL	006	0.50	405.00	
09/18/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.80	268.00	
09/18/19	REVIEW ALIX BUDGET MATERIALS	SCHAEDLE, MICHAEL	006	0.40	324.00	
09/24/19	NOTE TO AND FROM J. MINTZ REGARDING PROFESSIONALS CALL	SCHAEDLE, MICHAEL	006	0.20	162.00	
09/25/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.80	268.00	
	006 CASE ADMINISTRATION (GENERAL)			5.10	2,837.00	
TASK: 007	CLAIMS ADMINISTRATION AND OBJECTIONS					
09/03/19	EMAILS WITH B. FELDMAN REGARDING ADMINISTRATIVE EXPENSE SETTLEMENTS WITH UNION/EXPRESS, MACALLISTER AND YAK MAT	MINTZ, JOSEF	007	0.30	171.00	
09/04/19	REVIEW AND DILIGENCE ADMINISTRATIVE EXPENSE CLAIM SETTLEMENTS REACHED WITH MACALLISTER (.6), YAK MAT (.5) AND UNION LEASING (.6); DETAILED EMAIL TO TENEO REGARDING SAME (.6)	MINTZ, JOSEF	007	2.30	1,311.00	
09/04/19	REVIEW J. MINTZ REPORT ON ADMIN CLAIM SETTLEMENTS	SCHAEDLE, MICHAEL	007	0.20	162.00	
09/04/19	CONSIDER BECHTEL ADMINISTRATIVE CLAIM ISSUES	SCHAEDLE, MICHAEL	007	0.50	405.00	
09/06/19	DRAFT AND SEND DETAILED EMAIL UPDATE TO COMMITTEE REGARDING ADMINISTRATIVE EXPENSE CLAIM SETTLEMENTS REACHED WITH MACALLISTER, YAK MAT AND UNION LEASING	MINTZ, JOSEF	007	0.70	399.00	
09/09/19	EMAILS WITH O. STEVENS (TENEO) RE CLAIMS POOL REVIEW (.1); ASSIST O. STEVENS IN CLAIMS POOL ANALYSIS (.3).	BIBILONI, JOSE	007	0.40	168.00	

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS COMMITTEE FILE NUMBER: 154278-01600				INVOIC	E NUMBER: 4 CE NO. 1856966 MBER 14, 2019
DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
09/09/19	EMAIL TO B. FELDMAN REGARDING SETTLEMENTS WITH ADMINISTRATIVE EXPENSE CLAIMANTS	MINTZ, JOSEF	007	0.20	114.00
09/10/19	EMAIL TO B. FELDMAN REGARDING ADMINISTRATIVE CLAIM ORDERS (.3); FOLLOW UP REGARDING EXPRESS 4X4 (.2)	MINTZ, JOSEF	007	0.50	285.00
09/13/19	REVIEW SLIDES REGARDING CLAIMS POOL ANALYSIS SENT BY TENEO.	BIBILONI, JOSE	007	0.10	42.00
09/18/19	REVIEW DOCKET AND CLAIMS REGISTER AND CIRCULATE DOCUMENTS RELATED TO CRC-EVANS CLAIM	LEWIS, CHRISTOPHER	007	0.30	100.50
09/18/19	REVIEW PROPOSED ORDER ON CRC-EVANS CLAIM RESOLUTION (.5); EMAILS WITH B. FELDMAN REGARDING SAME (.3)	MINTZ, JOSEF	007	0.80	456.00
09/18/19	REVIEW BECHTEL ADMINISTRATIVE CLAIMS (.5); PERFORM RELATED RESEARCH (1.0); EMAIL TO R. POPPITI REGARDING SAME; STRATEGIZE WITH M. SCHAEDLE REGARDING SAME (.5); EMAIL TO TENEO REGARDING SAME (.2)	MINTZ, JOSEF	007	2.20	1,254.00
09/18/19	DISCUSS BECHTEL ADMIN CLAIM WITH J. MINTZ	SCHAEDLE, MICHAEL	007	0.40	324.00
09/18/19	REVIEW BECHTEL ADMIN CLAIM REQUEST	SCHAEDLE, MICHAEL	007	0.70	567.00
09/18/19	CALL WITH M. SCHAEDLE REGARDING CASE STATUS AND REVIEW EMAILS	TARR, STANLEY	007	1.50	990.00
09/19/19	EMAILS WITH B. FELDMAN REGARDING CRC-EVANS CLAIM	MINTZ, JOSEF	007	0.70	399.00
09/19/19	EMAILS REGARDING BECHTEL ADMINISTRATIVE EXPENSE CLAIMS (.6); DISCUSSION WITH S. TARR REGARDING SAME (.4)	MINTZ, JOSEF	007	1.00	570.00
09/19/19	REVIEW TIMELINE AND CONSIDER ADMINISTRATIVE CLAIMS	TARR, STANLEY	007	2.00	1,320.00
09/20/19	EMAILS REGARDING BECHTEL ADMIN CLAIMS	MINTZ, JOSEF	007	0.20	114.00

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COMMITT	CONSTRUCTION, L.P. UNSECURED CREDITORS TEE BER: 154278-01600			INVOIC	E NUMBER: 5 E NO. 1856966 MBER 14, 2019
DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
09/20/19	CALL WITH YOUNG CONAWAY AND TENEO TEAMS REGARDING BECHTEL ADMINISTRATIVE EXPENSE CLAIMS (.7) REPORT TO M. SCHAEDLE AND J. LUCIAN REGARDING SAME (.3)	MINTZ, JOSEF	007	1.00	570.00
09/23/19	EMAIL TO B. FELDMAN REGARDING CRC-EVANS STIPULATION	MINTZ, JOSEF	007	0.20	114.00
09/24/19	ANALYZE TIMELINE AND ISSUES	TARR, STANLEY	007	2.00	1,320.00
09/26/19	NOTES TO AND FROM J. MINTZ REGARDING CENTRAL STATES CLAIM AND RELATED MATTER	SCHAEDLE, MICHAEL	007	0.40	324.00
09/26/19	CONVERSATION WITH M. SCHAEDLE (.7); FURTHER REVIEW DOCUMENTS (.8)	TARR, STANLEY	007	1.50	990.00
	007 CLAIMS ADMINISTRATION AND OBJEC	ΓIONS		20.10	12,469.50
TASK: 008	CREDITORS COMMITTEE (INTERNAL/COMMI	UNICATION W/CREDIT	0		
09/11/19	CONFER WITH J. MINTZ RE COMMITTEE UPDATE CALL AND PLANNING RELATED TO SAME.	BIBILONI, JOSE	008	0.10	42.00
09/12/19	EMAILS WITH COMMITTEE MEMBER RE UPDATE CALL.	BIBILONI, JOSE	008	0.10	42.00
09/17/19	EMAIL TO M. SCHAEDLE REGARDING OPEN ISSUES	MINTZ, JOSEF	008	0.50	285.00
09/20/19	UPDATE CALL WITH CHUBB AND NOTE TO FILE RE: SAME	LUCIAN, JOHN	008	0.40	286.00
09/20/19	DRAFT AND SEND DETAILED EMAIL TO COMMITTEE REGARDING CRC-EVANS AND HTE SETTLEMENTS	MINTZ, JOSEF	008	1.20	684.00
09/24/19	EMAIL TO A. MIELKE REGARDING COMMITTEE PROFESSIONAL CALL	MINTZ, JOSEF	008	0.20	114.00
	008 CREDITORS COMMITTEE (INTERNAL/C	OMMUNICATION W/CR	EI	2.50	1,453.00
TASK: 009	EMPLOYEE BENEFITS AND PENSION				
09/18/19	EMAILS WITH G. SANDSTROM REGARDING CENTRAL STATES CLAIM	MINTZ, JOSEF	009	0.40	228.00
09/18/19	CORRESPOND WITH J. MINTZ REGARDING STATUS OF ERISA WITHDRAWAL LIABILITY APPEAL	SANDSTROM, FREDERICK	009	0.20	122.00
09/19/19	EMAILS WITH G. SANDSTROM REGARDING CENTRAL STATES CLAIM	MINTZ, JOSEF	009	0.30	171.00

