

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
WELDED CONSTRUCTION, L.P., <i>et al.</i> , ¹)	Case No. 18-12378 (CSS)
Debtors.)	(Jointly Administered)
)	Objection Deadline: February 18, 2020 at 4:00 p.m. (ET)

NOTICE OF TWELFTH 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 OCTOBER 1, 2019 THROUGH OCTOBER 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 January 29, 2020, the *Twelfth 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 October 1, 2019 through October 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 \$99,768.00 (80% of \$124,710.00) for professional services rendered and (ii) reimbursement of expenses incurred in the amount of \$864.95 as counsel to the Committee during the period from October 1, 2019 through and including October 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 **February 18, 2020 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.

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 P.O. Box 470, Perrysburg, OH 43552-0470.



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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 \$99,768.00 (80% of \$124,710.00) for services rendered to the Committee and reimbursement of \$864.95 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: January 29, 2020
Wilmington, Delaware

BLANK ROME LLP

/s/ Jose F. Bibiloni

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*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.*,¹

Debtors.

Chapter 11

Case No. 18-12378 (CSS)

(Jointly Administered)

Objection Deadline: February 18, 2020 at 4:00 p.m. (ET)

**SUMMARY COVER SHEET TO THE TWELFTH 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 OCTOBER 1, 2019 THROUGH OCTOBER 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:

October 1, 2019 through October 31, 2019

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

\$99,768.00 (80% of \$124,710.00)

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

\$864.95

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:

\$1,583,212.75

Total expenses approved by interim order to date:

\$17,270.80

Total compensation and expenses paid to date:

\$1,600,483.55

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 P.O. Box 470, Perrysburg, OH 43552-0470.

Blended rate in this application for all attorneys: \$607.75

Blended rate in this application for all timekeepers: \$603.63

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: 12

Number of professionals in this application not included in staffing plan: 7

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): 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 0.60 hours and the corresponding compensation requested hereby is approximately \$252.00. 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:

Monthly Fee Application		Amounts Requested		Amounts Approved 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	\$58,220.00 (100%) D.I. 1148	\$934.36 (100%) D.I. 1148
11/12/2019 D.I. 1091	8/1/2019 – 8/31/2019 (Tenth Monthly)	\$60,904.50	\$384.19	\$60,904.50 (100%) D.I. 1148	\$384.19 (100%) D.I. 1148
11/14/2019 D.I. 1100	9/1/2019 – 9/30/2019 (Eleventh Monthly)	\$69,316.50	\$3,787.71	\$69,316.50 (100%) D.I. 1148	\$3,787.71 (100%) D.I. 1148

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Debtors.)	(Jointly Administered)
)	Objection Deadline: February 18, 2020 at 4:00 p.m. (ET)

**TWELFTH 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 OCTOBER 1, 2019 THROUGH OCTOBER 31, 2019**

This twelfth 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 October 1, 2019 through and including October 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.

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 P.O. Box 470, Perrysburg, OH 43552-0470.

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. On November 14, 2019, Blank Rome filed the *Fourth 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 July 1, 2019 Through September 30, 2019* [Docket No. 1104] (the “**Fourth Interim Fee Application**”). On

December 11, 2019, the Court entered an order [Docket No. 1148] approving the Fourth Interim Fee Application.

12. 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 \$1,600,483.55 by the Debtors in connection with Blank Rome's previous monthly and interim fee applications.

13. 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.

14. 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

15. 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**”):²

² 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

- (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.
- (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

16. 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.

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.

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

17. 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 \$124,710.00 and payment by the Debtors of 80% of this amount (\$99,768.00), and (b) the allowance and payment of 100% of its actual and necessary expenses incurred during the Application Period in the amount of \$864.95, all in accordance with the terms of the Administrative Order.

Summary of Fees

18. The total number of hours expended by Blank Rome professionals and paraprofessionals in performing professional services for the Committee during the Application Period was **206.60** hours at a blended billing rate of **\$603.63** per hour. The value of these services has been computed at the rates Blank Rome customarily charges for similar services provided to other clients.

19. 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.

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

(Task Code 001) Asset Sales / Disposition

Total Hours: 7.90 Total Fees: \$5,088.00

This category includes Blank Rome's review and analysis of the Debtors' real estate sale process, including analysis of the Debtors' sale motion, asset purchase agreement, and related papers.

(Task Code 003) Avoidance Action Analysis

Total Hours: 23.40 Total Fees: \$11,922.00

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: 2.50 Total Fees: \$908.00

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

(Task Code 007) Claims Administration and Objections

Total Hours: 11.40 Total Fees: \$7,497.00

This category includes Blank Rome's work in reviewing, analyzing, and researching issues related to the Debtors' claims objections.

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

Total Hours: 12.70 Total Fees: \$7,838.50

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: 27.70 Total Fees: \$17,720.00

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: 0.60 Total Fees: \$252.00

This category includes Blank Rome's work in connection with its fourth interim fee application and related papers.

(Task Code 014) Fee Applications – Others

Total Hours: 2.20 Total Fees: \$898.50

This category includes Blank Rome's work in connection with Teneo's tenth monthly fee application (August 2019), as well as the preparation of Teneo's eleventh monthly fee application (September 2019).

(Task Code 017) Investigation of Company

Total Hours: 64.20 Total Fees: \$39,097.00

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

(Task Code 019) Litigation

Total Hours: 31.50 Total Fees: \$18,153.00

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

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

Total Hours: 0.60 Total Fees: \$252.00

This category includes Blank Rome's work reviewing hearing agendas and communications with the Debtors in connection with same.

(Task Code 022) Plan and Disclosure Statement

Total Hours: 21.90 Total Fees: \$15,084.00

This category includes Blank Rome's work reviewing, analyzing, and researching issues in connection with the Debtors' chapter 11 plan and communications with the Debtors' advisors and Teneo relating to 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

21. Reimbursement of expenses in the amount of \$864.95 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**

22. 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).

23. 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

24. 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.

25. 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.

26. 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 \$99,768.00 (80% of \$124,710.00), together with the reimbursement of expenses incurred in the amount of \$864.95, and such other and further relief that the Court deems just, proper and necessary.

[Signature follows]

Dated: January 29, 2020
Wilmington, Delaware

BLANK ROME LLP

/s/ Jose F. Bibiloni

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*Counsel to the Official Committee of Unsecured
Creditors of Welded Construction, L.P., et al.*

EXHIBIT A**CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES
(OCTOBER 1, 2019 THROUGH OCTOBER 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.

CATEGORY OF TIMEKEEPER	BLENDED HOURLY RATES	
	NON-BANKRUPTCY ENGAGEMENTS ALL DOMESTIC OFFICES AS OF JANUARY 1, 2019¹	CURRENT APPLICATION PERIOD
Partner	\$790.00	\$733.18
Counsel	\$651.00	\$571.53
Associate	\$463.00	\$420.38
Paralegal	\$294.00	\$335.00
Aggregated:	\$637.00 (average)	\$603.63 (blended)

¹ 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
(OCTOBER 1, 2019 THROUGH OCTOBER 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	52.10	\$42,201.00	\$810.00	\$780.00	1	\$40,638.00
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	4.80	\$3,432.00	\$715.00	\$690.00	1	\$3,312.00
Frederick G. Sandstrom	Partner	Labor & Employment	Member of IL Bar since 2002; Member of DC Bar since 2005; Member of PA Bar since 2012	16.40	\$10,004.00	\$610.00	N/A	N/A	\$10,004.00
Stanley B. Tarr	Partner	Finance, Restructuring and Bankruptcy	Member of NY Bar since 2005; Member of PA and DE Bars since 2010	25.90	\$17,094.00	\$660.00	N/A	N/A	\$17,094.00
Josef W. Mintz	Of Counsel	Finance, Restructuring and Bankruptcy	Member of PA and NJ Bars since 2008; Member of DE Bar since 2011	44.70	\$25,479.00	\$570.00	\$535.00	1	\$23,914.50

