

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: Sept. 11, 2020 at 4:00 p.m. (ET)

Hearing Date: TBD

**SUMMARY COVER SHEET TO THE TWENTY-FIRST MONTHLY
AND FINAL 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 JULY 31, 2020**

Name of Applicant:

Blank Rome LLP

Authorized to provide professional services to:

Official Committee of Unsecured Creditors

Petition date:

October 22, 2018

Date of retention:

October 30, 2018

Date of order approving employment:

December 6, 2018

*Monthly period for which compensation
and reimbursement is sought:*

July 1, 2020 to July 31, 2020

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

\$91,958.00

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

\$344.19

*Final period for which compensation
and reimbursement is sought:*

October 30, 2018 to July 31, 2020

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.



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

\$2,502,469.25²

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

\$21,822.97³

*Total compensation approved by interim
order to date:*

\$2,375,511.25

Total expenses approved by interim order to date:

\$20,989.78

*Total allowed compensation and expenses paid
pursuant to interim compensation order to date:*

\$2,335,541.63

*Blended rate in this application for all
attorneys during final application period:*

\$602.72

*Blended rate in this application for all
timekeepers during final application period:*

\$591.36

*Compensation sought in this application already
paid pursuant to a monthly compensation order
but not yet allowed by interim order:*

N/A

*Expenses sought in this application already
paid pursuant to a monthly compensation order
but not yet allowed by interim order:*

N/A

*Number of professionals included in this
application:*

23

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

18

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

12

*Are any rates higher than those approved or
disclosed at retention?*

Yes.

² This amount includes \$35,000.00 for estimated fees for work performed after July 31, 2020 in connection with various post-effective date tasks including, without limitation, communications with the Committee, preparations for the interim fee hearing on August 13, 2020 and preparation and filing of this final fee application and the final fee application of Teneo.

³ This amount includes \$500.00 for estimated expenses incurred after July 31, 2020. Blank Rome reserves the right to amend or supplement this final fee application to seek reimbursement of any additional expenses incurred.

This is a(n): x monthly interim x final application

This final fee application includes time expended in connection with Blank Rome's previous interim and monthly fee applications totaling approximately 24.20 hours and the corresponding compensation requested hereby is approximately \$12,604.50. This final fee application also requests fees incurred in connection with the preparation and filing of this final fee application. By this final fee application, Blank Rome requests allowance and payment of such fees.

Summary of Monthly Fee Applications Previously Filed by Blank Rome LLP:⁴

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)	\$74,198.00	\$283.00	\$74,198.00 (100%) D.I. 989	\$283.00 (100%) D.I. 989

⁴ The following monthly fee applications may be collectively referred to in this final fee application as the “**Monthly Fee Applications**”. The Monthly Fee Applications are incorporated herein by reference and made a part hereof.

Monthly Fee Application		Amounts Requested		Amounts Approved to Date	
Date Filed	Period Covered	Fees	Expenses	Fees	Expenses
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

Monthly Fee Application		Amounts Requested		Amounts Approved to Date	
Date Filed	Period Covered	Fees	Expenses	Fees	Expenses
7/1/2020 D.I. 1519	4/1/20 – 4/30/20 (Eighteenth Monthly)	\$65,478.00	\$99.30	\$51,661.84 (80%) D.I. 1567	\$99.30 (100%) D.I. 1567
7/3/2020 D.I. 1525	5/1/20 – 5/31/20 (Nineteenth Monthly)	\$94,674.00	\$383.72	\$75,739.20 (80%) D.I. 1567	\$383.72 (100%) D.I. 1567
7/6/2020 D.I. 1527	6/1/20 – 6/30/20 (Twentieth Monthly)	\$144,645.00	\$719.95	\$115,716.00 (80%) D.I. 1567	\$719.95 (100%) D.I. 1567

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

In re:

WELDED CONSTRUCTION, L.P., *et al.*,¹

Debtors.

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) Chapter 11

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) Case No. 18-12378 (CSS)

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) **Objection Deadline: Sept. 11, 2020 at 4:00 p.m. (ET)**
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**TWENTY-FIRST MONTHLY AND FINAL 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 JULY 31, 2020**

This twenty-first monthly and final fee application for compensation and reimbursement of expenses (this “*Final Fee Application*”) is filed by Blank Rome LLP (“*Blank Rome*”) and seeks the entry of an order authorizing the allowance on a final basis and payment by the above-captioned debtors (the “*Debtors*”), to the extent not previously paid, of compensation in the amount of \$2,502,469.25 for professional services rendered and reimbursement of actual and necessary expenses incurred in the amount of \$21,822.97 as counsel to the Official Committee of Unsecured Creditors (the “*Committee*”) of the Debtors during the aggregate final period from October 30, 2018 through July 31, 2020 (the “*Final Application Period*”), including the allowance and payment of previously unrequested compensation in the amount of \$91,958.00 for services rendered and reimbursement of actual and necessary expenses incurred in the amount of \$344.19 as counsel to the Committee during the monthly period from July 1, 2020 through July 31, 2020 (the “*Twenty-First*”).

