

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: July 21, 2020 at 4:00 p.m. (ET)

NOTICE OF EIGHTEENTH 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 APRIL 1, 2020 THROUGH APRIL 30, 2020

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 July 1, 2020, the *Eighteenth 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 April 1, 2020 through April 30, 2020 (“**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 \$52,382.40 (80% of \$65,478.00) for professional services rendered and (ii) reimbursement of expenses incurred in the amount of \$99.30 as counsel to the Committee during the period from April 1, 2020 through and including April 30, 2020.

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 **July 21, 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 \$52,382.40 (80% of \$65,478.00) for services rendered to the Committee and reimbursement of \$99.30 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: July 1, 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.*

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FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
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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: July 21, 2020 at 4:00 p.m. (ET)

**SUMMARY COVER SHEET TO THE EIGHTEENTH 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 APRIL 1, 2020 THROUGH APRIL 30, 2020**

<i>Name of Applicant:</i>	<u>Blank Rome LLP</u>
<i>Authorized to provide professional services to:</i>	<u>Official Committee of Unsecured Creditors</u>
<i>Monthly period for which compensation and reimbursement is sought:</i>	<u>April 1, 2020 through April 30, 2020</u>
<i>Monthly amount of compensation sought as actual, reasonable, and necessary:</i>	<u>\$52,382.40 (80% of \$65,478.00)</u>
<i>Monthly amount of expense reimbursement sought as actual, reasonable, and necessary:</i>	<u>\$99.30</u>
<i>Petition date:</i>	<u>October 22, 2018</u>
<i>Date of retention:</i>	<u>October 30, 2018</u>
<i>Date of order approving employment:</i>	<u>December 6, 2018</u>
<i>Total compensation approved by interim order to date:</i>	<u>\$2,070,714.25</u>
<i>Total expenses approved by interim order to date:</i>	<u>\$19,786.81</u>
<i>Total compensation and expenses paid to date:</i>	<u>\$2,090,501.06</u>

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: \$672.95

Blended rate in this application for all timekeepers: \$672.95

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: 5

Number of professionals in this application not included in staffing plan: 1

Number of professionals billing fewer than 15 hours to the case during this period: 2

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 2.90 hours and the corresponding compensation requested hereby is approximately \$1,363.00. 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

1/29/2020 D.I. 1198	10/1/19 – 10/31/19 (Twelfth Monthly)	\$124,710.00	\$864.95	\$124,710.00 (100%) D.I. 1279	\$864.95 (100%) D.I. 1279
1/29/2020 D.I. 1200	11/1/19 – 11/30/19 (Thirteenth Monthly)	\$94,347.50	\$1019.10	\$94,347.50 (100%) D.I. 1279	\$1019.10 (100%) D.I. 1279
2/12/2020 D.I. 1220	12/1/19 – 12/31/19 (Fourteenth Monthly)	\$77,625.50	\$227.36	\$77,625.50 (100%) D.I. 1279	\$227.36 (100%) D.I. 1279
5/11/2020 D.I. 1369	1/1/20 – 1/31/20 (Fifteenth Monthly)	\$70,589.00	\$84.90	\$70,589.00 (100%) D.I. 1455	\$84.90 (100%) D.I. 1455
5/13/2020 D.I. 1380	2/1/20 – 2/29/20 (Sixteenth Monthly)	\$52,589.00	\$134.90	\$52,589.00 (100%) D.I. 1455	\$134.90 (100%) D.I. 1455
5/13/2020 D.I. 1381	3/1/20 – 3/31/20 (Seventeenth Monthly)	\$67,640.50	\$184.80	\$67,640.50 (100%) D.I. 1455	\$184.80 (100%) D.I. 1455

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**EIGHTEENTH MONTHLY APPLICATION OF
BLANK ROME LLP, COUNSEL TO THE OFFICIAL COMMITTEE
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THE PERIOD FROM APRIL 1, 2020 THROUGH APRIL 30, 2020**

This eighteenth 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 April 1, 2020 through and including April 30, 2020 (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. On February 14, 2020, Blank Rome filed the *Fifth 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 1, 2019 Through December 31, 2019* [Docket No. 1229] (the “**Fifth Interim Fee Application**”). On March 17, 2020, the Court entered an order [Docket No. 1279] approving the Fifth Interim Fee Application.

13. On May 15, 2020, Blank Rome filed the *Sixth 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, 2020 Through March 31, 2020* [Docket No. 1388] (the “**Sixth Interim Fee Application**”). On June 17, 2020, the Court entered an order [Docket No. 1455] approving the Sixth Interim Fee Application.

14. 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 \$2,090,501.06 by the Debtors in connection with Blank Rome’s previous monthly and interim fee applications.

15. 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.

16. 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

17. 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

- (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

18. The following is provided in response to the questions set forth in Section C.5 of the U.S. Trustee Guidelines:

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 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.

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.

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, 2020. 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

19. 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 \$65,478.00 and payment by the Debtors of 80% of this amount (\$52,382.40), and (b) the allowance and payment of 100% of its actual and necessary expenses incurred during the Application Period in the amount of \$99.30, all in accordance with the terms of the Administrative Order.

Summary of Fees

20. The total number of hours expended by Blank Rome professionals and paraprofessionals in performing professional services for the Committee during the Application Period was **97.30** hours at a blended billing rate of **\$672.95** per hour. The value of these services has been computed at the rates Blank Rome customarily charges for similar services provided to other clients.

21. 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.

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

(Task Code 003) Avoidance Action Analysis

Total Hours: 3.10 Total Fees: \$2,180.50

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: 1.20 Total Fees: \$564.00

This category includes Blank Rome's work in connection with case procedural matters, including 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: \$8,136.50

This category includes Blank Rome's work in reviewing and analyzing issues related to certain creditors' claims and lien issues, including the analysis of proposed settlements between the Debtors and certain creditors.