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
Michael D. Silberfarb	Of Counsel	Commercial Litigation	Member of NY Bar since 2005; Member of PA Bar since 2014	2.40	\$1,440.00	\$600.00	N/A	N/A	\$1,440.00
Matthew E. Kaslow	Associate	Finance, Restructuring and Bankruptcy	Member of NJ Bar since 2015; Member of PA Bar since 2016	16.60	\$7,304.00	\$440.00	N/A	N/A	\$7,304.00
Jose F. Bibiloni	Associate	Finance, Restructuring and Bankruptcy	Member of DE Bar since 2016; Member of PA Bar since 2017	33.40	\$14,028.00	\$420.00	\$355.00	2	\$11,857.00
Philip M. Guffy	Associate	Finance, Restructuring and Bankruptcy	Member of NY Bar since 2016; Member of TX Bar since 2019	0.20	\$93.00	\$465.00	N/A	N/A	\$93.00
Adam J. Florek	Associate	General Litigation	Member of Illinois Bar since 2015; Member of New York Bar since 2018	7.10	\$2,662.50	\$375.00	N/A	N/A	\$2,662.50
Christopher A. Lewis	Paralegal	Finance, Restructuring and Bankruptcy	N/A	2.50	\$837.50	\$335.00	\$330.00	1	\$825.00
Michael Matthews	Practice Technology Project Manager		N/A	0.50	\$135.00	\$270.00	N/A	N/A	\$135.00
TOTALS:				206.60	\$124,710.00				\$119,279.00

EXHIBIT C**STAFFING PLAN FOR BLANK ROME LLP
FOR THE PERIOD OCTOBER 1, 2019 THROUGH OCTOBER 31, 2019****STAFFING PLAN:**

CATEGORY OF TIMEKEEPER	NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER DURING THE APPLICABLE PERIOD¹	AVERAGE HOURLY RATE
Partners	2	\$762.50
Counsel	1	\$570.00
Associates	1	\$420.00
Paralegals	1	\$335.00

¹ 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 67% 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
(OCTOBER 1, 2019 THROUGH OCTOBER 31, 2019)**

TASK CODE	TASK DESCRIPTION	NUMBER OF HOURS	AMOUNT OF FEES
001	Asset Sales / Disposition	7.90	\$5,088.00
003	Avoidance Action Analysis	23.40	\$11,922.00
006	Case Administration (General)	2.50	\$908.00
007	Claims Administration and Objections	11.40	\$7,497.00
008	Creditors Committee	12.70	\$7,838.50
009	Employee Benefits and Pension	27.70	\$17,720.00
013	Fee Applications – Internal	0.60	\$252.00
014	Fee Applications – Others	2.20	\$898.50
017	Investigation of Company	64.20	\$39,097.00
019	Litigation	31.50	\$18,153.00
021	Omnibus Court Hearing	0.60	\$252.00
022	Plan and Disclosure Statement	21.90	\$15,084.00
TOTALS:		206.60	\$124,710.00

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: JANUARY 28, 2020
 MATTER NO. 154278-01600 04015
 INVOICE NO. 1869730

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

FOR LEGAL SERVICES RENDERED THROUGH OCTOBER 31, 2019

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
TASK: 001 ASSET SALES/DISPOSITION					
10/01/19	PREPARE REPORT ON: REAL ESTATE SALE, ETC	SCHAEDEL, MICHAEL	001	0.40	324.00
10/11/19	REVIEW APA AND NOTES TO AND FROM M. LUNN REGARDING SAME, INCLUDING COMMENT AND STATUS ISSUES	SCHAEDEL, MICHAEL	001	0.80	648.00
10/18/19	REVIEW REAL ESTATE PURCHASE AGREEMENT AND LEASE AND M. LUNN NOTE	SCHAEDEL, MICHAEL	001	0.30	243.00
10/21/19	REVIEW REAL ESTATE PURCHASE AGREEMENT AND LEASE ISSUES	SCHAEDEL, MICHAEL	001	0.50	405.00
10/22/19	REVIEW REPORT ON REAL ESTATE SALE FROM M. LUNN	SCHAEDEL, MICHAEL	001	0.20	162.00
10/23/19	REVIEW FINAL PURCHASE AGREEMENT ON REAL ESTATE SALE AND M. LUNN NOTE	SCHAEDEL, MICHAEL	001	0.30	243.00
10/24/19	REVIEW SALE MOTION (.5); REVIEW ASSET PURCHASE AGREEMENT (.3); EMAILS WITH M. SCHAEDEL REGARDING SAME (.2)	MINTZ, JOSEF	001	1.00	570.00
10/24/19	NOTES TO AND FROM J. MINTZ AND A. MIELKE ON HQ SALE AND RELATED PAPERS	SCHAEDEL, MICHAEL	001	0.20	162.00
10/25/19	EMAILS REGARDING APA FOR HQ REAL ESTATE	MINTZ, JOSEF	001	0.30	171.00

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
10/25/19	REVIEW SALE MOTION AND ORDER AND NOTES TO AND FROM A. MIELKE AND M. LUNN REGARDING SAME	SCHAEDELE, MICHAEL	001	0.40	324.00
10/28/19	COMMUNICATIONS WITH M. SCHAEDELE AND J. MINTZ RE REVIEW OF WELDED MOTION TO SELL HEADQUARTERS (.2); REVIEW AND SUMMARIZE SAME (1.4); FURTHER EMAILS WITH J. MINTZ RE SAME (.1).	BIBILONI, JOSE	001	1.70	714.00
10/28/19	REVIEW SALE MOTION AND APA (.7); REVISE DRAFT SUMMARY TO COMMITTEE REGARDING SAME AND EMAIL COMMITTEE (.7)	MINTZ, JOSEF	001	1.40	798.00
10/28/19	NOTES TO AND FROM J. MINTZ ON HQ SALE	SCHAEDELE, MICHAEL	001	0.20	162.00
10/29/19	REVIEW AND COMMENT ON MICHELS LEASE AND NOTE TO AND FROM M. LUNN ON SALE ISSUES	SCHAEDELE, MICHAEL	001	0.20	162.00
001 ASSET SALES/DISPOSITION				7.90	5,088.00

TASK: 003 AVOIDANCE ACTION ANALYSIS

10/03/19	CALLS WITH J. MINTZ RE INFORMATION NEEDED IN CONNECTION WITH PREFERENCE CLAIM ANALYSIS (.3); EMAILS WITH B. FELDMAN (YCST) RE SAME (.1).	BIBILONI, JOSE	003	0.40	168.00
10/03/19	NOTE TO AND FROM J. MINTZ AND S. TARR REGARDING PREFERENCE ANALYSIS	SCHAEDELE, MICHAEL	003	0.20	162.00
10/07/19	EMAILS WITH O. STEVENS RE ANALYSIS OF PREFERENCE ISSUES	BIBILONI, JOSE	003	0.10	42.00
10/08/19	DISCUSS FURTHER PREFERENCE/MECHANIC'S LIEN RESEARCH NEEDED WITH J. MINTZ.	BIBILONI, JOSE	003	0.20	84.00
10/09/19	EMAILS WITH J. MINTZ AND TENEO TEAM RE PREFERENCE ANALYSIS ISSUES.	BIBILONI, JOSE	003	0.10	42.00
10/09/19	REVIEW MATERIALS PROVIDED FOR PREFERENCE ANALYSIS (.6); EMAIL TO B. FELDMAN REGARDING SAME (.2); EMAILS WITH O. STEVENS REGARDING SAME (.2)	MINTZ, JOSEF	003	1.00	570.00
10/10/19	DISCUSS PREFERENCE RESEARCH NEEDED WITH J. MINTZ (.3); INITIAL RESEARCH REGARDING PREFERENCE ISSUES (.2).	BIBILONI, JOSE	003	0.50	210.00