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.

Monthly Period”). In support of this Final 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.

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 *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* dated November 15, 2018 [D.I. 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 Final 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.

General Background

4. On October 22, 2018 (the “*Petition Date*”), the Debtors each filed a voluntary petition under chapter 11 the Bankruptcy Code (the “*Chapter 11 Cases*” or “*Restructuring Proceedings*”). Pursuant to sections 1107 and 1108 of the Bankruptcy Code, prior to the Effective Date (as defined below), the Debtors managed and operated their businesses and property as debtors in possession. No trustee or examiner has been appointed in the Chapter 11 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. After 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 [D.I. 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* [D.I. 311].

8. At every step, Blank Rome worked with the Committee to maximize recoveries for unsecured creditors and achieve its goals in these Chapter 11 Cases. At the outset of the cases, Blank Rome analyzed the Debtors’ request for postpetition financing, among many other of the Debtors’ motions and applications. Blank Rome objected to the Debtors’ financing motion [D.I. 273], and ultimately negotiated a settlement between the DIP lender, Debtors, and Committee that protected the Committee’s rights by, *inter alia*, striking releases in favor of the DIP lender, guaranteeing Committee input and consultation rights with respect to the DIP budget, and providing the Committee with a reasonable timeline to conduct an investigation regarding the prepetition conduct of the Debtors and their equity owners. *See* D.I. 315, Nov. 30, 2018 Hr’g. Tr. at 8-12.

9. Working closely with Teneo and the Debtors, Blank Rome assisted the Debtors with the customer completion agreement process and supported the Debtors in negotiating various valuable accommodations with key customers, vendors and creditors (both in the context

of contested matters and in confidential negotiations), which enhanced creditor outcomes generally (the completion process has enabled full pay outcomes for approximately \$183 million in general unsecured claims. Notably, as part of this completion process and due to its role in it, the Committee, working closely with Blank Rome, was integral in identifying an opportunity to sell the Debtors' significant, early stage contract with Consumers. The Committee, through its financial advisor, Teneo, took the lead for the Debtors' estates in structuring and finalizing the Debtors' assumption and assignment of the Consumers contract to Snelson Companies, Inc. for \$2.5 million, which resulted in an overall net benefit to the estates of \$4.7 million. *See* D.I. 414, Jan. 3, 2019 Hr'g. Tr. at 6-7; D.I. 487, *Order Authorizing Assumption and Assignment of Certain Executory Contract Pursuant to Section 365 of the Bankruptcy Code*. Relatedly, the Committee has worked closely with the Debtors in evaluating all major claims reconciliation matters throughout the Chapter 11 Cases, driving value-maximizing outcomes in this area as well.

10. Blank Rome assisted the Committee in negotiating with the Debtors and Federal Insurance Company in connection with litigation funding for the Debtors' estates claims against The Williams Companies. The Firm evaluated Welded estate rights in connection with such recoveries, as well as Federal's various rights, and negotiated a Court-approved sharing and funding arrangement that will enable the fair and reasonable maximization of estate recoveries from Williams. *See* D.I. 745, *Order Approving the Litigation Funding and Cooperation Agreement*. The litigation also should minimize both Federal and Williams claims against those estates.

11. Blank Rome supported the Debtors' equipment sale process by, among other things, reviewing proposals from various equipment liquidators, providing analysis regarding the structure of the equipment sales, and was involved in the ultimate selection of Gordon Bros./Ritchie Bros. as equipment auctioneer. After the Court's entry of the sale order [D.I. 655], the Debtors and the

Committee engaged in a negotiation with Gordon Bros./Ritchie Bros. regarding the terms and conditions relating to one of the largest public auctions of “yellow steel” assets known to Ritchie Bros. This negotiation limited possible decrements to sale/auction outcomes. The Debtors, with support from the Committee, then conducted a successful public auction for the Debtors’ owned and leased equipment that resulted in aggregate proceeds for the Debtors’ estates totaling \$30.4 million. *See* D.I. 1364, Amended Disclosure Statement at 27. Additionally, Blank Rome played a role in the sale of the Debtors’ Perrysburg, Ohio headquarters, helping select a real estate broker for the property and commenting on various real estate sale papers.