COMMITT	CONSTRUCTION, L.P. UNSECURED CREDITORS TEE BER: 154278-01600			INVOIC	E NUMBER: 6 E NO. 1856966 MBER 14, 2019
DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
09/19/19	CORRESPOND WITH YOUNG CONAWAY AND J. MINTZ REGARDING STATUS OF WITHDRAWAL LIABILITY ISSUE	SANDSTROM, FREDERICK	009	0.30	183.00
09/20/19	ANALYZE UPDATE ON WITHDRAWAL LIABILITY ISSUE FROM YOUNG CONAWAY AND DISCUSS WITH J. MINTZ	SANDSTROM, FREDERICK	009	0.30	183.00
09/26/19	EMAILS REGARDING CENTRAL STATES PENSION CLAIMS	MINTZ, JOSEF	009	0.40	228.00
09/26/19	CORRESPOND WITH J. MINTZ REGARDING STATUS OF WITHDRAWAL LIABILITY CLAIM	SANDSTROM, FREDERICK	009	0.20	122.00
	009 EMPLOYEE BENEFITS AND PENSION			2.10	1,237.00
TASK: 013	FEE APPLICATIONS - INTERNAL				
09/04/19	REVIEW DOCKET (.1) AND DRAFT CERTIFICATE OF NO OBJECTION (.2) REGARDING BLANK ROME'S THIRD INTERIM FEE APPLICATION	LEWIS, CHRISTOPHER	013	0.30	100.50
09/04/19	DRAFT PROPOSED OMNIBUS ORDER GRANTING THIRD OMNIBUS FEE APPLICATIONS (.5); DRAFT CERTIFICATION OF COUNSEL RE PROPOSED ORDER (.5)	LEWIS, CHRISTOPHER	013	1.00	335.00
09/06/19	REVIEW AND REVISE COC AND PROPOSED ORDER RE COMMITTEE PROFESSIONALS' FEE APPLICATIONS (.5); EMAIL TO C. LEWIS RE SAME (.1).	BIBILONI, JOSE	013	0.60	252.00
09/06/19	REVISE CERTIFICATION OF COUNSEL RE PROPOSED OMNIBUS ORDER GRANTING THIRD INTERIM FEE APPLICATIONS	LEWIS, CHRISTOPHER	013	0.20	67.00
09/09/19	CALL WITH C. LEWIS RE COC FOR COMMITTEE PROFESSIONALS' THIRD INTERIM FEE APPLICATION.	BIBILONI, JOSE	013	0.10	42.00
09/09/19	REVIEW AND E-FILE CERTIFICATION OF COUNSEL REGARDING PROPOSED ORDER APPROVING COMMITTEE'S THIRD INTERIM FEE APPLICATIONS (.4); COORDINATE DELIVERY OF PROPOSED ORDER TO JUDGE GROSS' CHAMBERS (.1)	LEWIS, CHRISTOPHER	013	0.50	167.50

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COMMITT	CONSTRUCTION, L.P. UNSECURED CREDITORS EE BER: 154278-01600			INVOIC	E NUMBER: 7 E NO. 1856966 MBER 14, 2019
DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
09/10/19	ATTENTION TO MATTERS RE COURT'S ORDER ON COMMITTEE PROFESSIONALS' THIRD INTERIM FEE APPLICATION AND EMAILS WITH C. LEWIS RE SERVICE OF SAME (.3); COMMUNICATIONS WITH A. STEPANYANTS (TENEO) RE SAME (.2).	BIBILONI, JOSE	013	0.50	210.00
09/10/19	REVIEW AND SERVE OMNIBUS ORDER APPROVING THIRD INTERIM FEE APPLICATION (.2); PREPARE AND E-FILE CERTIFICATE OF SERVICE RE SAME (.2)	LEWIS, CHRISTOPHER	013	0.40	134.00
09/19/19	REVIEW DOCKET AND DRAFT CERTIFICATE OF NO OBJECTION REGARDING BLANK ROME'S NINTH MONTHLY (JULY 2019) FEE APPLICATION	LEWIS, CHRISTOPHER	013	0.30	100.50
09/23/19	REVIEW DRAFT CNO ON BLANK ROME'S JULY FEE APPLICATION (.1); EMAILS WITH C. LEWIS RE FILING SAME (.1).	BIBILONI, JOSE	013	0.20	84.00
09/23/19	PREPARE AND E-FILE CERTIFICATE OF NO OBJECTION REGARDING BLANK ROME'S NINTH MONTHLY (JULY 2019) FEE APPLICATION	LEWIS, CHRISTOPHER	013	0.20	67.00
09/27/19	PREPARE BLANK ROME'S TENTH MONTHLY (AUGUST 2019) MONTHLY FEE APPLICATION	LEWIS, CHRISTOPHER	013	1.00	335.00
	013 FEE APPLICATIONS - INTERNAL			5.30	1,894.50
TASK: 014	FEE APPLICATIONS - OTHERS (INCLUDES REV	IEW AND OBJECTION	S		
09/04/19	REVIEW CERTIFICATION OF COUNSEL REGARDING DEBTORS' PROFESSIONALS' THIRD INTERIM FEE APPLICATION.	BIBILONI, JOSE	014	0.10	42.00
09/04/19	EMAILS AND CALLS WITH C. LEWIS RE DRAFT CNOS AND COC RELATED TO COMMITTEE PROFESSIONALS' THIRD INTERIM FEE APPLICATIONS AND ORDER APPROVING SAME (.2); NOTE TO AND FROM A. STEPANYANTS REGARDING TENEO'S THIRD INTERIM FEE APPLICATION (.1).	BIBILONI, JOSE	014	0.30	126.00
09/04/19	REVIEW DOCKET (.1) AND DRAFT CERTIFICATE OF NO OBJECTION (.2) REGARDING TENEO CAPITAL'S THIRD INTERIM FEE APPLICATION	LEWIS, CHRISTOPHER	014	0.30	100.50