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
10/10/19	REVIEW DOCUMENTS (.5); CALL WITH O. STEPHENS REGARDING PREFERENCE ANALYSIS (.7)	MINTZ, JOSEF	003	1.20	684.00
10/11/19	RESEARCH PREFERENCE CLAIM ISSUES/DEFENSES AND DRAFT SUMMARY OF LAW RE SAME FOR J. MINTZ.	BIBILONI, JOSE	003	4.80	2,016.00
10/14/19	RESEARCH PREFERENTIAL TRANSFER ISSUES PER J. MINTZ REQUEST.	BIBILONI, JOSE	003	0.70	294.00
10/14/19	REVIEW RESEARCH MATERIALS RELATING TO PREFERENCE ANALYSIS	MINTZ, JOSEF	003	2.00	1,140.00
10/15/19	FURTHER RESEARCH PREFERENCE CLAIM AND DEFENSE ISSUES AND DISCUSS SAME WITH J. MINTZ.	BIBILONI, JOSE	003	3.90	1,638.00
10/15/19	CALL WITH B. FELDMAN REGARDING ADDITIONAL INFORMATION NEEDED ON PREFERENCE ANALYSIS (1.2); REVIEW DOCUMENTS (1.2)	MINTZ, JOSEF	003	1.40	798.00
10/15/19	DISCUSS PREFERENCE ISSUES WITH J. MINTZ	SCHAEDLE, MICHAEL	003	0.40	324.00
10/16/19	FURTHER RESEARCH PREFERENCE CLAIM AND DEFENSE ISSUES (1.0); EMAILS WITH J. MINTZ AND TENEO TEAM RE SAME (.2).	BIBILONI, JOSE	003	1.20	504.00
10/16/19	REVIEW DOCUMENTS FOR PREFERENCE ANALYSIS (1.0); UPDATE TO TENEO REGARDING SAME (.6)	MINTZ, JOSEF	003	1.60	912.00
10/17/19	FURTHER RESEARCH PREFERENCE CLAIM AND DEFENSE ISSUES AND DISCUSS WITH J. MINTZ (.3); CALL WITH J. MINTZ AND TENEO TEAM RE ANALYSIS RELATED TO SAME, DEBRIEF WITH J. MINTZ FOLLOWING CALL (1.0).	BIBILONI, JOSE	003	1.30	546.00
10/21/19	EMAILS WITH TENEO TEAM AND J. MINTZ RE CLAIMS POOL ANALYSIS AND ADDITIONAL PREFERENCE CLAIM ANALYSIS.	BIBILONI, JOSE	003	0.20	84.00
10/22/19	COMMUNICATIONS WITH J. MINTZ AND TENEO TEAM RE PREFERENCE ANALYSIS ISSUES.	BIBILONI, JOSE	003	0.20	84.00
10/22/19	DISCUSS PREFERENCES AND RELATED ISSUES WITH TENEO TEAM AND J. MINTZ	SCHAEDLE, MICHAEL	003	0.70	567.00

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
10/23/19	DISCUSS PREFERENCES AND RELATED ISSUES WITH J. MINTZ	SCHAEDLE, MICHAEL	003	0.50	405.00
10/28/19	NOTES TO AND FROM J. MINTZ ON PREFERENCE ISSUES	SCHAEDLE, MICHAEL	003	0.50	405.00
10/29/19	DISCUSS PREFERENCE ISSUES WITH TENEO TEAM AND J. MINTZ	SCHAEDLE, MICHAEL	003	0.30	243.00
003 AVOIDANCE ACTION ANALYSIS				23.40	11,922.00
TASK: 006 CASE ADMINISTRATION (GENERAL)					
10/03/19	REVIEW DOCKETS AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.80	268.00
10/10/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.60	201.00
10/15/19	EMAILS AND CALL TO A. MIELKE REGARDING OPEN ISSUES	MINTZ, JOSEF	006	0.30	171.00
10/25/19	REVIEW DOCKET AND UPDATE CASE CALENDAR	LEWIS, CHRISTOPHER	006	0.80	268.00
006 CASE ADMINISTRATION (GENERAL)				2.50	908.00
TASK: 007 CLAIMS ADMINISTRATION AND OBJECTIONS					
10/21/19	RESEARCH ISSUE REGARDING CLAIM OBJECTION AND DISCUSS WITH J. MINTZ	TARR, STANLEY	007	2.30	1,518.00
10/22/19	DRAFT EXECUTIVE SUMMARY FOR COMMITTEE MEMO	TARR, STANLEY	007	1.30	858.00
10/23/19	CONTINUE RESEARCH REGARDING MEMO	TARR, STANLEY	007	1.00	660.00
10/25/19	REVIEW AND REVISE MEMO	TARR, STANLEY	007	2.00	1,320.00
10/28/19	ATTEND TEAM CALL; RESEARCH ISSUE AND EMAIL TEAM	TARR, STANLEY	007	4.50	2,970.00
10/31/19	COORDINATE COVERAGE FOR OMNIBUS HEARING ON CLAIMS OBJECTIONS WITH S. TARR	MINTZ, JOSEF	007	0.30	171.00
007 CLAIMS ADMINISTRATION AND OBJECTIONS				11.40	7,497.00
TASK: 008 CREDITORS COMMITTEE (INTERNAL/COMMUNICATION W/CREDITC					
10/02/19	CALL WITH J. MINTZ RE COORDINATION OF COMMITTEE CALL AND AGENDA RELATED TO SAME.	BIBILONI, JOSE	008	0.10	42.00
10/02/19	ATTENTION TO UCC MATTERS	LUCIAN, JOHN	008	0.20	143.00

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
10/07/19	ATTEND CALL WITH M. SCHAEDELE AND S. TARR REGARDING OPEN ISSUES IN CASE	MINTZ, JOSEF	008	1.00	570.00
10/14/19	ASSESS VOICEMAIL FROM CREDITOR REGARDING INSURANCE ISSUES.	BIBILONI, JOSE	008	0.10	42.00
10/14/19	ATTENTION TO COMMITTEE MATTERS	LUCIAN, JOHN	008	0.20	143.00
10/15/19	CALLS AND EMAILS WITH CREDITOR RE CLAIMS ISSUES.	BIBILONI, JOSE	008	0.30	126.00
10/23/19	COORDINATE COMMITTEE CALL WITH J. MINTZ AND TENEO TEAM.	BIBILONI, JOSE	008	0.20	84.00
10/28/19	COORDINATE COMMITTEE UPDATE CALL WITH BLANK ROME TEAM.	BIBILONI, JOSE	008	0.10	42.00
10/29/19	COORDINATE COMMITTEE UPDATE CALL AND COMMUNICATIONS WITH COMMITTEE MEMBERS RE SAME.	BIBILONI, JOSE	008	0.30	126.00
10/29/19	CALL WITH YOUNG CONAWAY TENEO AND ALIX TEAMS ON PROFESSIONALS UPDATE AND NEGOTIATING SESSION REGARDING PLAN	MINTZ, JOSEF	008	1.50	855.00
10/30/19	ATTENTION TO UCC MATTERS	LUCIAN, JOHN	008	0.40	286.00
10/31/19	COMMUNICATIONS WITH BLANK ROME TEAM IN PREPARATION FOR COMMITTEE CALL (.2); PREPARE FOR AND PARTICIPATE IN COMMITTEE UPDATE CALL (1.6).	BIBILONI, JOSE	008	1.80	756.00
10/31/19	CALL/EMAILS WITH CHUBB RE: UCC MATTERS	LUCIAN, JOHN	008	0.40	286.00
10/31/19	PREPARE FOR AND PARTICIPATE IN UCC CALL	LUCIAN, JOHN	008	1.30	929.50
10/31/19	DRAFT AND SEND AGENDA AND UPDATE TO COMMITTEE REGARDING TODAY'S CALL	MINTZ, JOSEF	008	0.50	285.00
10/31/19	PREPARE FOR (.3) AND ATTEND COMMITTEE CALL (1.2)	MINTZ, JOSEF	008	1.50	855.00
10/31/19	DISCUSS TENEO DECK FOR COMMITTEE CALL WITH TENEO TEAM AND J. MINTZ	SCHAEDELE, MICHAEL	008	0.30	243.00
10/31/19	REVIEW TENEO DECK FOR COMMITTEE CALL	SCHAEDELE, MICHAEL	008	0.30	243.00

