

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)
) Chapter 11
)
WELDED CONSTRUCTION, L.P., *et al.*,¹) Case No. 18-12378 (CSS)
)
Debtors.) (Jointly Administered)
)
)
) Objection Deadline: March 5, 2020 at 4:00 p.m. (ET)
) Hearing Date: March 31, 2020 at 10:00 a.m. (ET)

**NOTICE OF FIFTH INTERIM FEE REQUEST OF THE
DEBTORS' PROFESSIONALS FOR THE PERIOD FROM
OCTOBER 1, 2019 THROUGH AND INCLUDING DECEMBER 31, 2019**

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

PLEASE TAKE NOTICE that, pursuant to that certain *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 230] (the "**Interim Compensation Order**"), the professionals retained by the above-captioned debtors and debtors-in-possession (collectively, the "**Debtors**") hereby apply for interim quarterly allowance of compensation and reimbursement of expenses (each, a "**Fee Request**," and collectively, the "**Fee Requests**") for all interim monthly fee applications covering the period from October 1, 2019, through and including December 31, 2019. Summaries of the fees and expenses subject to the Fee Requests are provided in the attachments hereto and set forth in the monthly fee applications previously filed with the Court. Pursuant to the Interim Compensation Order, the Debtors were previously authorized to pay, on an interim basis, eighty (80%) percent of the amount of compensation requested and one hundred (100%) percent of the reimbursable expenses requested without further order from the Court upon the expiration of a 20-day objection period.

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.



PLEASE TAKE FURTHER NOTICE THAT OBJECTIONS, IF ANY, TO A FEE REQUEST ARE REQUIRED TO BE FILED AND SERVED ON THE AFFECTED PROFESSIONAL AND THE FOLLOWING PARTIES ON OR BEFORE MARCH 5, 2020 AT 4:00 P.M. (ET): (i) Welded Construction, L.P., P.O. Box 470, Perrysburg, Ohio 43552-0470 (Attn: Frank A. Pometti, Chief Restructuring Officer); (ii) counsel for the Debtors, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801 (Attn: Allison S. Mielke, Esq.); (iii) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Federal Building, Room 2207, 844 North King Street, Wilmington, Delaware 19801 (Attn: Jane M. Leamy, Esq.); (iv) counsel for the Debtors' postpetition lender, Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, New York 10166 (Attn: Michael A. Rosenthal, Esq. and Matthew K. Kelsey, Esq.); and (v) counsel for the Official Committee of Unsecured Creditors, Blank Rome LLP, 1201 Market Street, Suite 800, Wilmington, Delaware 19801 (Attn: Jose F. Bibiloni, Esq.).

PLEASE TAKE FURTHER NOTICE that a hearing to consider approval of the Fee Requests will be held before the Honorable Christopher S. Sontchi, United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Courtroom No. 6, Wilmington, Delaware 19801, on **March 31, 2020 at 10:00 a.m. (ET)**.

Dated: February 14, 2020
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Allison S. Mielke

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

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

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| WELDED CONSTRUCTION, L.P., <i>et al.</i> , ¹ |) | Case No. 18-12378 (CSS) |
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| Debtors. |) | (Jointly Administered) |
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| |) | Objection Deadline: March 5, 2020 at 4:00 p.m. (ET) |
| |) | Hearing Date: March 31, 2020 at 10:00 a.m. (ET) |

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

| | |
|--|---|
| Name of Applicant: | Young Conaway Stargatt & Taylor, LLP |
| Authorized to Provide Professional Services to: | Debtors and Debtors-in-Possession |
| Date of Retention: | October 22, 2018 (Order entered November 15, 2018 [Docket No. 234]) |
| Period for which compensation and reimbursement is sought: | October 1, 2019 through and including December 31, 2019 |

| Monthly Fee Application Filing Date & Docket No. | Period Covered | Total Requested Fees | Total Requested Expenses | CNO Filing Date & Docket No. | Amount of Fees Paid or to be Paid (80%) | Amount of Expenses Paid or to be Paid (100%) | Amount of Holdback Fees Sought (20%) |
|--|--------------------|-----------------------|--------------------------|------------------------------|---|--|--------------------------------------|
| 11/22/19 D.I. 1120 | 10/1/19 – 10/31/19 | \$560,539.50 | \$11,934.73 | 12/13/19 D.I. 1154 | \$448,431.60 | \$11,934.73 | \$112,107.90 |
| 12/30/19 D.I. 1171 | 11/1/19 – 11/30/19 | \$483,150.00 | \$20,283.17 | 1/21/20 D.I. 1192 | \$386,520.00 | \$20,283.17 | \$96,630.00 |
| 1/21/20 D.I. 1191 | 12/1/19 – 12/31/19 | \$395,395.50 | \$19,816.70 | 2/11/20 D.I. 1219 | \$316,316.40 | \$19,816.70 | \$79,079.10 |
| Totals | | \$1,439,085.00 | \$52,034.60 | | \$1,151,268.00 | \$52,034.60 | \$287,817.00 |

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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FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 11

WELDED CONSTRUCTION, L.P., *et al.*,

Case No. 18-12378 (CSS)

Debtors.

(Jointly Administered)

Objection Deadline: March 5, 2020 at 4:00 p.m. (ET)

Hearing Date: March 31, 2020 at 10:00 a.m. (ET)

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

Name of Applicant:

Landis Rath & Cobb LLP, Special Counsel

Authorized to Provide Professional
Services to:

Debtors and Debtors-in-Possession

Date of Retention:

October 22, 2018 (Order entered November 15, 2018
[Docket No. 232])Period for which compensation and
reimbursement is sought:October 1, 2019 through and including
November 30, 2019

| Monthly Fee Application Filing Date & Docket No. | Period Covered | Total Requested Fees | Total Requested Expenses | CNO Filing Date & Docket No. | Amount of Fees Paid or to be Paid (80%) | Amount of Expenses Paid or to be Paid (100%) | Amount of Holdback Fees Sought (20%) |
|---|-----------------------|----------------------------|--------------------------------|------------------------------------|--|--|---|
| 12/6/19 D.I. 1138 | 10/1/19 – 11/30/19 | \$31,972.00 ¹ | \$237.45 | 12/27/19 D.I. 1169 | \$25,543.20 | \$237.45 | \$6,385.80 |
| 2/14/20 D.I. 1227 | 12/1/19 – 12/31/19 | \$4,775.50 | \$0.00 | Deadline to Object 3/5/20 | \$3,820.40 | \$0.00 | \$955.10 |
| Totals | | \$36,747.50 | \$237.45 | | \$29,363.60 | \$237.45 | \$7,340.90 |

¹ The total fees requested in the *Combined Eighth Monthly Application of Landis Rath & Cobb, LLP, Special Counsel to the Debtors and Debtors-in-Possession, for Compensation and Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 for the Period from October 1, 2019 Through and Including November 30, 2019* (the “**LRC 8th Fee Request**”) do not reflect the fees actually incurred by Landis Rath & Cobb LLP (“**LRC**”) during the months of October and November 2019, as set forth in the fee detail submitted in support of the LRC 8th Fee Request (the “**Fee Detail**”). For the avoidance of doubt, LRC seeks compensation in the amount set forth in the Fee Detail.