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COMMITT	CONSTRUCTION, L.P. UNSECURED CREDITORS EE BER: 154278-01600			INVOIC	E NUMBER: 8 CE NO. 1856966 MBER 14, 2019
DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
09/05/19	REVIEW AND ASSESS CERTIFICATION OF COUNSEL PREPARED BY C. LEWIS RE COMMITTEE PROFESSIONALS' THIRD INTERIM FEE APPLICATION (.2); DISCUSSION REVISIONS OF SAME WITH C. LEWIS (.2).	BIBILONI, JOSE	014	0.40	168.00
09/11/19	REVIEW AND REVISE CNO FOR TENEO'S JULY FEE APPLICATION AND EMAILS WITH C. LEWIS RE FILING SAME.	BIBILONI, JOSE	014	0.30	126.00
09/11/19	REVIEW DOCKET AND DRAFT CERTIFICATE OF NO OBJECTION REGARDING TENEO'S JULY 2019 MONTHLY FEE APPLICATION	LEWIS, CHRISTOPHER	014	0.30	100.50
09/12/19	PREPARE AND E-FILE CERTIFICATE OF NO OBJECTION REGARDING TENEO'S JULY 2019 MONTHLY FEE APPLICATION	LEWIS, CHRISTOPHER	014	0.20	67.00
09/23/19	ATTENTION TO TENEO AUGUST FEE APPLICATION AND EMAILS WITH C. LEWIS RE SAME.	BIBILONI, JOSE	014	0.20	84.00
09/24/19	REVIEW AND REVISE TENEO'S TENTH MONTHLY (AUGUST 2019) FEE APPLICATION	LEWIS, CHRISTOPHER	014	0.40	134.00
09/26/19	EMAILS WITH C. LEWIS RE TENEO'S AUGUST FEE APPLICATION.	BIBILONI, JOSE	014	0.20	84.00
09/27/19	EMAILS WITH C. LEWIS RE TENEO AUGUST FEE APPLICATION (.1); REVIEW AND APPROVE SAME FOR FILING (.3).	BIBILONI, JOSE	014	0.30	126.00
09/30/19	PREPARE, E-FILE AND SERVE TENEO'S TENTH MONTHLY (AUGUST 2019) FEE APPLICATION	LEWIS, CHRISTOPHER	014	0.60	201.00
	014 FEE APPLICATIONS - OTHERS (INCLUDE	S REVIEW AND OBJEC	CTI	3.60	1,359.00
TASK: 017	INVESTIGATION OF COMPANY				
09/02/19	RESEARCH RELATED TO COMMITTEE INVESTIGATION, INCLUDING RESEARCH IN CONNECTION WITH CERTAIN CLAIMS OR CAUSES ACTION	BIBILONI, JOSE	017	0.80	336.00
09/03/19	FURTHER ATTENTION TO RESEARCH RELATED TO COMMITTEE INVESTIGATION, INCLUDING RESEARCH RELATED TO CERTAIN CLAIMS OR CAUSES OF ACTION	BIBILONI, JOSE	017	1.00	420.00

COMMITT	CONSTRUCTION, L.P. UNSECURED CREDITORS EE BER: 154278-01600			INVOIC	E NUMBER: 9 E NO. 1856966 MBER 14, 2019
DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
09/03/19	COORDINATE TRANSFER OF PRODUCTION DATA FROM OPPOSING COUNSEL (.1); PROCESS PRODUCT DATA FOR LOADING TO DOCUMENT DATABASE (.6)	MATTHEWS, MICHAEL	017	0.70	189.00
09/03/19	OUTLINE COMMITTE INVESTIGATION ISSUES	SCHAEDLE, MICHAEL	017	1.00	810.00
09/04/19	REVIEW DOCUMENT PRODUCTION RESULTS (.1); EMAIL TO J. LUCIAN REGARDING SAME (.2)	MINTZ, JOSEF	017	0.30	171.00
09/04/19	EMAILS WITH A. MIELKE REGARDING D&O INSURANCE (.2); EMAIL TO M. SCHAEDLE AND J. LUCIAN REGARDING SAME (.2)	MINTZ, JOSEF	017	0.40	228.00
09/05/19	ATTENTION TO RESEARCH RELATED TO COMMITTEE INVESTIGATION, INCLUDING RESEARCH RELATED TO CERTAIN CLAIMS OR CAUSES OF ACTION	BIBILONI, JOSE	017	0.30	126.00
09/05/19	DISCUSSIONS WITH J. LUCIAN AND J. MINTZ RE DOCUMENTS PRODUCED BY DEBTORS IN CONNECTION WITH COMMITTEE INVESTIGATION AND REVIEW NEEDED OF SAME.	BIBILONI, JOSE	017	0.30	126.00
09/05/19	ATTENTION TO BECHTEL INVESTIGATION DISCOVERY	LUCIAN, JOHN	017	0.30	214.50
09/05/19	DISCUSSION WITH J. BIBILONI REGARDING DOCUMENT REVIEW AND NEXT STEPS	MINTZ, JOSEF	017	0.20	114.00
09/05/19	DISCUSSION WITH J. BIBILONI REGARDING RESEARCH QUESTION	MINTZ, JOSEF	017	0.30	171.00
09/06/19	DISCUSS COMMITTEE INVESTIGATION DOCUMENT REVIEW WITH J. MINTZ AND M. KASLOW (.4); INITIAL ATTENTION TO SAME (.2).	BIBILONI, JOSE	017	0.60	252.00
09/06/19	STRATEGIZE REGARDING REVIEW OF DISCOVERY WITH J. MINTZ AND J. BIBILONI	KASLOW, MATTHEW	017	0.40	176.00
09/06/19	EMAILS WITH M. LUNN REGARDING D&O EXTENSION (.1); REVIEW POLICY (.3); EMAIL TO D. MEYER REGARDING SAME (.2)	MINTZ, JOSEF	017	0.60	342.00