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

Total Hours: 4.60 Total Fees: \$2,790.00

This category includes Blank Rome's work advising the Committee on all matters, including Committee meetings and other frequent communications, drafting certain internal Committee documents, preparing presentations on case issues, and other Committee business.

(Task Code 013) Fee Applications – Internal

Total Hours: 2.90 Total Fees: \$1,363.00

This category includes Blank Rome's work preparing its sixteenth monthly fee application (February 2020), as well as other fee application-related papers.

(Task Code 014) Fee Applications – Others

Total Hours: 7.00 Total Fees: \$3,290.00

This category includes Blank Rome's work preparing and filing Teneo's fifteenth and sixteenth monthly fee applications (January and February 2020), as well as initial work in connection with Teneo's seventeenth monthly fee application (March 2020).

(Task Code 019) Litigation

Total Hours: 0.20 Total Fees: \$170.00

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

(Task Code 022) Plan and Disclosure Statement

Total Hours: 65.70 Total Fees: \$46,234.00

This category includes Blank Rome's work reviewing, analyzing, and researching issues in connection with the Debtors' chapter 11 plan, disclosure statement, and solicitation procedures order, including the preparation of a committee support letter. This category also includes time spent reviewing, negotiating, and researching issues related to the plan settlement with Bechtel, McCaig and the Debtors and the Bechtel indemnity agreement, as well as initial work on the plan administrator agreement and related matters.

(Task Code 024) Relief from Stay and Adequate Protection

Total Hours: 1.20 Total Fees: \$750.00

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.

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

23. Reimbursement of expenses in the amount of \$99.30 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**

24. 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).

25. 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

26. 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.

27. 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.

28. 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 \$52,382.40 (80% of \$65,478.00), together with the reimbursement of expenses incurred in the amount of \$99.30, and such other and further relief that the Court deems just, proper and necessary.

[Signature follows]

Dated: July 1, 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
(APRIL 1, 2020 THROUGH APRIL 30, 2020)**

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, 2020¹	CURRENT APPLICATION PERIOD
Partner	\$821.00	\$723.79
Associate	\$503.00	\$470.13
Paralegal	\$318.00	N/A
Aggregated:	\$673.00 (average)	\$672.95 (blended)

¹ This column reflects the average billing rates, rounded to the nearest dollar, as of January 1, 2020, for current active timekeepers in connection with non-bankruptcy engagements.

EXHIBIT B**SUMMARY OF TIMEKEEPERS INCLUDED IN THIS FEE APPLICATION
(APRIL 1, 2020 THROUGH APRIL 30, 2020)**

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	30.30	\$25,755.00	\$850.00	\$780.00	2	\$23,634.00
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	6.20	\$4,743.00	\$765.00	\$690.00	2	\$4,278.00
Josef W. Mintz	Partner	Finance, Restructuring and Bankruptcy	Member of PA and NJ Bars since 2008; Member of DE Bar since 2011	41.30	\$25,812.50	\$625.00	\$535.00	2	\$22,095.50
Matthew E. Kaslow	Associate	Finance, Restructuring and Bankruptcy	Member of NJ Bar since 2015; Member of PA Bar since 2016	0.10	\$49.50	\$495.00	N/A	N/A	\$49.50
Jose F. Bibiloni	Associate	Finance, Restructuring and Bankruptcy	Member of DE Bar since 2016; Member of PA Bar since 2017	19.40	\$9,118.00	\$470.00	\$355.00	3	\$6,887.00
TOTALS:				97.30	\$65,478.00				\$56,944.00

EXHIBIT C**STAFFING PLAN FOR BLANK ROME LLP
FOR THE PERIOD APRIL 1, 2020 THROUGH APRIL 30, 2020****STAFFING PLAN:**

CATEGORY OF TIMEKEEPER	NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER DURING THE APPLICABLE PERIOD¹	AVERAGE HOURLY RATE
Partners	3	\$746.67
Associates	1	\$470.00

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 99.9% 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
(APRIL 1, 2020 THROUGH APRIL 30, 2020)**

TASK CODE	TASK DESCRIPTION	NUMBER OF HOURS	AMOUNT OF FEES
003	Avoidance Action Analysis	3.10	\$2,180.50
006	Case Administration	1.20	\$564.00
007	Claims Administration and Objections	11.40	\$8,136.50
008	Creditors Committee	4.60	\$2,790.00
013	Fee Applications – Internal	2.90	\$1,363.00
014	Fee Applications – Others	7.00	\$3,290.00
019	Litigation	0.20	\$170.00
022	Plan and Disclosure Statement	65.70	\$46,234.00
024	Relief from Stay and Adequate Protection	1.20	\$750.00
TOTALS:		97.30	\$65,478.00

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: JUNE 30, 2020
 MATTER NO. 154278-01600 04015
 INVOICE NO. 1902401

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

FOR LEGAL SERVICES RENDERED THROUGH APRIL 30, 2020

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
TASK: 003 AVOIDANCE ACTION ANALYSIS					
04/10/20	COMMUNICATIONS WITH J. MINTZ AND TENE TEAM REGARDING DISCLOSURE STATEMENT AND PLAN ISSUES WITH RESPECT TO TREATMENT OF PREFERENCES	BIBILONI, JOSE	003	0.30	141.00
04/13/20	GUIDANCE FROM J. LUCIAN REGARDING PREFERENCE ISSUES IN CONNECTION WITH PLAN CONFIRMATION	KASLOW, MATTHEW	003	0.10	49.50
04/13/20	ASSIGNMENT TO KASLOW REGARDING PREFERENCE RESEARCH	LUCIAN, JOHN	003	0.20	153.00
04/13/20	ANALYZE PREFERENCE ISSUES WITH MINTZ	LUCIAN, JOHN	003	0.30	229.50
04/14/20	EMAILS WITH J. MINTZ AND TENE TEAM REGARDING PREFERENCE ISSUES AND ANALYZE TENE MATERIALS REGARDING SAME	BIBILONI, JOSE	003	0.40	188.00
04/14/20	PREPARE PLAN LANGUAGE REGARDING SAME	LUCIAN, JOHN	003	0.40	306.00
04/14/20	PREPARE FOR AND PARTICIPATE IN CALL WITH CHUBB REGARDING AVOIDANCE ACTION ANALYSIS	LUCIAN, JOHN	003	0.40	306.00
04/14/20	REVIEW TENE MATERIALS ON CERTAIN TRANSFERS	SCHAEDLE, MICHAEL	003	0.50	425.00
04/17/20	REVIEW SELECT PREFERENCE ISSUES AND ANALYSIS	LUCIAN, JOHN	003	0.50	382.50