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
10/31/19	PREPARE FOR COMMITTEE CALL	SCHAEDLE, MICHAEL	008	0.70	567.00
10/31/19	PARTICIPATE IN COMMITTEE CALL	SCHAEDLE, MICHAEL	008	1.50	1,215.00
	008 CREDITORS COMMITTEE (INTERNAL/COMMUNICATION W/CREI			12.70	7,838.50
TASK: 009 EMPLOYEE BENEFITS AND PENSION					
10/02/19	DISCUSS CENTRAL STATES ISSUES WITH S. TARR	SCHAEDLE, MICHAEL	009	0.20	162.00
10/03/19	ANALYZE WITHDRAWAL LIABILITY CLAIM ISSUE FOR M. SCHAEDEL	SANDSTROM, FREDERICK	009	0.30	183.00
10/03/19	NOTE TO AND FROM J. MINTZ, S. TARR AND G. SANDSTROM REGARDING CENTRAL STATES ISSUES	SCHAEDLE, MICHAEL	009	0.30	243.00
10/07/19	CALLS WITH G. SANDSTROM AND S. TARR REGARDING CENTRAL STATES	MINTZ, JOSEF	009	0.50	285.00
10/07/19	CORRESPONDENCE AND ASSOCIATED TELEPHONE CONFERENCE WITH J. MINTZ AND S. TARR REGARDING ANALYSIS OF WITHDRAWAL LIABILITY ISSUE	SANDSTROM, FREDERICK	009	0.40	244.00
10/07/19	INITIAL DRAFTING OF MEMORANDUM ANALYZING WITHDRAWAL LIABILITY ISSUE	SANDSTROM, FREDERICK	009	1.30	793.00
10/07/19	STATUS CALL TO DISCUSS OPEN ISSUES (1.0); RESEARCH ISSUE AND EMAIL MEMO TO M. SCHAEDEL, J. MINTZ (1.2); CONFERENCE REGARDING WITHDRAWAL LIABILITY CLAIM AND STUDY SAME (1.3)	TARR, STANLEY	009	3.50	2,310.00
10/08/19	CONTINUED DRAFTING OF MEMORANDUM ANALYZING WITHDRAWAL LIABILITY ISSUE	SANDSTROM, FREDERICK	009	1.10	671.00
10/09/19	CONTINUED DRAFTING OF MEMORANDUM ANALYZING WITHDRAWAL LIABILITY ISSUE	SANDSTROM, FREDERICK	009	4.10	2,501.00
10/10/19	REVIEW DRAFT MEMORANDUM ON WITHDRAWAL LIABILITY	MINTZ, JOSEF	009	0.40	228.00
10/10/19	DRAFT COMPREHENSIVE MEMORANDUM ANALYZING ERISA WITHDRAWAL LIABILITY ISSUE	SANDSTROM, FREDERICK	009	4.50	2,745.00

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
10/15/19	REVIEW AND COMMENT ON DRAFT MEMORANDUM ON CENTRAL STATES CLAIM (1.7); EMAIL TO G. SANDSTROM REGARDING SAME (.2)	MINTZ, JOSEF	009	1.90	1,083.00
10/15/19	REVIEW J. MINTZ PROPOSED EDITS TO WITHDRAWAL LIABILITY ANALYSIS MEMORANDUM AND CORRESPOND WITH J. MINTZ REGARDING SAME	SANDSTROM, FREDERICK	009	0.30	183.00
10/15/19	DISCUSS CENTRAL STATES ISSUES WITH J. MINTZ	SCHAEDLE, MICHAEL	009	0.40	324.00
10/16/19	CALL WITH M. SCHAEDELE AND S. TARR REGARDING INVESTIGATION ISSUES AND CENTRAL STATES CLAIM	MINTZ, JOSEF	009	0.50	285.00
10/16/19	DISCUSS CENTRAL STATES AND BECHTEL ISSUES WITH J. MINTZ AND S. TARR	SCHAEDLE, MICHAEL	009	0.80	648.00
10/23/19	EMAILS REGARDING PENSION LIABILITY AND CENTRAL STATES CLAIM	MINTZ, JOSEF	009	0.50	285.00
10/23/19	TELEPHONE CONFERENCE WITH M. SCHAEDELE AND S. TARR REGARDING ADDITIONAL ANALYSIS OF WITHDRAWAL LIABILITY ISSUE	SANDSTROM, FREDERICK	009	0.40	244.00
10/23/19	ANALYZE PRIOR PARTIAL WITHDRAWAL LIABILITY SETTLEMENT AGREEMENT WITH CENTRAL STATES	SANDSTROM, FREDERICK	009	0.50	305.00
10/23/19	REVIEW CERTAIN PRODUCED MATERIALS COMMITTEE INVESTIGATION AND CENTRAL STATES ISSUES	SCHAEDLE, MICHAEL	009	0.30	243.00
10/23/19	DISCUSS CENTRAL STATES ISSUES WITH S. TARR AND G. SANDSTROM IN PART	SCHAEDLE, MICHAEL	009	0.50	405.00
10/24/19	UPDATE WITHDRAWAL LIABILITY ANALYSIS MEMO TO INCORPORATE ADDITIONAL ITEMS DISCUSSED WITH M. SCHAEDELE AND S. TARR	SANDSTROM, FREDERICK	009	0.40	244.00
10/25/19	UPDATE WITHDRAWAL LIABILITY ANALYSIS MEMORANDUM TO INCORPORATE ADDITIONAL ITEMS DISCUSSED WITH M. SCHAEDELE AND S. TARR	SANDSTROM, FREDERICK	009	3.10	1,891.00

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
10/25/19	NOTE TO AND FROM G. SANDSTROM REGARDING CENTRAL STATES CLAIM	SCHAEDLE, MICHAEL	009	0.20	162.00
10/25/19	DISCUSS CENTRAL STATES ISSUES WITH S. TARR	SCHAEDLE, MICHAEL	009	0.20	162.00
10/25/19	REVIEW G. SANDSTROM MEMO ON CENTRAL STATES CLAIM AND RELATED MATTER	SCHAEDLE, MICHAEL	009	0.60	486.00
10/28/19	REVIEW G. SANDSTROM MEMO ON CENTRAL STATES CLAIM	SCHAEDLE, MICHAEL	009	0.50	405.00
009 EMPLOYEE BENEFITS AND PENSION				27.70	17,720.00
TASK: 013 FEE APPLICATIONS - INTERNAL					
10/07/19	ATTENTION TO BLANK ROME INTERIM FEE APPLICATION AND ISSUES RELATED TO SAME.	BIBILONI, JOSE	013	0.30	126.00
10/15/19	DISCUSS BLANK ROME FEE APPLICATIONS WITH J. LUCIAN.	BIBILONI, JOSE	013	0.20	84.00
10/22/19	CONFER WITH J. LUCIAN RE BLANK ROME FEE APPLICATION MATTERS.	BIBILONI, JOSE	013	0.10	42.00
013 FEE APPLICATIONS - INTERNAL				0.60	252.00
TASK: 014 FEE APPLICATIONS - OTHERS (INCLUDES REVIEW AND OBJECTIONS					
10/22/19	DISCUSS CNO FOR TENEO TENTH MONTHLY (AUGUST 2019) FEE APPLICATION WITH C. LEWIS.	BIBILONI, JOSE	014	0.10	42.00
10/23/19	REVIEW AND REVISE CNO FOR TENEO TENTH MONTHLY FEE APPLICATION (AUGUST 2019) AND FILE SAME WITH COURT (.5); CONFER WITH C. LEWIS RE SAME (.1).	BIBILONI, JOSE	014	0.60	252.00
10/23/19	REVIEW DOCKET AND DRAFT CERTIFICATE OF NO OBJECTION REGARDING TENEO'S AUGUST 2019 FEE APPLICATION	LEWIS, CHRISTOPHER	014	0.30	100.50
10/25/19	DISCUSS FEE APPLICATION FILINGS WITH C. LEWIS AND PREPARE FOR SAME.	BIBILONI, JOSE	014	0.20	84.00