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COMMITT	CONSTRUCTION, L.P. UNSECURED CREDITORS EE BER: 154278-01600			INVOIC	E NUMBER: 10 CE NO. 1856966 MBER 14, 2019
DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
09/06/19	ATTEND TO DOCUMENT REVIEW PROCESS (.3); DISCUSS REVIEW PARAMETERS WITH M. KASLOW AND J. BIBILONI (.4)	MINTZ, JOSEF	017	0.70	399.00
09/09/19	DISCUSS INVESTIGATION DOCUMENT REVIEW WITH M. KASLOW (.1); CALL WITH M. MATTHEWS RE SAME (.1).	BIBILONI, JOSE	017	0.20	84.00
09/09/19	CREATE USER CREDENTIALS FOR DATABASE ACCESS	MATTHEWS, MICHAEL	017	0.10	27.00
09/10/19	ATTENTION TO REVIEWING DOCUMENTS PRODUCED BY DEBTORS IN CONNECTION WITH COMMITTEE INVESTIGATION.	BIBILONI, JOSE	017	0.20	84.00
09/10/19	ATTENTION TO RESEARCH RELATED TO COMMITTEE INVESTIGATION, INCLUDING POTENTIAL CLAIMS OR CAUSES OF ACTION	BIBILONI, JOSE	017	0.60	252.00
09/10/19	DISCUSS REVIEW OF BECHTEL PRODUCTION WITH J. MINTZ, J. LUCIAN AND J. BIBILONI	SCHAEDLE, MICHAEL	017	0.20	162.00
09/11/19	REVIEW DOCUMENTS PRODUCED BY DEBTORS IN CONNECTION WITH COMMITTEE INVESTIGATION AND CALL WITH J. MINTZ RE SAME.	BIBILONI, JOSE	017	0.40	168.00
09/11/19	RESEARCH ISSUES RELATED TO COMMITTEE INVESTIGATION, INCLUDING POTENTIAL CLAIMS OR CAUSES OF ACTION	BIBILONI, JOSE	017	1.50	630.00
09/11/19	REVIEW NEWEST DOCUMENT PRODUCTION	KASLOW, MATTHEW	017	0.80	352.00
09/12/19	RESEARCH RELATED TO COMMITTEE INVESTIGATION, INCLUDING POTENTIAL CLAIMS OR CAUSES OF ACTION (.2); PREPARE INITIAL SUMMARY OF RESEARCH FINDINGS (.2).	BIBILONI, JOSE	017	0.40	168.00
09/12/19	FURTHER REVIEW NEWEST DOCUMENT PRODUCTION	KASLOW, MATTHEW	017	2.10	924.00
09/13/19	PARTICIPATE IN STRATEGY MEETING WITH M. SCHAEDLE, J. LUCIAN, AND J. MINTZ RE COMMITTEE INVESTIGATION AND OTHER MATTERS RELATED TO THE WELDED BANKRUPTCY CASES.	BIBILONI, JOSE	017	0.80	336.00

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COMMITT	CONSTRUCTION, L.P. UNSECURED CREDITORS TEE BER: 154278-01600			INVOIC	NUMBER: 11 E NO. 1856966 MBER 14, 2019
DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
09/13/19	RESEARCH RE COMMITTEE INVESTIGATION ISSUES, INCLUDING INTO POTENTIAL CLAIMS/CAUSES OF ACTION AND DEFENSES THERETO IN CONNECTION WITH SAME.	BIBILONI, JOSE	017	1.70	714.00
09/13/19	EMAILS TO J. MINTZ AND J. BIBILONI REGARDING STATUS OF DOCUMENT REVIEW AND PRELIMINARY FINDINGS (0.3); STRATEGIZE WITH J. MINTZ REGARDING THE SAME (0.2); FURTHER REVIEW NEWEST DOCUMENT PRODUCTION (0.2)	KASLOW, MATTHEW	017	0.70	308.00
09/13/19	STRATEGY/ANALYSIS OF BECHTEL CLAIMS	LUCIAN, JOHN	017	0.80	572.00
09/13/19	DEBRIEF WITH M. KASLOW REGARDING DOCUMENT REVIEW (.5); CALLS WITH M. KASLOW AND P. GUFFY REGARDING DOCUMENT REVIEW (.4)	MINTZ, JOSEF	017	0.90	513.00
09/13/19	DISCUSS BECHTEL INVESTIGATION AND PLAN ISSUES WITH J. LUCIAN	SCHAEDLE, MICHAEL	017	0.30	243.00
09/16/19	CONFER W. J. MINTZ, M. KASLOW RE DOCUMENT REVIEW (.8); BEGIN DOCUMENT REVIEW (1.3).	GUFFY, PHILIP	017	2.10	976.50
09/16/19	CALL WITH P. GUFFY AND IN PART WITH J. MINTZ REGARDING DOCUMENT REVIEW ISSUES	KASLOW, MATTHEW	017	0.80	352.00
09/17/19	CONTINUE DOCUMENT REVIEW.	GUFFY, PHILIP	017	1.80	837.00
09/17/19	EMAILS WITH R. POPPITI REGARDING PRIVILEGE LOG	MINTZ, JOSEF	017	0.40	228.00
09/17/19	TASK S. TARR ON BECHTEL INVESTIGATION MATTERS	SCHAEDLE, MICHAEL	017	0.40	324.00
09/18/19	CONTINUE DOCUMENT REVIEW (.1); CORRESPOND W/ M. KASLOW RE SAME (.1)	GUFFY, PHILIP	017	0.20	93.00
09/18/19	ATTENTION TO YCST DOC PRODUCTION MATTERS	LUCIAN, JOHN	017	0.40	286.00
09/18/19	REVIEW DOCUMENTS	MINTZ, JOSEF	017	1.00	570.00