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 2

INVOICE NO. 1902401

JUNE 30, 2020

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
003 AVOIDANCE ACTION ANALYSIS				3.10	2,180.50
TASK: 006 CASE ADMINISTRATION (GENERAL)					
04/16/20	MONITOR WELDED BANKRUPTCY AND ADVERSARY DOCKETS AND UPDATE CASE CALENDAR	BIBILONI, JOSE	006	0.90	423.00
04/23/20	WORK ON CASE CALENDAR AND SEND SAME TO DOCKETING	BIBILONI, JOSE	006	0.30	141.00
006 CASE ADMINISTRATION (GENERAL)				1.20	564.00
TASK: 007 CLAIMS ADMINISTRATION AND OBJECTIONS					
04/01/20	NOTES TO J. MINTZ AND J. LUCIAN ON OCAT SETTLEMENT	SCHAEDLE, MICHAEL	007	0.40	340.00
04/01/20	DISCUSS OCAT SETTLEMENT AND RELATED MATTERS WITH J. LUCIAN	SCHAEDLE, MICHAEL	007	0.40	340.00
04/01/20	DISCUSS OCAT SETTLEMENT WITH S. BEACH	SCHAEDLE, MICHAEL	007	0.50	425.00
04/12/20	REVIEW AND COMMENT ON PROPOSED RESOLUTION TO MCNALLY'S CLAIM UNDER 10TH OMNIBUS OBJECTION (.4); EMAIL TO B. FELDMAN REGARDING SAME (.2)	MINTZ, JOSEF	007	0.60	375.00
04/13/20	EMAILS WITH J. MINTZ AND TENEO REGARDING SETTLEMENT OF MCNALLY CLAIM AND REVIEW RELATED PAPERS AND CORRESPONDENCE	BIBILONI, JOSE	007	0.30	141.00
04/13/20	REVIEW AND ANALYZE SETTLEMENT WITH E. MCNALLY (.5); EMAIL TO TENEO REGARDING SAME (.4)	MINTZ, JOSEF	007	0.90	562.50
04/16/20	REVIEW COLUMBIA GAS SETTLEMENT MOTION	BIBILONI, JOSE	007	0.20	94.00
04/17/20	ANALYZE MECHANICS LIEN CLAIM ISSUES AND DISCUSS WITH YCST	LUCIAN, JOHN	007	0.70	535.50
04/18/20	UPDATE FROM J. LUCIAN ON SETTLEMENTS WITH LIEN CLAIMANTS	MINTZ, JOSEF	007	0.30	187.50
04/20/20	CALL WITH BEACH REGARDING VARIOUS CLAIMS	LUCIAN, JOHN	007	0.20	153.00
04/22/20	CALL WITH A. MIELKE REGARDING POTENTIAL CLAIMS AGAINST CERTAIN LIEN CLAIMANTS (.3); REVIEW DOCUMENTS (.3)	MINTZ, JOSEF	007	0.60	375.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 3

INVOICE NO. 1902401

JUNE 30, 2020

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
04/23/20	COMMUNICATIONS WITH J. MINTZ REGARDING PROPOSED CATERPILLAR FINANCIAL SETTLEMENT AND REVIEW RELATED PAPERS	BIBILONI, JOSE	007	0.20	94.00
04/23/20	REVIEW PROPOSED SETTLEMENT WITH CFSC (.4); EMAIL TO TENEO REGARDING SAME (.2)	MINTZ, JOSEF	007	0.60	375.00
04/23/20	REVIEW MATERIALS RELATING TO CAT FINANCIAL SETTLEMENT	SCHAEDLE, MICHAEL	007	1.20	1,020.00
04/24/20	EMAILS WITH A. STEPANYANTS (TENEO) REGARDING PROPOSED CATERPILLAR FINANCIAL SETTLEMENT	BIBILONI, JOSE	007	0.10	47.00
04/28/20	EMAILS CONCERNING CLAIM SETTLEMENTS WITH CROSS COUNTER, SUNBELT, OUTLAW (.3); REVIEW MATERIALS (.4)	MINTZ, JOSEF	007	0.40	250.00
04/28/20	REVIEW QUESTIONS ON LIEN CLAIMS (.3); EMAILS WITH J. LUCIAN REGARDING SAME (.4)	MINTZ, JOSEF	007	0.70	437.50
04/29/20	EMAILS WITH M. SCHAEDLE REGARDING LIEN ACTIONS	MINTZ, JOSEF	007	0.30	187.50
04/29/20	EMAIL AND CALL TO A. MIELKE REGARDING LIEN ACTIONS	MINTZ, JOSEF	007	0.40	250.00
04/29/20	REVIEW NOTES ON CG, SP, EP AND RELATED MATTERS	SCHAEDLE, MICHAEL	007	0.30	255.00
04/30/20	STRATEGY WITH MINTZ AND SCHAEDLE REGARDING ANALYSIS OF VARIOUS	LUCIAN, JOHN	007	0.30	229.50
04/30/20	CALL WITH A. MIELKE REGARDING LIEN ACTIONS	MINTZ, JOSEF	007	0.30	187.50
04/30/20	CONSIDER SUNBELT SETTLEMENT ISSUES	SCHAEDLE, MICHAEL	007	0.40	340.00
04/30/20	DISCUSS CG, SP, EP AND LIEN RELATED ISSUES WITH J. MINTZ AND J. LUCIAN	SCHAEDLE, MICHAEL	007	0.50	425.00
04/30/20	REVIEW DRAFT PLEADINGS RELATING TO LIEN ACTIONS	SCHAEDLE, MICHAEL	007	0.60	510.00
007 CLAIMS ADMINISTRATION AND OBJECTIONS				11.40	8,136.50
TASK: 008 CREDITORS COMMITTEE (INTERNAL/COMMUNICATION W/CREDITC					
04/17/20	EMAILS WITH J. MINTZ AND COMMITTEE MEMBERS REGARDING MCNALLY SETTLEMENT	BIBILONI, JOSE	008	0.10	47.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 4