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
10/25/19	EMAILS WITH A. STEPANYANTS RE TENE SEPTMBER 2019 FEE APPLICATION AND CNO IN CONNECTION WITH AUGUST FEE APPLICATION (.2); INITIAL ATTENTION TO REVIEWING AND REVISING TENE SEPTMBER FEE APPLICATION (.5).	BIBILONI, JOSE	014	0.70	294.00
10/30/19	EMAILS WITH J. MINTZ RE ORDINARY COURSE PROFESSIONAL COMPENSATION NOTICE (.1); REVIEW SAME (.2).	BIBILONI, JOSE	014	0.30	126.00
014 FEE APPLICATIONS - OTHERS (INCLUDES REVIEW AND OBJECTI				2.20	898.50
TASK: 017 INVESTIGATION OF COMPANY					
10/01/19	FURTHER REVISE MEMORANDUM REGARDING COMMITTEE INVESTIGATION	KASLOW, MATTHEW	017	0.80	352.00
10/01/19	CONTINUE REVIEW OF COMMITTEE INVESTIGATION BINDER	SCHAEDLE, MICHAEL	017	1.10	891.00
10/02/19	FURTHER UPDATE MEMORANDUM REGARDING COMMITTEE INVESTIGATION	KASLOW, MATTHEW	017	0.60	264.00
10/03/19	REVIEW J. MINTZ COMMENTS TO INVESTIGATION TIMELINE AND RESPOND TO HIS EMAIL REGARDING THE SAME	KASLOW, MATTHEW	017	0.10	44.00
10/03/19	EMAILS WITH M. SCHAEDELE REGARDING PRIVILEGE LOG	MINTZ, JOSEF	017	0.30	171.00
10/03/19	REVIEW AND REVISE INVESTIGATION TIMELINE (1.5); EMAILS WITH M. KASLOW REGARDING SAME (.3)	MINTZ, JOSEF	017	1.80	1,026.00
10/03/19	NOTE TO J. LUCIAN ON WILLIAMS/BECHTEL	SCHAEDLE, MICHAEL	017	0.10	81.00
10/03/19	NOTE TO AND FROM J. MINTZ ON PRIVILEGE LOG (BECHTEL REVIEW)	SCHAEDLE, MICHAEL	017	0.20	162.00
10/07/19	COMMUNICATIONS WITH BLANK ROME TEAM RE COMMITTEE INVESTIGATION ISSUES.	BIBILONI, JOSE	017	0.10	42.00
10/07/19	UPDATE INVESTIGATION BINDER, TABLE OF CONTENTS, AND INVESTIGATION TIMELINE, AND DILIGENCE IN CONNECTION WITH DUPLICATION FOR TEAM	KASLOW, MATTHEW	017	3.00	1,320.00

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10/07/19	REVIEW COMMITTEE INVESTIGATION DOCUMENTS AND RELATED MATERIAL	SCHAEDELE, MICHAEL	017	3.30	2,673.00
10/08/19	FURTHER COMMUNICATIONS WITH BLANK ROME TEAM RE COMMITTEE INVESTIGATION ISSUES.	BIBILONI, JOSE	017	0.20	84.00
10/08/19	EMAIL TO S. TARR REGARDING UPDATES TO INVESTIGATION TIMELINE AND TO J. MINTZ AND P. GUFFY REGARDING RECEIPT OF ADDITIONAL DOCUMENT PRODUCTION	KASLOW, MATTHEW	017	0.10	44.00
10/08/19	DISCUSS COMMITTEE INVESTIGATION ISSUES AND CLAIMS WITH WITH S. BEACH, A. MIELKE AND WITH O. STEVENS AND J. MINTZ	SCHAEDELE, MICHAEL	017	0.60	486.00
10/08/19	REVIEW COMMITTEE INVESTIGATION DOCUMENTS BINDER AND REVISED TIME LINE MEMORANDA	SCHAEDELE, MICHAEL	017	0.70	567.00
10/08/19	ASSESS BECHTEL ARGUMENT AND DRAFT EMAIL MEMO REGARDING SAME	TARR, STANLEY	017	3.00	1,980.00
10/09/19	ADDITIONAL DOCUMENT REVIEW (.1); EMAILS W/ J. MINTZ, M. KASLOW RE SAME (.1)	GUFFY, PHILIP	017	0.20	93.00
10/09/19	PROCESS PRODUCTION DATA FOR LOADING TO DOCUMENT DATABASE	MATTHEWS, MICHAEL	017	0.50	135.00
10/09/19	REVIEW CERTAIN PRECEDENT RELATING TO DERIVATIVE ACTIONS AND LPS UNDER DE LAW AND NOTES FROM S. TARR REGARDING SAME	SCHAEDELE, MICHAEL	017	1.00	810.00
10/11/19	REVIEW OF TIME LINE AND COMMITTEE INVESTIGATION DOCUMENTS (BECHTEL)	SCHAEDELE, MICHAEL	017	1.90	1,539.00
10/14/19	DISCUSS PRIVILEGE ISSUES WITH J. LUCIAN	SCHAEDELE, MICHAEL	017	0.20	162.00
10/14/19	STRATEGIZE WITH J. LUCIAN REGARDING BECHTEL	SCHAEDELE, MICHAEL	017	0.50	405.00
10/15/19	STRATEGIZE WITH M. SCHAEDELE REGARDING INVESTIGATION AND PREFERENCE ANALYSIS	MINTZ, JOSEF	017	0.70	399.00
10/15/19	DISCUSS BECHTEL PRIVILEGE ISSUES WITH J. MINTZ	SCHAEDELE, MICHAEL	017	0.40	324.00

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10/15/19	DISCUSS STANDING AND RELATED MATTER ON BECHTEL WITH J. MINTZ	SCHAEDLE, MICHAEL	017	0.40	324.00
10/15/19	ANALYZE DRAFT MEMO RE: BECHTEL	TARR, STANLEY	017	2.00	1,320.00
10/16/19	ATTENTION TO COMMUNICATIONS WITH M. SCHAEDELE, S. TARR, AND J. MINTZ RE COMMITTEE INVESTIGATION ANALYSIS	BIBILONI, JOSE	017	0.40	168.00
10/16/19	NOTES TO AND FROM S. TARR ON CERTAIN STANDING ISSUES	SCHAEDLE, MICHAEL	017	0.50	405.00
10/16/19	ANALYZE CLAIMS; ANALYZE MEMO RE: BECHTEL	TARR, STANLEY	017	5.00	3,300.00
10/18/19	PREPARE SUMMARY FOR MEMO RE: BECHTEL	TARR, STANLEY	017	1.30	858.00
10/21/19	CALL WITH M. SILBERFARB REGARDING PRIVILEGE LOG AND RELATED ISSUES	MINTZ, JOSEF	017	0.50	285.00
10/21/19	EMAIL TO M. SCHAEDELE REGARDING PRIVILEGE LOG ISSUES AND RESEARCH (.3); FOLLOW UP DISCUSSION REGARDING SAME (.4); EMAIL TO M. SILBERFARB REGARDING SAME (.2)	MINTZ, JOSEF	017	0.90	513.00
10/21/19	REVIEW PRIVILEGE AND RELATED MATTERS WITH J. MINTZ	SCHAEDLE, MICHAEL	017	0.70	567.00
10/21/19	COMMUNICATE WITH J. MINTZ REGARDING ISSUES RELATED TO PRIVILEGE CLAIMS BY DEBTOR.	SILBERFARB, MICHAEL	017	0.50	300.00
10/22/19	CALL WITH J. LUCIAN AND M. SILBERFARB REGARDING PRIVILEGE ISSUES IN DEBTOR PRODUCTION	MINTZ, JOSEF	017	0.50	285.00
10/22/19	DISCUSS CERTAIN PRIVILEGE ISSUES (BECHTEL) WITH J. LUCIAN	SCHAEDLE, MICHAEL	017	0.30	243.00
10/22/19	DISCUSS CERTAIN PRIVILEGE ISSUES (BECHTEL) WITH J. MINTZ	SCHAEDLE, MICHAEL	017	0.40	324.00
10/22/19	COMMUNICATE WITH LUCIAN AND MINTZ REGARDING PRIVILEGE ISSUES RELATED TO INVESTIGATION.	SILBERFARB, MICHAEL	017	0.50	300.00