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WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS COMMITTEE FILE NUMBER: 154278-01600				INVOIC	E NUMBER: 12 CE NO. 1856966 MBER 14, 2019
DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
09/18/19	EMAILS REGARDING PRIVILEGE LOG (.4); CALL WITH R. POPPITI AND M. NEIBURG REGARDING SAME (.4); FOLLOW DISCUSSIONS WITH M. SCHAEDLE AND J. LUCIAN (.4); EMAIL TO R. POPPITI AND M. NEIBURG REGARDING SAME (.3)	MINTZ, JOSEF	017	1.50	855.00
09/18/19	DISCUSS PRIVILEGE LOG WITH J. LUCIAN AND J. MINTZ IN CONNECTION WITH BECHTEL INVESTIGATION	SCHAEDLE, MICHAEL	017	0.20	162.00
09/18/19	ATTEND TO BECHTEL INVESTIGATION MATTERS	SCHAEDLE, MICHAEL	017	0.50	405.00
09/19/19	CONFER W/ M. KASLOW RE DOCUMENT REVIEW.	GUFFY, PHILIP	017	0.30	139.50
09/19/19	CONTINUE DISCOVERY REVIEW (1.4); CALL WITH P. GUFFY REGARDING THE SAME (0.1)	KASLOW, MATTHEW	017	1.50	660.00
09/19/19	PROCESS PRODUCTION DOCUMENTS FOR LOADING TO DOCUMENT DATABASE	MATTHEWS, MICHAEL	017	0.50	135.00
09/20/19	REVIEW NEW DOCUMENT PRODUCTION (.7); CONFER AND CORRESPOND W/ M. KASLOW, J. MINTZ RE SAME (.2)	GUFFY, PHILIP	017	0.90	418.50
09/20/19	CONTINUE DISCOVERY REVIEW AND CALL WITH P. GUFFY REGARDING THE SAME	KASLOW, MATTHEW	017	0.30	132.00
09/22/19	CONTINUE DISCOVERY REVIEW	KASLOW, MATTHEW	017	2.90	1,276.00
09/24/19	STRATEGIZE WITH AND GUIDANCE FROM J. MINTZ REGARDING DISCOVERY ISSUES	KASLOW, MATTHEW	017	0.40	176.00
09/24/19	CALL WITH J. MINTZ REGARDING DOCUMENT PRINTING (.1); EXPORT DOCUMENTS FROM DATABASE (.3); COORDINATE PRINTING OF DOCUMENTS WITH VENDOR (.1)	MATTHEWS, MICHAEL	017	0.50	135.00
09/24/19	REVIEW DOCUMENTS PRODUCED BY DEBTORS (4.9); STRATEGIZE WITH M. SCHAEDLE REGARDING REVIEW (.5); DETAILED EMAIL TO CASE TEAM REGARDING REVIEW (.6)	MINTZ, JOSEF	017	6.00	3,420.00
09/24/19	DISCUSS BECHTEL INVESTIGATION MATTERS WITH J. MINTZ AND REVIEW RELATED EMAIL REPORTS	SCHAEDLE, MICHAEL	017	1.00	810.00

COMMITTE	CONSTRUCTION, L.P. UNSECURED CREDITORS EE BER: 154278-01600			INVOIC	NUMBER: 13 E NO. 1856966 MBER 14, 2019
DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
09/25/19	REVIEW TIME LINE MEMO AND RELATED MATERIAL	SCHAEDLE, MICHAEL	017	1.50	1,215.00
09/25/19	REVIEW BECHTEL INVESTIGATION PRODUCTION	SCHAEDLE, MICHAEL	017	1.80	1,458.00
09/26/19	NOTE TO M. KASLOW REGARDING TIME LINE MEMO REVISION AND POSSIBLE ADDITIONAL DISCOVERY	SCHAEDLE, MICHAEL	017	0.20	162.00
09/26/19	DISCUSS BECHTEL INVESTIGATION PRODUCTION WITH S. TARR	SCHAEDLE, MICHAEL	017	0.60	486.00
09/26/19	ADDITIONAL REVIEW OF TIME LINE MEMO AND DOCUMENTS FROM BECHTEL INVESTIGATION PRODUCTION	SCHAEDLE, MICHAEL	017	2.90	2,349.00
09/27/19	DRAFT AND SENT NOTE TO S. TARR RE COMMITTEE INVESTIGATION ISSUES AND DEBTOR ORGANIZATIONAL DOCUMENTS.	BIBILONI, JOSE	017	0.40	168.00
09/27/19	REVIEW M. SCHAEDLE AND J. MINTZ EMAILS REGARDING INVESTIGATION OF COMPANY AND BEGIN UPDATING MEMORANDUM REGARDING THE SAME	KASLOW, MATTHEW	017	0.30	132.00
09/27/19	CALL WITH R. POPPITI AND M. NEIBURG REGARDING PRIV LOG (.4); EMAILS WITH J. LUCIAN REGARDING SAME (.2)	MINTZ, JOSEF	017	0.60	342.00
09/27/19	STRATEGIZE REGARDING BECHTEL ISSUES WITH J. LUCIAN	SCHAEDLE, MICHAEL	017	0.50	405.00
09/27/19	ADDITIONAL REVIEW OF DOCUMENTS REGARDING BECHTEL ISSUES	SCHAEDLE, MICHAEL	017	1.50	1,215.00
09/28/19	CONTINUE UPDATING MEMORANDUM REGARDING INVESTIGATION OF COMPANY	KASLOW, MATTHEW	017	4.30	1,892.00
09/28/19	REVIEW DEBTORS PRIV LOG (.3); EMAIL TO CASE TEAM REGARDING SAME (.2)	MINTZ, JOSEF	017	0.50	285.00
09/29/19	CONTINUE UPDATING MEMORANDUM REGARDING INVESTIGATION OF COMPANY	KASLOW, MATTHEW	017	0.80	352.00
09/30/19	CONTINUE UPDATING MEMORANDUM REGARDING INVESTIGATION OF COMPANY AND REVISE THE SAME	KASLOW, MATTHEW	017	2.00	880.00

COMMITT	CONSTRUCTION, L.P. UNSECURED CREDITORS EE BER: 154278-01600			INVOIC	E NUMBER: 14 E NO. 1856966 MBER 14, 2019
DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
09/30/19	REVIEW PRIVILEGE LOG AND NOTE TO WORKING GROUP REGARDING SAME	SCHAEDLE, MICHAEL	017	0.20	162.00
	017 INVESTIGATION OF COMPANY			61.30	33,505.00
TASK: 019	LITIGATION				
09/03/19	ATTENTION TO CERTIFICATION OF COUNSEL FILED IN PRIME NDT ADVERSARY RE APPOINTMENT OF A MEDIATOR.	BIBILONI, JOSE	019	0.20	84.00
09/06/19	REVIEW UNOPPOSED MOTION TO EXTEND DEADLINE TO REMOVE CIVIL ACTIONS FILED BY COLUMBIA GAS.	BIBILONI, JOSE	019	0.10	42.00
09/11/19	REVIEW NOTES ON PRIME NDT PAYMENT FROM YCST AND OUST	SCHAEDLE, MICHAEL	019	0.20	162.00
09/17/19	ATTENTION TO PENDING LITIGATION MATTERS	LUCIAN, JOHN	019	0.40	286.00
	019 LITIGATION			0.90	574.00
TASK: 021	OMNIBUS COURT HEARING - PREPARATION/	ATTENDANCE			
09/19/19	REVIEW AGENDA FOR SEPTEMBER 23 OMNIBUS HEARING.	BIBILONI, JOSE	021	0.10	42.00
	021 OMNIBUS COURT HEARING - PREPARAT	TION/ ATTENDANCE		0.10	42.00
TASK: 022	PLAN AND DISCLOSURE STATEMENT				
09/05/19	ATTENTION TO PLAN EXCLUSIVITY	LUCIAN, JOHN	022	0.20	143.00
09/09/19	ATTENTION TO MOTIONS TO EXTEND PLAN EXCLUSIVE PERIODS AND TIME TO REMOVE CIVIL ACTIONS.	BIBILONI, JOSE	022	0.10	42.00
09/09/19	REVIEW J. BIBILONI RESEARCH ON PLAN RELATED MATTERS	MINTZ, JOSEF	022	2.00	1,140.00
09/10/19	ATTENTION TO MOTION TO EXTEND EXCLUSIVE PERIODS FOR PLAN FILING/SOLICITATION AND MOTION TO EXTEND TIME TO REMOVE CIVIL ACTIONS FILED BY WELDED.	BIBILONI, JOSE	022	0.30	126.00
09/10/19	FURTHER RESEARCH RELATING TO PLAN AND RELATED ISSUES (2.5); STRATEGIZE WITH M. SCHAEDLE REGARDING SAME (.3)	MINTZ, JOSEF	022	2.80	1,596.00
09/12/19	PREPARE FOR (.3) AND ATTEND CALL WITH TENEO REGARDING PREFERENCE ANALYSIS AND MECHANICS LIEN ISSUES UNDER PLAN (.5)	MINTZ, JOSEF	022	0.80	456.00