INVOICE NO. 1902401

JUNE 30, 2020

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
04/17/20	DILIGENCE CREDITOR INQUIRY	MINTZ, JOSEF	008	0.40	250.00
04/17/20	DRAFT AND SEND UPDATE TO COMMITTEE REGARDING PLAN AND DISCLOSURE STATEMENT AND MCNALLY SETTLEMENT	MINTZ, JOSEF	008	0.70	437.50
04/22/20	COMMUNICATIONS WITH CREDITORS REGARDING WELDED CHAPTER 11 PLAN AND DISCLOSURE STATEMENT	BIBILONI, JOSE	008	0.40	188.00
04/22/20	RESPOND TO CREDITOR INQUIRY	MINTZ, JOSEF	008	0.30	187.50
04/27/20	EMAILS WITH J. MINTZ AND TENEO TEAM REGARDING COORDINATION OF COMMITTEE CALL	BIBILONI, JOSE	008	0.10	47.00
04/27/20	NOTES TO AND FROM J. MINTZ AND J. LUCIAN ON COMMITTEE MEETING AGENDA AND PA APPOINTMENT	SCHAEDEL, MICHAEL	008	0.40	340.00
04/28/20	EMAILS WITH PARTY IN INTEREST	MINTZ, JOSEF	008	0.20	125.00
04/29/20	ATTENTION TO CREDITOR INQUIRES AND RESPONDING TO SAME	BIBILONI, JOSE	008	0.10	47.00
04/29/20	EMAILS WITH J. MINTZ REGARDING COMMITTEE UPDATE CALL AND COORDINATION OF SAME	BIBILONI, JOSE	008	0.20	94.00
04/30/20	REVIEW AND RESPOND TO CREDITOR INQUIRY	BIBILONI, JOSE	008	0.20	94.00
04/30/20	COMMUNICATIONS WITH J. MINTZ, M. SCHAEDEL, AND J. LUCIAN REGARDING COMMITTEE UPDATE CALL AND COORDINATE SAME	BIBILONI, JOSE	008	0.90	423.00
04/30/20	DEVELOP AGENDA FOR COMMITTEE CALL ON PLAN AND RELATED MATTERS	SCHAEDEL, MICHAEL	008	0.60	510.00
008 CREDITORS COMMITTEE (INTERNAL/COMMUNICATION W/CREI				4.60	2,790.00

TASK: 013 FEE APPLICATIONS - INTERNAL

04/14/20	WORK ON BLANK ROME'S JANUARY 2020 FEE APPLICATION	BIBILONI, JOSE	013	0.60	282.00
04/14/20	WORK ON BLANK ROME'S FEBRUARY 2020 FEE APPLICATION AND EMAILS WITH N. LONG REGARDING SAME	BIBILONI, JOSE	013	1.20	564.00
04/16/20	ATTENTION TO BLANK ROME'S JANUARY 2020 FEE APPLICATION	BIBILONI, JOSE	013	0.30	141.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS
COMMITTEE
FILE NUMBER: 154278-01600

PAGE NUMBER: 5
INVOICE NO. 1902401
JUNE 30, 2020

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
04/16/20	WORK ON BLANK ROME'S MARCH 2020 FEE APPLICATION	BIBILONI, JOSE	013	0.80	376.00
	013 FEE APPLICATIONS - INTERNAL			2.90	1,363.00
	TASK: 014 FEE APPLICATIONS - OTHERS (INCLUDES REVIEW AND OBJECTIONS				
04/03/20	ATTENTION TO TENEO'S 15TH MONTHLY FEE APPLICATION (JAN. 2020)	BIBILONI, JOSE	014	0.20	94.00
04/09/20	PREPARE AND FINALIZE TENEO JANUARY 2020 FEE APPLICATION (FIFTEENTH MONTHLY), FILE SAME, AND COORDINATE SERVICE OF SAME	BIBILONI, JOSE	014	2.10	987.00
04/09/20	PREPARE AND FINALIZE TENEO FEBRUARY 2020 FEE APPLICATION (SIXTEENTH MONTHLY), FILE SAME, AND COORDINATE SERVICE OF SAME	BIBILONI, JOSE	014	2.40	1,128.00
04/13/20	EMAILS WITH F. SOTO REGARDING TENEO MARCH FEE APPLICATION	BIBILONI, JOSE	014	0.20	94.00
04/15/20	EMAILS WITH F. SOTO REGARDING TENEO MARCH FEE APPLICATION AND PREPARE SAME	BIBILONI, JOSE	014	1.10	517.00
04/16/20	ATTENTION TO TENEO'S MARCH 2020 FEE APPLICATION	BIBILONI, JOSE	014	0.20	94.00
04/21/20	WORK ON TENEO'S MARCH 2020 FEE APPLICATION	BIBILONI, JOSE	014	0.60	282.00
04/23/20	ATTENTION TO TENEO'S MARCH FEE APPLICATION	BIBILONI, JOSE	014	0.10	47.00
04/30/20	EMAILS WITH F. SOTO (TENEO) REGARDING SIXTH INTERIM FEE APPLICATIONS	BIBILONI, JOSE	014	0.10	47.00
	014 FEE APPLICATIONS - OTHERS (INCLUDES REVIEW AND OBJECTI			7.00	3,290.00
	TASK: 019 LITIGATION				
04/01/20	REVIEW MODIFIED LITIGATION SCHEDULE ON WILLIAMS ACTION AND NOTE TO J. LUCIAN	SCHAEDLE, MICHAEL	019	0.20	170.00
	019 LITIGATION			0.20	170.00
	TASK: 022 PLAN AND DISCLOSURE STATEMENT				
02/19/20	REVISE AND COMMENT ON BECHTEL SETTLEMENT AGREEMENT; NOTES TO AND FROM S. TARR, J. MINTZ AND J. LUCIAN (.5)	SCHAEDLE, MICHAEL	022	2.90	2,465.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 6