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10/23/19	TELEPHONE CALL WITH M. SILBERFARB IN REGARDS TO PRIVILEGE ISSUE	FLOREK, ADAM	017	0.30	112.50
10/23/19	COMMUNICATE WITH FLOREK REGARDING POTENTIAL RESEARCH PROJECT.	SILBERFARB, MICHAEL	017	0.30	180.00
10/24/19	RESEARCH PRIVILEGE ISSUES FOLLOWING TELEPHONE CALL WITH M. SILBERFARB (2.5); DRAFT E-MAIL REGARDING THE SAME (.3)	FLOREK, ADAM	017	2.80	1,050.00
10/24/19	RESEARCH REGARDING COMMITTEE INVESTIGATION ISSUES	KASLOW, MATTHEW	017	0.30	132.00
10/25/19	TELEPHONE CALL WITH M. SILBERFARB IN REGARDS TO PRIVILEGE ISSUE	FLOREK, ADAM	017	0.30	112.50
10/25/19	RESEARCH PRIVILEGE ISSUES FOLLOWING TELEPHONE CALL WITH M. SILBERFARB (1.0); TELEPHONE CALL REGARDING THE SAME (.3)	FLOREK, ADAM	017	1.30	487.50
10/25/19	FURTHER RESEARCH COMMITTEE INVESTIGATION ISSUES	KASLOW, MATTHEW	017	1.00	440.00
10/25/19	COMMUNICATE WITH FLOREK REGARDING RESEARCH OF PRIVILEGE ISSUES.	SILBERFARB, MICHAEL	017	0.20	120.00
10/26/19	FURTHER RESEARCH REGARDING COMMITTEE INVESTIGATION ISSUES	KASLOW, MATTHEW	017	1.80	792.00
10/27/19	FINALIZE RESEARCH INTO PRIVILEGE ISSUES REGARDING CREDITORS COMMITTEE (1.2); DRAFT E-MAIL TO M. SILBERFARB REGARDING THE SAME (1.0); CORRESPOND WITH M. SILBERFARB REGARDING THE SAME (.2)	FLOREK, ADAM	017	2.40	900.00
10/28/19	STRATEGY RE: BECHTEL INVESTIGATION	LUCIAN, JOHN	017	1.30	929.50
10/28/19	PARTICIPATE IN PORTION OF CALL REGARDING BECHTEL OFFER AND NEGOTIATING	MINTZ, JOSEF	017	0.60	342.00
10/28/19	DISCUSS CERTAIN ISSUES RELATING TO COMMITTEE INVESTIGATION WITH S. TARR AND M. KASLOW	SCHAEDEL, MICHAEL	017	0.50	405.00
10/28/19	REVIEW REVISED TIME LINE MEMO AND RELATED MATERIAL RELATING TO COMMITTEE INVESTIGATION	SCHAEDEL, MICHAEL	017	2.80	2,268.00

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10/28/19	REVIEW CASE RESEARCH REGARDING PRIVILEGE ISSUES (.6); COMMUNICATE WITH J. MINTZ (BLANK ROME) REGARDING THE SAME (.3)	SILBERFARB, MICHAEL	017	0.90	540.00
10/29/19	COMMUNICATIONS WITH M. SCHAEDELE AND BLANK ROME/TENEO TEAMS RE COMMITTEE INVESTIGATION UPDATE.	BIBILONI, JOSE	017	0.30	126.00
10/29/19	STRATEGY WITH SCHAEDELE RE: BECHTEL INVESTIGATION	LUCIAN, JOHN	017	0.40	286.00
10/29/19	CALL WITH TENEO REGARDING DILIGENCE AND SETTLEMENT STRATEGY AND PLAN ISSUES	MINTZ, JOSEF	017	0.70	399.00
10/29/19	DISCUSS INVESTIGATION/PLAN RELATED ISSUES WITH J. LUCIAN	SCHAEDELE, MICHAEL	017	0.30	243.00
10/29/19	PREPARE FOR BECHTEL/PLAN NEGOTIATIONS WITH TENEO TEAM AND J. MINTZ	SCHAEDELE, MICHAEL	017	0.50	405.00
10/29/19	REVIEW TIME LINE MEMO AND OTHER MATERIAL TO PREPARE FOR NEGOTIATING SESSION ON PLAN/BECHTEL ISSUES WITH DEBTORS	SCHAEDELE, MICHAEL	017	1.60	1,296.00
10/30/19	DRAFT COMMITTEE INVESTIGATION MEMORANDUM	KASLOW, MATTHEW	017	1.50	660.00
10/31/19	FURTHER DRAFT AND REVISE MEMORANDUM REGARDING FIDUCIARY DUTY ISSUES AND EMAIL COMMENTS TO J. MINTZ	KASLOW, MATTHEW	017	4.70	2,068.00
10/31/19	CALL WITH TENEO REGARDING STRATEGY ON COMMITTEE INVESTIGATION AND PREFERENCE ANALYSIS	MINTZ, JOSEF	017	0.60	342.00
10/31/19	ADDITIONAL REVIEW OF TIME LINE MEMO; OUTLINE ISSUES IN CONNECTION WITH PLAN AND INVESTIGATION	SCHAEDELE, MICHAEL	017	1.50	1,215.00
017 INVESTIGATION OF COMPANY				64.20	39,097.00
TASK: 019 LITIGATION					
10/01/19	EMAILS WITH M. SCHAEDELE RE DEBTORS' DRAFT PLEADINGS IN THE WILLIAMS ADVERSARY PROCEEDING (.2); REVIEW SAME (.2).	BIBILONI, JOSE	019	0.40	168.00

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10/01/19	NOTE TO AND FROM J. BIBILONI REGARDING WILLIAMS REVISED S.J. MOTION	SCHAEDLE, MICHAEL	019	0.10	81.00
10/01/19	NOTE TO AND FROM S. BEACH ON CALL ON WILLIAMS AND BECHTEL RELATED PRODUCTION ISSUES	SCHAEDLE, MICHAEL	019	0.20	162.00
10/01/19	REVIEW WILLIAMS REVISED S.J. MOTION AND RELATED MEMORANDUM	SCHAEDLE, MICHAEL	019	1.00	810.00
10/02/19	ATTENTION TO WILLIAMS LITIGATION MATTERS	LUCIAN, JOHN	019	0.20	143.00
10/02/19	DISCUSS WILLIAMS SJ MOTION WITH S. TARR	SCHAEDLE, MICHAEL	019	0.20	162.00
10/03/19	EMAIL TO M. SCHAEDELE REGARDING PREFERENCE ANALYSIS (.4); CALLS WITH J. BIBILONI REGARDING SAME (.4); EMAILS WITH F. FELDMAN REGARDING DOCUMENTS (.4)	MINTZ, JOSEF	019	1.20	684.00
10/07/19	DISCUSS WILLIAMS SJ MOTION WITH J. LUCIAN	SCHAEDLE, MICHAEL	019	0.20	162.00
10/07/19	REVIEW STATUS ON (I) CLAIMS RECONCILIATION; (II) WILLIAMS SJ; (III) PREFERENCE ANALYSIS; AND (IV) BECHTEL ISSUES WITH J. MINTZ AND S. TARR	SCHAEDLE, MICHAEL	019	1.20	972.00
10/08/19	REVIEW INFORMATION PROVIDED ON PREFERENCE ANALYSIS (.4); CALL WITH J. BIBILONI REGARDING RELATED RESEARCH (.4)	MINTZ, JOSEF	019	0.80	456.00
10/08/19	DISCUSS WILLIAMS SJ MOTION WITH S. BEACH, A. MIELKE AND COLLEAGUE WITH O. STEVENS AND J. MINTZ	SCHAEDLE, MICHAEL	019	0.80	648.00
10/08/19	REVIEW WILLIAMS SJ MOTION AND RELATED MEMORANDA	SCHAEDLE, MICHAEL	019	1.50	1,215.00
10/11/19	REVIEW J. BIBILONI RESEARCH FINDINGS (1.5); EMAILS WITH J. BIBILONI REGARDING SAME (.3); EMAIL TO M. SCHAEDELE REGARDING SAME (.2)	MINTZ, JOSEF	019	2.00	1,140.00
10/14/19	STRATEGY RE: WILLIAMS LITIGATION	LUCIAN, JOHN	019	0.40	286.00
10/14/19	STRATEGIZE WITH J. LUCIAN REGARDING WILLIAMS	SCHAEDLE, MICHAEL	019	0.50	405.00