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DATEDESCRIPTIONTIMFKEEPERCODEHOURSAM09/13/19EMAILS WITH O. STEVENS REGARDING DISCUSSIONS WITH ALIX AND OTHER STRATEGIC CONSIDERATIONS ON PLAN (2), REVIEW TRANSFEREE ANALYSIS (2)MINIZ, JOSEF0220.7009/13/19SIRATEGIZ WITH M. SCHAEDLE, J. LUCIAN AND JBILON REGARDING AVOIDANCE ACTIONS AND PLAN RELATED ISUES (5), FOLLOW UP WITH M. SCHAEDLE, SCHAEDING SAME (5)MINIZ, JOSEF0221.0009/13/19DISCUSS EXCLUSIVITY WITH J. LUCIAN NORKING GROUP MEETING ON BECHTEL INVESTIGATION AND PLAN REFARE FOR MEETING WITH BR WORKING GROUP ON BECHTEL MICHAEL0220.2009/13/19PREPARE FOR MEETING WITH BR WORKING GROUP ON BECHTEL MICHAEL0220.5009/13/19PREPARE FOR MEETING WITH BR WORKING GROUP MEETING ON BECHTEL INVESTIGATION MICHAEL0220.5009/13/19PARTICIPATE IN BR WORKING GROUP MEETING ON BECHTEL INVESTIGATION AND PLAN ISSUESSCHAEDLE, MICHAEL0220.5009/13/19REVIEW DEBTORS MOTION TO EXTEND EXCLUSIVE PRODE IN CONNECTION MICHAEL0220.702009/13/19REVIEW CIVIL ACTIONS (4) EDRIFT MICHAEL0220.200.7009/13/19REVIEW TOR REVIEW CIVIL ACTIONS (4) EDRIFT MICHAEL0220.200.7009/17/19REVIEW FEROLES FOR STATEMENT MICHAEL560509/17/19REVIEW EXCLUSIVITY MOTION REVIEW EXCLUSIVER FOR STATEMENT AND ULATION AD ADADQUATE PROTECTION MICHAEL0240.7009/17/19REVIEW EXCLUSIVERY MOTION AD SCHAEDLE AND J LUCIAN AD ADADQUATE PROTECTION <br< th=""><th>COMMITT</th><th>CONSTRUCTION, L.P. UNSECURED CREDITORS TEE BER: 154278-01600</th><th></th><th></th><th>INVOIC</th><th>E NUMBER: 15 CE NO. 1856966 MBER 14, 2019</th></br<>	COMMITT	CONSTRUCTION, L.P. UNSECURED CREDITORS TEE BER: 154278-01600			INVOIC	E NUMBER: 15 CE NO. 1856966 MBER 14, 2019
DISCUSSIONS WITH ALIX AND OTHER STRATEGIC CONSIDERATIONS ON PLAN (2), REVIEW TRANSFERE ANALYSIS (2)09/13/19STRATEGIZE WITH M. SCHAEDLE, J. LUCIAN AND J. BIBLIONI REGARDING AVOIDANCE ACTIONS AND PLAN RELATED ISSUES (3), FOLLOW UP WITH M. SCHAEDLE AND J. LUCIAN REGARDING SAME (3)MINTZ, JOSEF0220.1009/13/19DISCUSS EXCLUSIVITY WITH J. LUCIAN REARDLE AND J. LUCIAN REGARDING SAME (3)SCHAEDLE, MICITAEL0220.1009/13/19PREPARE FOR MEETING WITH BR WORKING GROUP ON BECHTEL INVESTIGATION AND PLAN ISSUESSCHAEDLE, 	DATE	DESCRIPTION	TIMEKEEPER	CODE		AMOUNT
LUCIAN AND J. BIBILONI REGARDING AVOIDANCE. ACTIONS AND PLAN RELATED ISSUES (5.) FOLLOW UP WITH M. SCHAEDLE AND J. LUCIAN REGARDING SAME (5.)SCHAEDLE, MICHAEL0220.1009/13/19DISCUSS EXCLUSIVITY WITH J. LUCIAN WORKING GROUP ON BECHTEL INVESTIGATION AND PLAN ISSUESSCHAEDLE, MICHAEL0220.2009/13/19PREPARE FOR MEETING WITH BR WORKING GROUP ON BECHTEL INVESTIGATION AND PLAN ISSUESSCHAEDLE, MICHAEL0220.5009/13/19PARTICIPATE IN BR WORKING GROUP MEETING ON BECHTEL INVESTIGATION AND PLAN ISSUESSCHAEDLE, MICHAEL0220.5009/13/19REVIEW DEBTORS' MOTION TO EXTEND EXCLUSIVE PRIODS IN CONNECTION MICHAELBIBILONI, JOSE0220.7009/16/19REVIEW DEBTORS' MOTION TO EXTEND EXCLUSIVE PRIODS IN CONNECTION CHAPTER 11 PLAN AND MOTION TO EXTEND TIME TO REVIEW CIVIL ACTIONS (4); DRAFT SUMMARY OF SAME FOR J. LUCIAN AND M. SCHAEDLE (2); DISCUSS SAME WITH J. MINTZ (.1).SCHAEDLE, MICHAEL0220.2009/17/19REVIEW REQUEST FOR STAY RELIEF FROM HTH (.5); EMALT OM N. SCHAEDLE AND J. LUCIAN REGARDING SAME (2); REVIEW REQUEST FOR STAY RELIEF REGARDING SAME (2); REVIEW NEWMAN MOTION FOR RELIEF (4); EMAIL TO K. SCHAEDLE AND J. LUCIAN REGARDING SAME (2); REVIEW HTE REQUEST FOR STIPULATED REVIEW HER REGARDING SAME (2); REVIEW NEW HER REGARDING SAME (2); REVIEW REQUEST FOR STIPULATED REGARDING SAME (2); REVIEW RELIEF (4); EMAIL TO K. MILLER REGARDING SAME (2); REVIEW NEWMAN MOTION FOR RELIEF (5)0240.2009/23/19EAALS WITH E MILLER REGARDING HTE MINTZ, JOSEF0240.2009/23/19EAALS WITH E MILLER R	09/13/19	DISCUSSIONS WITH ALIX AND OTHER STRATEGIC CONSIDERATIONS ON PLAN (.2); REVIEW ALIX DELIVERABLE; (.3)	MINTZ, JOSEF	022	0.70	399.00
MICHAEL09/13/19PREPARE FOR MEETING WITH BR WORKING GROUP ON BECHTEL INVESTIGATION AND PLAN ISSUESSCHAEDLE, MICHAEL0220.2009/13/19PARTICIPATE IN BR WORKING GROUP MEETING ON BECHTEL INVESTIGATION AND PLAN ISSUESSCHAEDLE, MICHAEL0220.5009/16/19REVIEW DEBTORS' MOTION TO EXTEND 	09/13/19	LUCIAN AND J. BIBILONI REGARDING AVOIDANCE ACTIONS AND PLAN RELATED ISSUES (.5); FOLLOW UP WITH M. SCHAEDLE AND J. LUCIAN REGARDING	MINTZ, JOSEF	022	1.00	570.00
WORKING GROUP ON BECHTEL INVESTIGATION AND PLAN ISSUESMICHAEL09/13/19PARTICIPATE IN BR WORKING GROUP MEETING ON BECHTEL INVESTIGATION AND PLAN ISSUESSCHAEDLE, MICHAEL0220.5009/16/19REVIEW DEBTORS' MOTION TO EXTEND EXCLUSIVE PERIODS IN CONNECTION WITH FILING AND SOLICITATION OF CHAPTER I1 PLAN AND MOTION TO EXTEND TIME TO REVIEW CIVIL ACTIONS (4); DRAFT SUMMARY OF SAME FOR J. 	09/13/19	DISCUSS EXCLUSIVITY WITH J. LUCIAN	· · · · · · · · · · · · · · · · · · ·	022	0.10	81.00