INVOICE NO. 1902401

JUNE 30, 2020

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
04/01/20	STRATEGY/ANALYSIS REGARDING DISCLOSURE STATEMENT AND POTENTIAL CREDIT RECOVERIES	LUCIAN, JOHN	022	0.50	382.50
04/01/20	REVIEW AND COMMENT ON GLOBAL NOTES TO LIQUIDATION ANALYSIS (.8); EMAILS WITH TENEO REGARDING SAME (.2); EMAILS WITH M. SCHAEDEL REGARDING SAME (.2); EMAIL TO DEBTOR'S COUNSEL REGARDING COMMENTS TO AMENDED PLAN, DISCLOSURE STATEMENT AND LIQUIDATION ANALYSIS (.3)	MINTZ, JOSEF	022	1.50	937.50
04/03/20	EMAILS WITH S. BEACH REGARDING CHANGES TO DISCLOSURE STATEMENT	MINTZ, JOSEF	022	0.50	312.50
04/03/20	WORK ON COMMITTEE LETTER OF SUPPORT	MINTZ, JOSEF	022	0.50	312.50
04/06/20	EMAILS FROM R. POPPITI, M. ROSENTHAL AND COUNSEL TO ZURICH REGARDING PLAN SETTLEMENT REVISION (.3); REVIEW REVISION TO PLAN SETTLEMENT AGREEMENT REGARDING BECHTEL LETTER OF CREDIT PROCEEDS (.5); EMAIL TO R. POPPITI REGARDING SAME (.2)	MINTZ, JOSEF	022	1.00	625.00
04/06/20	REVIEW ISSUES RELATING TO PLAN (CHUBB; BECHTEL) AND RELATED EMAIL (1.2); NOTES TO AND FROM J. MINTZ AND J. LUCIAN REGARDING SAME (0.4)	SCHAEDEL, MICHAEL	022	1.60	1,360.00
04/07/20	PREPARE FOR AND PARTICIPATE IN CALL WITH DEBTOR AND CHUBB REGARDING PLAN AND OVERSIGHT COMMITTEE ISSUES; FOLLOW UP WITH MINTZ AND SCHAEDEL REGARDING SAME	LUCIAN, JOHN	022	1.00	765.00
04/07/20	EMAILS WITH M. SCHAEDEL CONCERNING ZURICH LETTERS AND CREDIT AND AMENDMENT TO PLAN LANGUAGE	MINTZ, JOSEF	022	0.40	250.00
04/07/20	CALL WITH M. SCHAEDEL REGARDING CHUBB (.2); PREPARE FOR (.3) AND ATTEND CALL WITH YOUNG CONAWAY AND CHUBB REGARDING AMENDMENT TO PLAN LANGUAGE (1.0)	MINTZ, JOSEF	022	1.50	937.50

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 7

INVOICE NO. 1902401

JUNE 30, 2020

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
04/07/20	REPORT FROM J. MINTZ ON PLAN NEGOTIATION AND NOTES TO AND FROM J. LUCIAN REGARDING SAME	SCHAEDLE, MICHAEL	022	0.70	595.00
04/08/20	STRATEGY SESSION WITH SCHAEDLE AND MINTZ REGARDING PLAN AND CHUBB ISSUES	LUCIAN, JOHN	022	0.80	612.00
04/08/20	ATTENTION TO CHUBB PREFERENCE RELEASE ISSUE (.5) ; CALL WITH M. SCHAEDLE AND J. LUCIAN REGARDING SAME (1.2); REVIEW MATERIALS (1.0)	MINTZ, JOSEF	022	2.70	1,687.50
04/08/20	REVIEW J. MINTZ NOTE ON CERTAIN PLAN RELATED INFORMATION	SCHAEDLE, MICHAEL	022	0.20	170.00
04/08/20	REVIEW YCST PROPOSED PLAN REVISIONS	SCHAEDLE, MICHAEL	022	0.30	255.00
04/08/20	DISCUSS PLAN RELATED MATTERS WITH J. MINTZ AND J. LUCIAN	SCHAEDLE, MICHAEL	022	1.00	850.00
04/08/20	REVIEW PLAN/DS AND RELATED INFORMATION	SCHAEDLE, MICHAEL	022	2.80	2,380.00
04/09/20	DISCUSS DISCLOSURE STATEMENT MATTERS WITH J. MINTZ	BIBILONI, JOSE	022	0.20	94.00
04/09/20	REVIEW REVISION TO PLAN RELEASE LANGUAGE (.8); EMAILS WITH B. FELDMAN REGARDING SAME (.2)	MINTZ, JOSEF	022	1.00	625.00
04/09/20	REVIEW CHUBB ISSUES AND DOCUMENTS (1.5); EMAILS WITH M. COLLINS AND S. POTEET REGARDING NEXT CALL (.3); CALL WITH S. BEACH (.3)	MINTZ, JOSEF	022	2.10	1,312.50
04/09/20	REVIEW YCST PROPOSED PLAN REVISIONS AND NOTES TO AND FROM J. MINTZ AND J. LUCIAN REGARDING SAME (.3)	SCHAEDLE, MICHAEL	022	1.40	1,190.00
04/10/20	EMAILS WITH J. LUCIAN REGARDING CHUBB DISCUSSION	MINTZ, JOSEF	022	0.10	62.50
04/10/20	FOLLOW UP WITH A. STEPANYANTS REGARDING LIQUIDATION ANALYSIS	MINTZ, JOSEF	022	0.20	125.00
04/10/20	REVIEW CHUBB PREFERENCE DILIGENCE (.5) ; UPDATE CHART (1.3); EMAIL TO TENE0 REGARDING INPUT REQUIRED (.4)	MINTZ, JOSEF	022	2.20	1,375.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 8