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10/15/19	DISCUSSION WITH J. BIBILONI REGARDING RESEARCH FINDINGS	MINTZ, JOSEF	019	0.40	228.00
10/16/19	REVIEW OPINION ON WILLIAMS' MOTION FOR ABSTENTION/TRANSFER VENUE/DISMISSAL ISSUED BY JUDGE GROSS.	BIBILONI, JOSE	019	0.30	126.00
10/16/19	REVIEW OPINION AND ORDER ON WILLIAMS MOTION FOR VENUE TRANSFER ABSTENTION AND PARTIAL DISMISSAL (.4); EMAILS REGARDING SAME WITH CASE TEAM (.2); EMAILS WITH YOUNG CONAWAY REGARDING SAME (.3)	MINTZ, JOSEF	019	0.90	513.00
10/16/19	REVIEW GROSS, J. DECISION ON WILLIAMS INITIAL DISPOSITIVE MOTION PRACTICE	SCHAEDLE, MICHAEL	019	0.50	405.00
10/17/19	REVIEW AND ANALYZE OPINION ON WILLIAMS' MOTION FOR ABSTENTION/TRANSFER VENUE/DISMISSAL ISSUED BY JUDGE GROSS AND PREPARE SUMMARY OF SAME FOR COMMITTEE PER M. SCHAEDLE REQUEST.	BIBILONI, JOSE	019	4.70	1,974.00
10/17/19	FOLLOW UP EMAILS WITH F. SOTO REGARDING PREFERENCE ANALYSIS (.3)	MINTZ, JOSEF	019	0.30	171.00
10/17/19	CALL WITH TENEO TEAM AND J. BIBILONI REGARDING PREFERENCE ANALYSIS	MINTZ, JOSEF	019	0.60	342.00
10/17/19	REVIEW GROSS, J. DECISION ON INITIAL DISPOSITIVE MOTIONS IN WILLIAMS	SCHAEDLE, MICHAEL	019	0.20	162.00
10/18/19	ATTENTION TO PREPARATION OF SYNOPSIS OF COURT'S DECISION ON WILLIAMS' MOTION TO ABSTAIN/TRANSFER/DISMISS (.9); COMMUNICATIONS WITH J. MINTZ RE SAME (.2).	BIBILONI, JOSE	019	1.10	462.00
10/20/19	REVIEW WELDED V. PRIME NDT DOCKET (.2); REVIEW AMENDED SCHEDULING ORDER (.2); EMAIL TO E. EDWARDS REGARDING STATUS CONFERENCE (.1); FOLLOW UP REGARDING SAME (.1)	MINTZ, JOSEF	019	0.60	342.00

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10/21/19	COMMUNICATIONS WITH J. MINTZ RE COMMITTEE REPORT ON JUDGE GROSS' WILLIAMS OPINION (.2); FURTHER WORK ON SAME (.2); CIRCULATE TO J. LUCIAN AND M. SCHAEDELE (.1).	BIBILONI, JOSE	019	0.50	210.00
10/24/19	FINALIZE REPORT TO COMMITTEE RE OPINION ON WILLIAMS MOTION TO ABSTAIN, TRANSFER VENUE, AND DISMISS CERTAIN CLAIMS (.6) CONFER WITH J. MINTZ RE SAME (.1); SEND SAME TO COMMITTEE MEMBERS (.1).	BIBILONI, JOSE	019	0.80	336.00
10/28/19	TELEPHONE CONFERENCE WITH M. SCHAEDELE, S. TARR, C. BOGUSLASKI AND IN PART WITH J. LUCIAN AND J. MINTZ REGARDING INVESTIGATION STRATEGY (2.0); REVIEW M. SCHAEDELE EMAIL REGARDING THE SAME (0.1); RESEARCH REGARDING STANDING ISSUES (0.2); RESEARCH CERTAIN ISSUES REGARDING SAME (.6)	KASLOW, MATTHEW	019	2.70	1,188.00
10/29/19	REVIEW AND CIRCULATE DEBTORS' MOTION FOR PARTIAL SUMMARY JUDGMENT AND RELATED WILLIAMS ADVERSARY PAPERS TO BLANK ROME TEAM AS WELL AS PRIME NDT MOTION TO ADJOURN TRIAL.	BIBILONI, JOSE	019	1.00	420.00
10/29/19	REVIEW PRIME MOTION TO EXEND MEDIATION/TRIAL DATES	SCHAEDELE, MICHAEL	019	0.30	243.00
10/29/19	REVIEW WILLIAMS SJ MOTION	SCHAEDELE, MICHAEL	019	1.00	810.00
10/30/19	CALL WITH J. MINTZ RE WELDED'S MOTION FOR PARTIAL SUMMARY JUDGMENT FILED IN THE WILLIAMS ADVERSARY PROCEEDING (.1); REVIEW AND SUMMARIZE SAME FOR THE COMMITTEE (1.8).	BIBILONI, JOSE	019	1.90	798.00
10/31/19	EMAILS WITH YCST TEAM RE PRIME MEDIATION (.1); COORDINATION WITH BLANK ROME TEAM RE SAME (.2).	BIBILONI, JOSE	019	0.30	126.00
10/31/19	REVIEW AND SUMMARIZE PRIME NDT MOTION TO EXTEND TRIAL	MINTZ, JOSEF	019	0.40	228.00
10/31/19	REVIEW AND REVISE SUMMARY OF WILLIAMS MOTION FOR SUMMARY JUDGMENT;	MINTZ, JOSEF	019	0.50	285.00

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10/31/19	EMAILS WITH E. EDWARDS REGARDING PRIMENDT AND MEDIATION (.3); CALL WITH A. MIELKE REGARDING SAME (.2); REPORT TO J. LUCIAN AND M. SCHAEDELE REGARDING SAME (.2)	MINTZ, JOSEF	019	0.70	399.00
10/31/19	NOTES TO AND FROM J. MINTZ AND J. BIBILONI REGARDING PRIMENDT MEDIATION	SCHAEDELE, MICHAEL	019	0.20	162.00
10/31/19	DISCUSS CHUBB POSITION IN RESPECT OF CERTAIN ACTIONS WITH J. LUCIAN AND RELATED NOTES	SCHAEDELE, MICHAEL	019	0.20	162.00
10/31/19	OUTLINE COMMITTEE RESPONSE TO PRIME MOTION TO EXTEND DEADLINES	SCHAEDELE, MICHAEL	019	0.20	162.00
10/31/19	REVIEW WELDED SJ MOTION ON WILLIAMS	SCHAEDELE, MICHAEL	019	0.50	405.00
	019 LITIGATION			31.50	18,153.00
TASK: 021 OMNIBUS COURT HEARING - PREPARATION/ ATTENDANCE					
10/01/19	REVIEW NOTICE OF RE-SCHEDULED HEARING IN WELDED.	BIBILONI, JOSE	021	0.10	42.00
10/07/19	REVIEW NOTICE OF RE-SCHEDULED OMNIBUS HEARING.	BIBILONI, JOSE	021	0.10	42.00
10/28/19	CALL WITH B. FELDMAN (YCST) RE NOVEMBER 1 OMNIBUS HEARING AND REVIEW DOCKET IN CONNECTION WITH SAME.	BIBILONI, JOSE	021	0.20	84.00
10/30/19	REVIEW AGENDA FOR NOVEMBER 1 HEARING (.1); COORDINATE ATTENDANCE ON BEHALF OF THE COMMITTEE WITH J. MINTZ (.1).	BIBILONI, JOSE	021	0.20	84.00
	021 OMNIBUS COURT HEARING - PREPARATION/ ATTENDANCE			0.60	252.00
TASK: 022 PLAN AND DISCLOSURE STATEMENT					
10/01/19	REVIEW WELDED ADVISOR CALL SUMMARY SENT BY M. SCHAEDELE.	BIBILONI, JOSE	022	0.10	42.00
10/01/19	NOTE TO AND FROM WORKING GROUP REGARDING PROFESSIONALS CALL	SCHAEDELE, MICHAEL	022	0.10	81.00
10/01/19	REVIEW AGENDA FOR PROFESSIONALS CALL	SCHAEDELE, MICHAEL	022	0.20	162.00
10/01/19	PARTICIPATE IN PROFESSIONALS CALL	SCHAEDELE, MICHAEL	022	0.80	648.00