MEETING ON BECHTEL INVESTIGATION AND PLAN ISSUESMICHAEL09/16/19REVIEW DEBTORS' MOTION TO EXTEND EXCLUSIVE PERIODS IN CONNECTION WITH FILING AND SOLICITATION OF EXCLUSIVE PERIODS IN CONNECTION WITH FILING AND SOLICITATION OF EXTEND TIME TO REVIEW CIVIL ACTIONS (.4); DRAFT SUMMARY OF SAME FOR J. LUCIAN AND M. SCHAEDLE (.2); DISCUSS SAME WITH J. MINTZ (.1).BIBILONI, JOSE0220.7009/17/19REVIEW EXCLUSIVITY MOTIONSCHAEDLE, MICHAEL0220.2009/17/19REVIEW REQUEST FOR STATEMENT9.60509/09/19REVIEW REQUEST FOR STAY RELIEF FROM HTE (.5); EMAIL TO M. SCHAEDLE AND J. LUCIAN REGARDING SAME (.2)MINTZ, JOSEF0240.7009/17/19REVIEW HTE REQUEST FOR STIPULATED STAY RELIEF (.4); EMAIL TO E. MILLER REGARDING SAME (.2); REVIEW NEWMAN MOTION FOR RELIEF (.5)MINTZ, JOSEF0240.2009/13/19EMAILS WITH E. MILLER REGARDING HTE STAY RELIEF FTIPULATIONMINTZ, JOSEF0240.20	09/13/19	WORKING GROUP ON BECHTEL	· · · · · · · · · · · · · · · · · · ·	022	0.20	162.00
EXCLUSIVE PERIODS IN CONNECTION WITH FILING AND SOLICITATION OF CHAPTER 11 PLAN AND MOTION TO EXTEND TIME TO REVIEW CIVIL ACTIONS (.4); DRAFT SUMMARY OF SAME FOR J. LUCIAN AND M. SCHAEDLE (.2); DISCUSS SAME WITH J. MINTZ (.1).SCHAEDLE, MICHAEL0220.2009/17/19REVIEW EXCLUSIVITY MOTIONSCHAEDLE, MICHAEL0220.20022 PLAN AND DISCLOSURE STATEMENT9.605O424 RELIEF FROM STAY AND ADEQUATE PROTECTION09/09/19REVIEW REQUEST FOR STAY RELIEF FROM HTE (.5); EMAIL TO M. SCHAEDLE AND J. LUCIAN REGARDING SAME (.2)MINTZ, JOSEF0240.7009/17/19REVIEW HTE REQUEST FOR STIPULATED STAY RELIEF (.4); EMAIL TO E. MILLER REGARDING SAME (.2); REVIEW NEWMAN MOTION FOR RELIEF (.5)MINTZ, JOSEF0240.2009/23/19EMAILS WITH E. MILLER REGARDING HTE STAY RELIEF STIPULATIONMINTZ, JOSEF0240.20	09/13/19	MEETING ON BECHTEL INVESTIGATION		022	0.50	405.00
MICHAEL 922 PLAN AND DISCLOSURE STATEMENT 96.0 5 TASK: 024 ELIEF FROM STAY AND ADEQUATE PROTECTION 09/09/19 REVIEW REQUEST FOR STAY RELIEF ROM HTE (.5); EMAIL TO M. SCHAEDLE AND J. LUCIAN REGARDING SAME (.2) 09/17/19 REVIEW HTE REQUEST FOR STIPULATED NINTZ, JOSEF 024 1.10 VINTZ, JOSEF 024 1.10 09/23/19 EMAILS WITH E. MILLER REGARDING HTE MINTZ, JOSEF 024 0.20 VINTZ, JOSEF 024 0.20	09/16/19	EXCLUSIVE PERIODS IN CONNECTION WITH FILING AND SOLICITATION OF CHAPTER 11 PLAN AND MOTION TO EXTEND TIME TO REVIEW CIVIL ACTIONS (.4); DRAFT SUMMARY OF SAME FOR J. LUCIAN AND M. SCHAEDLE (.2); DISCUSS	BIBILONI, JOSE	022	0.70	294.00
TASK: 024 RELIEF FROM STAY AND ADEQUATE PROTECTION09/09/19REVIEW REQUEST FOR STAY RELIEF FROM HTE (.5); EMAIL TO M. SCHAEDLE AND J. LUCIAN REGARDING SAME (.2)MINTZ, JOSEF0240.7009/17/19REVIEW HTE REQUEST FOR STIPULATED STAY RELIEF (.4); EMAIL TO E. MILLER REGARDING SAME (.2); REVIEW NEWMAN MOTION FOR RELIEF (.5)MINTZ, JOSEF0241.1009/23/19EMAILS WITH E. MILLER REGARDING HTE STAY RELIEF STIPULATIONMINTZ, JOSEF0240.20	09/17/19	REVIEW EXCLUSIVITY MOTION		022	0.20	162.00
09/09/19REVIEW REQUEST FOR STAY RELIEF FROM HTE (.5); EMAIL TO M. SCHAEDLE AND J. LUCIAN REGARDING SAME (.2)MINTZ, JOSEF0240.7009/17/19REVIEW HTE REQUEST FOR STIPULATED STAY RELIEF (.4); EMAIL TO E. MILLER REGARDING SAME (.2); REVIEW NEWMAN MOTION FOR RELIEF (.5)MINTZ, JOSEF0241.1009/23/19EMAILS WITH E. MILLER REGARDING HTE STAY RELIEF STIPULATIONMINTZ, JOSEF0240.20		022 PLAN AND DISCLOSURE STATEMENT			9.60	5,576.00
FROM HTE (.5); EMAIL TO M. SCHAEDLE   AND J. LUCIAN REGARDING SAME (.2)   09/17/19 REVIEW HTE REQUEST FOR STIPULATED MINTZ, JOSEF 024 1.10   STAY RELIEF (.4); EMAIL TO E. MILLER REGARDING SAME (.2); REVIEW NEWMAN MOTION FOR RELIEF (.5) 024 0.20   09/23/19 EMAILS WITH E. MILLER REGARDING HTE MINTZ, JOSEF 024 0.20	TASK: 024	RELIEF FROM STAY AND ADEQUATE PROTEC	TION			
STAY RELIEF (.4); EMAIL TO E. MILLER REGARDING SAME (.2); REVIEW NEWMAN MOTION FOR RELIEF (.5) 09/23/19 EMAILS WITH E. MILLER REGARDING HTE MINTZ, JOSEF 024 0.20 STAY RELIEF STIPULATION	09/09/19	FROM HTE (.5); EMAIL TO M. SCHAEDLE	MINTZ, JOSEF	024	0.70	399.00
STAY RELIEF STIPULATION	09/17/19	STAY RELIEF (.4); EMAIL TO E. MILLER REGARDING SAME (.2); REVIEW NEWMAN	MINTZ, JOSEF	024	1.10	627.00
024 RELIEF FROM STAY AND ADEQUATE PROTECTION 2.00 1	09/23/19		MINTZ, JOSEF	024	0.20	114.00
		024 RELIEF FROM STAY AND ADEQUATE PR	OTECTION		2.00	1,140.00
TOTAL SERVICES\$69		TOTAL SERVICES			\$	69,316.50