INVOICE NO. 1902401

JUNE 30, 2020

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
04/10/20	NOTES TO AND FROM WORKING GROUP AND CHUBB REGARDING TIMING OF NEGOTIATION	SCHAEDLE, MICHAEL	022	0.20	170.00
04/10/20	REVIEW PROPOSED PLAN MODIFICATIONS	SCHAEDLE, MICHAEL	022	0.60	510.00
04/11/20	EMAILS WITH A. STEPANYANTS REGARDING LIQUIDATION ANALYSIS (.2); EMAIL TO CHUBB REGARDING DISCUSSION ON PLAN LANGUAGE (.2)	MINTZ, JOSEF	022	0.40	250.00
04/12/20	CALL WITH A. STEPANYANTS REGARDING CHUBB PLAN DILIGENCE	MINTZ, JOSEF	022	0.20	125.00
04/12/20	REVIEW EDITS TO PLAN AND DS LANGUAGE PROPOSED BY ZURICH (1.0); EMAIL TO R. POPPITI REGARDING SAME (.4)	MINTZ, JOSEF	022	1.40	875.00
04/13/20	EMAILS WITH TENEO TEAM AND J. MINTZ REGARDING PLAN AND PREFERENCE ISSUES AND REVIEW MATERIALS PROVIDED BY TENEO	BIBILONI, JOSE	022	0.20	94.00
04/13/20	EMAIL FROM R. POPPITI REGARDING ZURICH LANGUAGE TO PLAN AND DISCLOSURE STATEMENT	MINTZ, JOSEF	022	0.20	125.00
04/13/20	REVIEW TENEO MATERIAL ON PLAN ISSUE AND RELATED NOTES TO AND FROM COMMITTEE WORKING GROUP	SCHAEDLE, MICHAEL	022	0.60	510.00
04/14/20	PREPARE FOR (.4) AND ATTEND CALL WITH CHUBB REGARDING EDITS TO PLAN AND DISCLOSURE STATEMENT (.6); EMAIL TO CHUBB COUNSEL REGARDING FOLLOW UP LANGUAGE (.6)	MINTZ, JOSEF	022	1.60	1,000.00
04/14/20	REVIEW DILIGENCE FROM ALIX AND TENEO ON PREFERENCES (.5); REVIEW AND REVISE LANGUAGE ON PREFERENCE ACTIONS TO ADDRESS CHUBB COMMENTS (1.0); STRATEGIZE WITH M. SCHAEDLE REGARDING REVISIONS TO PLAN (.4)	MINTZ, JOSEF	022	1.90	1,187.50
04/14/20	REVIEW J. MINTZ NOTE ON PLAN MODIFICATION	SCHAEDLE, MICHAEL	022	0.20	170.00
04/14/20	PREPARE FOR CHUBB PLAN NEGOTIATION WITH J. MINTZ	SCHAEDLE, MICHAEL	022	1.00	850.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 9

INVOICE NO. 1902401

JUNE 30, 2020

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
04/15/20	CALL WITH M. SCHAEDEL REGARDING STATUS OF PLAN REVISIONS WITH CHUBB	MINTZ, JOSEF	022	0.30	187.50
04/15/20	DISCUSS PLAN ADMINISTRATOR ISSUES WITH J. MINTZ	SCHAEDEL, MICHAEL	022	0.20	170.00
04/15/20	DISCUSS STATUS OF PLAN NEGOTIATION WITH CHUBB WITH J. MINTZ	SCHAEDEL, MICHAEL	022	0.40	340.00
04/16/20	CALL WITH A. STEPANYANTS REGARDING RECOVERY ANALYSIS	MINTZ, JOSEF	022	0.20	125.00
04/17/20	CALL S. BEACH REGARDING PLAN AND DS STATUS	MINTZ, JOSEF	022	0.40	250.00
04/17/20	REVIEW DS OBJECTION	SCHAEDEL, MICHAEL	022	0.40	340.00
04/18/20	ATTENTION TO EMAILS REGARDING DISCLOSURE STATEMENT AND PLAN; STRATEGY WITH MINTZ REGARDING SAME	LUCIAN, JOHN	022	0.20	153.00
04/20/20	EMAIL WITH J. MINTZ REGARDING DISCLOSURE STATEMENT OBJECTION AND REVIEW SAME	BIBILONI, JOSE	022	0.20	94.00
04/20/20	EMAILS WITH COUNSEL TO CHUBB REGARDING PLAN (.3); EMAIL TO CASE TEAM REGARDING SAME (.2)	MINTZ, JOSEF	022	0.50	312.50
04/20/20	REVIEW OBJECTION TO DISCLOSURE STATEMENT FILED BY SUNBELT AND OTHERS (.6); EMAIL TO CASE TEAM REGARDING SAME (.2); EMAIL TO B. FELDMAN REGARDING SAME (.2)	MINTZ, JOSEF	022	1.00	625.00
04/21/20	REVIEW AND REVISE PLAN LANGUAGE FROM CHUBB (.3); EMAILS WITH M. COLLINS REGARDING SAME (.2); EMAIL TO S. BEACH REGARDING SAME (.4)	MINTZ, JOSEF	022	0.90	562.50
04/21/20	NOTE TO AND FROM J. MINTZ AND J. LUCIAN ON DS OBJECTION	SCHAEDEL, MICHAEL	022	0.20	170.00
04/21/20	REVIEW CHUBB CHANGES TO POR AND NOTE TO AND FROM J. MINTZ REGARDING SAME	SCHAEDEL, MICHAEL	022	0.40	340.00
04/22/20	EMAILS WITH S. BEACH REGARDING PLAN REVISIONS AND STATUS	MINTZ, JOSEF	022	0.20	125.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 10