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10/08/19	CALLS WITH YOUNG CONAWAY REGARDING UPDATE, PLAN AND LITIGATION MATTERS	MINTZ, JOSEF	022	1.60	912.00
10/08/19	REVIEW AGENDA FOR PROFESSIONALS CALL	SCHAEDLE, MICHAEL	022	0.20	162.00
10/08/19	DISCUSS PLAN ISSUES WITH WITH S. BEACH, A. MIELKE AND COLLEAGUE WITH O. STEVENS AND J. MINTZ	SCHAEDLE, MICHAEL	022	0.30	243.00
10/08/19	PARTICIPATE IN PROFESSIONALS CALL	SCHAEDLE, MICHAEL	022	0.50	405.00
10/16/19	NOTES TO AND FROM A. MIELKE ON PLAN MATTERS AND BECHTEL MEETING	SCHAEDLE, MICHAEL	022	0.30	243.00
10/16/19	DISCUSS PLAN STRUCTURE AND RELATED ISSUES WITH S. BEACH	SCHAEDLE, MICHAEL	022	0.70	567.00
10/21/19	NOTE TO AND FROM A. MIELKE ON PROFESSIONALS CALL	SCHAEDLE, MICHAEL	022	0.10	81.00
10/22/19	PREPARE FOR (.5) AND ATTEND CALL WITH M. SCHAEDELE AND TENEO TEAM REGARDING PREFERENCE ANALYSIS AND CLAIMS POOL (.7)	MINTZ, JOSEF	022	1.20	684.00
10/22/19	REVIEW DOCUMENTS PREFERENCE ANALYSIS (1.0); EMAILS WITH TENEO AND BLANK ROME TEAMS REGARDING SAME (.5)	MINTZ, JOSEF	022	1.50	855.00
10/22/19	REVIEW RELEASES WITH CHUBB (1.0); EMAIL TO BLANK ROME AND TENEO TEAMS REGARDING SAME (.4); EMAILS WITH B. FELDMAN REGARDING SAME (.2)	MINTZ, JOSEF	022	1.60	912.00
10/22/19	NOTE TO S. BEACH ON PROFESSIONALS CALL AND PLAN ISSUES	SCHAEDLE, MICHAEL	022	0.10	81.00
10/23/19	REVIEW DRAFT RECOVERY ANALYSIS FROM TENEO	MINTZ, JOSEF	022	0.40	228.00
10/23/19	CALL WITH TENEO TEAM REGARDING PREFERENCE ANALYSIS AND CLAIMS ISSUES	MINTZ, JOSEF	022	0.70	399.00
10/23/19	STRATEGIZE WITH M. SCHAEDELE REGARDING PLAN ISSUES AND PREFERENCE ANALYSIS	MINTZ, JOSEF	022	0.80	456.00
10/23/19	DISCUSS PLAN NEGOTIATIONS AND RELATED ISSUES WITH J. LUCIAN	SCHAEDLE, MICHAEL	022	0.20	162.00

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
10/23/19	NOTES TO AND FROM S. BEACH REGARDING PLAN NEGOTIATIONS (.2); DISCUSS PLAN, CENTRAL STATES/BECHTEL AND RELATED ISSUES WITH S. BEACH	SCHAEDLE, MICHAEL	022	0.70	567.00
10/25/19	NOTES TO AND FROM S. BEACH REGARDING PLAN ISSUES	SCHAEDLE, MICHAEL	022	0.20	162.00
10/25/19	DISCUSS PLAN ISSUES WITH S. BEACH	SCHAEDLE, MICHAEL	022	0.40	324.00
10/28/19	RESEARCH REGARDING PLAN AND PREFERENCE PROGRAM (1.0); EMAIL TO M. SCHAEDELE REGARDING SAME (.2)	MINTZ, JOSEF	022	1.20	684.00
10/28/19	REVIEW AND COMMENT ON DRAFT CLAIMS WATERFALL (.6); REVIEW UNDERLYING DOCUMENTS REGARDING CERTAIN ASSUMPTIONS (1.0); EMAILS WITH TENEO REGARDING SAME (.3)	MINTZ, JOSEF	022	1.90	1,083.00
10/28/19	NEGOTIATE PLAN ISSUES WITH S. BEACH AND YCST WORKING GROUP	SCHAEDLE, MICHAEL	022	0.40	324.00
10/28/19	PREPARE MEMORANDUM ON PLAN ISSUES AND BECHTEL POSITION TO TENEO/BR WORKING GROUP	SCHAEDLE, MICHAEL	022	1.50	1,215.00
10/28/19	PARTICIPATE IN TELECONFERENCE ON PLAN ISSUES AND BECHTEL POSITION WITH TENEO/BR WORKING GROUP	SCHAEDLE, MICHAEL	022	2.00	1,620.00
10/29/19	REVIEW ALIX CONVENIENCE CLASS ANALYSIS	SCHAEDLE, MICHAEL	022	0.10	81.00
10/29/19	PARTICIPATE IN PROFESSIONALS' CALL REGARDING PLAN, ETC.	SCHAEDLE, MICHAEL	022	0.50	405.00
10/29/19	NEGOTIATE PLAN/BECHTEL ISSUES WITH S. BEACH AND YCST TEAM WITH J. MINTZ	SCHAEDLE, MICHAEL	022	1.50	1,215.00
10/31/19	DISCUSS PLAN ISSUES WITH S. BEACH	SCHAEDLE, MICHAEL	022	0.10	81.00
022 PLAN AND DISCLOSURE STATEMENT				21.90	15,084.00
TOTAL SERVICES				\$	124,710.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS
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FOR DISBURSEMENTS ADVANCED THROUGH OCTOBER 31, 2019

DATE	DESCRIPTION	AMOUNT
10/07/2019	WESTLAW MINTZ,JOSEF W	21.42
10/10/2019	LEXISSANDSTROM, FREDERICK/ACCESS CHARGE	95.04
10/11/2019	WESTLAW BIBILONI,JOSE	30.03
10/15/2019	WESTLAW WESTLAW BIBILONI,JOSE	102.90
10/24/2019	WESTLAW FLOREK,ADAM J	60.06
10/25/2019	LEXISSANDSTROM, FREDERICK/ACCESS CHARGE	23.76
10/25/2019	WESTLAW FLOREK,ADAM J	120.12
10/25/2019	WESTLAW KASLOW,MATTHEW	21.42
10/28/2019	LEXISMINTZ, JOSEF/DOC ACCESS	68.40
10/28/2019	LEXISMINTZ, JOSEF/ACCESS CHARGE	23.76
10/31/2019	WESTLAW KASLOW,MATTHEW	30.24
	DOCKET SEARCHES	108.40
	REPRODUCTION OF DOCUMENTS	159.40
TOTAL DISBURSEMENTS		\$ 864.95
CURRENT INVOICE TOTAL		\$ 125,574.95

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS

COMMITTEE

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JANUARY 28, 2020

TIME AND FEE SUMMARY

TIMEKEEPER	RATE	HOURS	FEES
ADAM J. FLOREK	375.00	7.10	2,662.50
CHRISTOPHER A. LEWIS	335.00	2.50	837.50
FREDERICK G. SANDSTROM	610.00	16.40	10,004.00
JOHN E. LUCIAN	715.00	4.80	3,432.00
JOSE F. BIBILONI	420.00	33.40	14,028.00
JOSEF W. MINTZ	570.00	44.70	25,479.00
MATTHEW E. KASLOW	440.00	16.60	7,304.00
MICHAEL B. SCHAEDELE	810.00	52.10	42,201.00
MICHAEL D. SILBERFARB	600.00	2.40	1,440.00
MICHAEL MATTHEWS	270.00	0.50	135.00
PHILIP M. GUFFY	465.00	0.20	93.00
STANLEY B. TARR	660.00	25.90	17,094.00
TOTALS		206.60	\$ 124,710.00

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

EXPENSE CATEGORY	SERVICE PROVIDER	TOTAL EXPENSES
Reproduction of Documents	In-house / Parcels, Inc.	\$159.40
Docket Searches	PACER	\$108.40
Legal Research	Lexis / Westlaw	\$597.15
TOTAL:		\$864.95

CERTIFICATE OF SERVICE

I, Jose F. Bibiloni hereby certify that on January 29, 2020, I served or caused to be served the foregoing *Twelfth 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 October 1, 2019 through October 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
P.O. Box 470
Perrysburg, OH 43552-0470

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)