PENNSYLVANIA NEW YORK NEW JERSEY DELAWARE WASHINGTON, DC FLORIDA CALIFORNIA OHIO TEXAS ILLINOIS SHANGHAI

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS COMMITTEE FILE NUMBER: 154278-01600 PAGE NUMBER: 16 INVOICE NO. 1856966 NOVEMBER 14, 2019

#### FOR DISBURSEMENTS ADVANCED THROUGH SEPTEMBER 30, 2019

DATE	DESCRIPTION	AMOUNT
09/02/2019	WESTLAW	42.84
09/03/2019	MILEAGE: JOHN LUCIAN HEARING AUGUST 22, 2019 - DELAWARE - MILEAGE ON 09/03/19	29.00
09/03/2019	PARKING: JOHN LUCIAN HEARING AUGUST 22, 2019 - DELAWARE - PARKING WILMINGTON ON 09/03/19	11.00
09/03/2019	TOLL: JOHN LUCIAN HEARING AUGUST 22, 2019 - DELAWARE - TOLLS ON 09/03/19 (PHILDELPHIA/WILMINGTON)	5.00
09/03/2019	WESTLAW	30.03
09/10/2019	WESTLAW WESTLAW MINTZ, JOSEF W	244.44
09/11/2019	WESTLAW BIBILONI,JOSE	132.93
09/13/2019	WESTLAW BIBILONI,JOSE	60.06
09/18/2019	LEXISMINTZ, JOSEF/ACCESS CHARGE	71.28
09/18/2019	LEXISMINTZ, JOSEF/DOC ACCESS	228.55
09/30/2019	WESTLAW LEWIS, CHRISTOPHER A	2,758.98
	DOCKET SEARCHES	71.80
	REPRODUCTION OF DOCUMENTS	101.80
	TOTAL DISBURSEMENTS	\$ 3,787.71
CURRENT	INVOICE TOTAL	\$ 73,104.21

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TIMEKEEPER	RATE	HOURS	FEES
CHRISTOPHER A. LEWIS	335.00	8.40	2,814.00
FREDERICK G. SANDSTROM	610.00	1.00	610.00
JOHN E. LUCIAN	715.00	4.00	2,860.00
JOSE F. BIBILONI	420.00	23.30	9,786.00
JOSEF W. MINTZ	570.00	35.80	20,406.00
MATTHEW E. KASLOW	440.00	17.30	7,612.00
MICHAEL B. SCHAEDLE	810.00	21.80	17,658.00
MICHAEL MATTHEWS	270.00	1.80	486.00
PHILIP M. GUFFY	465.00	5.30	2,464.50
STANLEY B. TARR	660.00	7.00	4,620.00
TOTALS		125.70	\$ 69,316.50

# EXHIBIT E

### SUMMARY AND DETAILS OF EXPENSE REIMBURSEMENT REQUESTED, BY CATEGORY (SEPTEMBER 1, 2019 THROUGH SEPTEMBER 30, 2019)

Expense Category	Service Provider	TOTAL EXPENSES	
Reproduction of Documents	In-house / Parcels, Inc.	\$101.80	
Mileage, Parking and Tolls		\$45.00	
Docket Searches	PACER	\$71.80	
Legal Research	Lexis / Westlaw	\$3,569.11	
TOTAL:		\$3,787.71	

#### **CERTIFICATE OF SERVICE**

I, Jose F. Bibiloni hereby certify that on November 14, 2019, I served or caused to be served the foregoing *Eleventh 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 September 1, 2019 through September 30, 2019*, including notice thereof, upon the following persons via U.S. first-class mail, postage fully prepaid:

WELDED CONSTRUCTION, L.P. ET AL. Attn: Frank A. Pometti, Chief Restructuring Officer 26933 Eckel Road Perrysburg, Ohio 43551

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 YOUNG CONAWAY STARGATT & TAYLOR, LLP Attn: Tara C. Pakrouh, Esq. Rodney Square 1000 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

<u>/s/ Jose F. Bibiloni</u> Jose F. Bibiloni (DE No. 6261)