INVOICE NO. 1902401

JUNE 30, 2020

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
04/22/20	EMAILS WITH B. FELDMAN REGARDING SUNBELT MATTERS AND DISCLOSURE STATEMENT OBJECTION	MINTZ, JOSEF	022	0.40	250.00
04/22/20	REVIEW E-CORRESPONDENCE ON PLAN MODIFICATION FROM YCST, CHUBB COUNSEL, AND J. MINTZ	SCHAEDLE, MICHAEL	022	0.40	340.00
04/23/20	EMAILS WITH J. MINTZ REGARDING UPDATED VERSIONS OF WELDED PLAN, DISCLOSURE STATEMENT, AND SOLICITATION PROCEDURES ORDER	BIBILONI, JOSE	022	0.20	94.00
04/23/20	REVIEW REVISED PLAN (.8), DISCLOSURE STATEMENT (.9) AND SOLICITATION PROCEDURES ORDER (.8); EMAILS WITH YOUNG CONAWAY REGARDING SAME (.2)	MINTZ, JOSEF	022	2.70	1,687.50
04/23/20	CONSIDER DS OBJECTION AND RELATED MATTERS	SCHAEDLE, MICHAEL	022	0.40	340.00
04/23/20	REVIEW PLAN, DS AND RELATED MATERIALS	SCHAEDLE, MICHAEL	022	2.30	1,955.00
04/24/20	EMAILS WITH J. MINTZ REGARDING COMMITTEE PLAN SUPPORT LETTER (.3); INITIAL ATTENTION TO SAME (.8)	BIBILONI, JOSE	022	1.10	517.00
04/24/20	EMAILS WITH J. BIBILONI REGARDING PLAN SUPPORT LETTER	MINTZ, JOSEF	022	0.30	187.50
04/24/20	CALL WITH M. SCHAEDELE REGARDING PLAN AND DISCLOSURE STATEMENT ISSUES (.3); REVIEW BEACH EMAIL ON TIMING (.2); EMAIL TO S. BEACH REGARDING OPEN ISSUES AND DS OBJECTION (.3)	MINTZ, JOSEF	022	0.80	500.00
04/24/20	DISCUSS DS APPROVAL ISSUES AND PA MATTERS WITH J. MINTZ	SCHAEDLE, MICHAEL	022	0.40	340.00
04/24/20	OUTLINE PA AGREEMENT	SCHAEDLE, MICHAEL	022	1.00	850.00
04/27/20	EMAILS WITH J. MINTZ REGARDING DEBTORS' AS-FILED PLAN, DS, AND REVISED SOLICITATION PROCEDURES ORDER	BIBILONI, JOSE	022	0.10	47.00
04/27/20	PREPARE COMMITTEE PLAN SUPPORT LETTER	BIBILONI, JOSE	022	1.70	799.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS
COMMITTEE

FILE NUMBER: 154278-01600

PAGE NUMBER: 11

INVOICE NO. 1902401

JUNE 30, 2020

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
04/27/20	EMAILS WITH B. FELDMAN REGARDING DISCLOSURE STATEMENT (.2); EMAILS WITH M. SCHAEDELE AND J. LUCIAN REGARDING SAME (.2)	MINTZ, JOSEF	022	0.40	250.00
04/27/20	REVIEW AND REVISE COMMITTEE SUPPORT LETTER	MINTZ, JOSEF	022	0.70	437.50
04/27/20	REVIEW ECORRESPONDENCE ON PLAN MATTERS	SCHAEDELE, MICHAEL	022	0.40	340.00
04/27/20	REVIEW FILED PLAN AND DS AND RELATED PAPERS	SCHAEDELE, MICHAEL	022	1.60	1,360.00
04/28/20	EMAILS WITH J. MINTZ REGARDING DEBTORS' AMENDED PLAN, DS, AND SOLICITATION PROCEDURES ORDER AND REVIEW OF SAME	BIBILONI, JOSE	022	0.20	94.00
04/28/20	EMAILS WITH J. MINTZ REGARDING COMMITTEE PLAN SUPPORT LETTER AND FURTHER REVISE SAME	BIBILONI, JOSE	022	0.40	188.00
04/28/20	STRATEGY WITH SCHAEDELE AND MINTZ REGARDING PLAN ISSUES	LUCIAN, JOHN	022	0.50	382.50
04/28/20	DISCUSSION WITH M. SCHAEDELE AND J. LUCIAN REGARDING OPEN ISSUES ON PLAN	MINTZ, JOSEF	022	0.50	312.50
04/28/20	FURTHER REVISIONS TO COMMITTEE SUPPORT LETTER	MINTZ, JOSEF	022	0.60	375.00
04/28/20	REVIEW PLAN AND DISCLOSURE STATEMENT (.4); EMAILS REGARDING SAME WITH J. BIBILONI (.2)	MINTZ, JOSEF	022	0.60	375.00
04/28/20	DISCUSS PLAN ISSUES WITH J. LUCIAN AND J. MINTZ	SCHAEDELE, MICHAEL	022	0.50	425.00
04/29/20	CONFER WITH J. MINTZ REGARDING DRAFTING WELDED PLAN ADMINISTRATOR AGREEMENT	BIBILONI, JOSE	022	0.10	47.00
04/29/20	EMAILS (.3) AND CALL WITH B. FELDMAN REGARDING DISCLOSURE OBJECTION OF CROSS COUNTRY ET AL. (.3)	MINTZ, JOSEF	022	0.60	375.00
04/29/20	WORK ON PLAN ADMINISTRATOR AGREEMENT	MINTZ, JOSEF	022	0.60	375.00
04/29/20	REVIEW COMMITTEE SUPPORT LETTER ON PLAN AND NOTES TO AND FROM J. MINTZ REGARDING SAME	SCHAEDELE, MICHAEL	022	0.30	255.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS
COMMITTEE
FILE NUMBER: 154278-01600

PAGE NUMBER: 12
INVOICE NO. 1902401
JUNE 30, 2020

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
04/30/20	CALL AND EMAILS WITH J. MINTZ REGARDING PLAN ADMINISTRATOR AGREEMENT (.2); REVIEW AGREEMENTS (.2)	BIBILONI, JOSE	022	0.40	188.00
04/30/20	STRATEGY WITH SCHAEDEL AND MINTZ REGARDING PLAN ISSUES	LUCIAN, JOHN	022	0.20	153.00
04/30/20	REVIEW ISSUES REGARDING EXECUTION OF PLAN SETTLEMENT AGREEMENT	MINTZ, JOSEF	022	0.30	187.50
04/30/20	CALL WITH M. SCHAEDEL AND J. LUCIAN REGARDING PLAN AND RELATED ISSUES	MINTZ, JOSEF	022	0.40	250.00
04/30/20	EMAILS WITH S. BEACH REGARDING REVISED PLAN LANGUAGE (.3); EMAILS WITH M. SCHAEDEL REGARDING SAME (.2); REVIEW DOCUMENTS (.3)	MINTZ, JOSEF	022	0.60	375.00
04/30/20	WORK ON PLAN ADMINISTRATOR AGREEMENT (.5); CALL TO M. SCHAEDEL REGARDING SAME (.2); CALL TO S. TARR REGARDING SAME (.3)	MINTZ, JOSEF	022	1.00	625.00
04/30/20	DISCUSS PLAN RELATED ISSUES WITH K. GWYNNE	SCHAEDEL, MICHAEL	022	0.30	255.00
04/30/20	DISCUSS PLAN RELATED ISSUES WITH C. BOGUSLASKI	SCHAEDEL, MICHAEL	022	0.30	255.00
04/30/20	OUTLINE RESPONSE TO SUNBELT DS OBJECTION	SCHAEDEL, MICHAEL	022	0.40	340.00
04/30/20	COMPARE AMENDED DS TO SUNBELT DS OBJECTION	SCHAEDEL, MICHAEL	022	0.90	765.00
022 PLAN AND DISCLOSURE STATEMENT				65.70	46,234.00
TASK: 024 RELIEF FROM STAY AND ADEQUATE PROTECTION					
04/12/20	REVIEW AND COMMENT ON STIPULATION TO MODIFY THE AUTOMATIC STAY WITH TIBBS AND TRANSCANADA	MINTZ, JOSEF	024	0.60	375.00
04/13/20	REVIEW AND REVISE STAY RELIEF STIPULATION REGARDING TIBBS AND TC INSURANCE COVERAGE ACTION (.3); CALL WITH D. CARICKHOFF REGARDING SAME (.3)	MINTZ, JOSEF	024	0.60	375.00
024 RELIEF FROM STAY AND ADEQUATE PROTECTION				1.20	750.00
TOTAL SERVICES				\$	65,478.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS
 COMMITTEE
 FILE NUMBER: 154278-01600

PAGE NUMBER: 13
 INVOICE NO. 1902401
 JUNE 30, 2020

FOR DISBURSEMENTS ADVANCED THROUGH APRIL 30, 2020

DATE	DESCRIPTION	AMOUNT
02/03/2020	MISC HARD COSTS COURTCALL, LLC HEARING ON PRE-TRIAL MATTERS IN THE PRIME CASE.	30.00
02/06/2020	COURTCALL, LLC HEARING ON PRE-TRIAL MATTERS IN THE PRIME CASE.	30.00
	DOCKET SEARCHES	30.10
	REPRODUCTION OF DOCUMENTS	9.20
TOTAL DISBURSEMENTS		\$ 99.30
CURRENT INVOICE TOTAL		\$ 65,577.30

TIME AND FEE SUMMARY

TIMEKEEPER	RATE	HOURS	FEES
JOHN E. LUCIAN	765.00	6.20	4,743.00
JOSE F. BIBILONI	470.00	19.40	9,118.00
JOSEF W. MINTZ	625.00	41.30	25,812.50
MATTHEW E. KASLOW	495.00	0.10	49.50
MICHAEL B. SCHAEDELE	850.00	30.30	25,755.00
TOTALS		97.30	\$ 65,478.00

EXHIBIT E**SUMMARY AND DETAILS OF EXPENSE
REIMBURSEMENT REQUESTED, BY CATEGORY
(APRIL 1, 2020 THROUGH APRIL 30, 2020)**

EXPENSE CATEGORY	SERVICE PROVIDER	TOTAL EXPENSES
Docket Searches	PACER	\$30.10
Reproduction of Documents	In-house / Parcels, Inc.	\$9.20
Telephonic Court Appearances	CourtCall, LLC	\$60.00
TOTAL:		\$99.30

CERTIFICATE OF SERVICE

I, Jose F. Bibiloni hereby certify that on July 1, 2020, I served or caused to be served the foregoing *Eighteenth 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 April 1, 2020 through April 30, 2020*, 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)