12. While cooperative efforts relating to the Debtors’ customer completion agreements, sale process, and other matters described above were ongoing, Blank Rome simultaneously conducted an extensive investigation into the prepetition conduct of the Debtors and their equity owners. Blank Rome took informal discovery from the Debtors and the Partner Settlement Parties (as defined in the Amended Plan) and received and analyzed thousands of pages of pertinent documents and diligence materials in connection with the investigation. The investigation revealed the existence of certain potential claims and causes of action. *See* D.I. 1364, Amended Disclosure Statement at 3. The potential claims that were uncovered by the investigation resulted in a global settlement between the Debtors, Committee, and Partner Settlement Parties that became part of the Debtors’ Amended Plan.

13. On May 8, 2020, the Debtors filed the solicitation versions of the *Amended Chapter 11 Plan of Welded Construction, L.P. and Welded Construction Michigan, LLC* [D.I. 1363] (the “**Amended Plan**”) and *Amended Disclosure Statement for the Amended Chapter 11 Plan of Welded Construction, L.P. and Welded Construction Michigan, LLC* [D.I. 1364] (the “**Disclosure Statement**”).

14. As noted herein and as set forth more fully in the Disclosure Statement,² the Amended Plan contained a comprehensive settlement between the Committee, the Debtors, and the Partner Settlement Parties. The settlement resolved the Committee's investigation into potential claims against the Partner Settlement Parties and included, among other consideration: (i) a \$2 million cash payment to the Debtors' estates; (ii) indemnification of the Debtors' estate in connection with over \$38 million of unsecured pension withdrawal liability claims; (iii) withdrawal of administrative and general unsecured claims asserted by entities affiliated with Bechtel Corporation in excess of \$9 million; and (iv) a release of the Partner Settlement Parties by the Debtors and their creditors. The global settlement was the result of substantial efforts by Blank Rome, working with Teneo, to review, research and analyze the Debtors' pre-petition transactions to ensure that maximum value was returned to creditors in connection with the Amended Plan.

15. After reaching the global settlement, Blank Rome worked to achieve confirmation of the Amended Plan and assisted the Debtors in connection with same. To that end, Blank Rome reviewed and analyzed the Amended Plan and negotiated with key stakeholders, such as Federal Insurance Company, to work toward plan confirmation. Blank Rome researched various issues, filed a reply in support of the Amended Plan [D.I. 1476], and argued for confirmation of the Amended Plan at the confirmation hearing held on June 24, 2020. *See* D.I. 1526, Jun. 24, 2020 Hr'g. Tr. at 47-58.

16. On June 25, 2020, the Court entered its *Findings of Fact, Conclusions of Law, and Order Confirming the Amended Chapter 11 Plan of Welded Construction, L.P. and Welded Construction Michigan, LLC* [D.I. 1505], and on July 31, 2020, the Amended Plan went effective [D.I. 1555].

² The applicable provisions of the Disclosure Statement are incorporated as if set forth more fully herein.

Blank Rome's Prior Interim Fee Orders

17. On March 11, 2019, the Court entered the *Order Approving First Interim Fee Application of Professionals to the Official Committee of Unsecured Creditors for the Period from October 30, 2018 through December 31, 2018* [D.I. 553] pursuant to which the Court approved interim allowance and payment of Blank Rome's compensation totaling \$512,177.50 and reimbursement of expenses totaling \$3,308.62 for the interim period from October 30, 2018 through December 31, 2018.

18. On June 11, 2019, the Court entered the *Order Approving Second Interim Fee Application of Professionals to the Official Committee of Unsecured Creditors for the Period from January 1, 2019 through March 31, 2019* [D.I. 786] pursuant to which the Court approved interim allowance and payment of Blank Rome's compensation totaling \$493,127.00 and reimbursement of expenses totaling \$4,375.44 for the interim period from January 1, 2019 through March 31, 2019.

19. On September 10, 2019, the Court entered the *Order Approving Third Interim Fee Application of Professionals to the Official Committee of Unsecured Creditors for the Period from April 1, 2019 through June 30, 2019* [D.I. 989] pursuant to which the Court approved interim allowance and payment of Blank Rome's compensation totaling \$389,467.25 and reimbursement of expenses totaling \$4,480.48 for the interim period from April 1, 2019 through June 30, 2019.

20. On December 11, 2019, the Court entered the *Order Approving Fourth Interim Fee Application of Professionals to the Official Committee of Unsecured Creditors for the Period from July 1, 2019 through September 30, 2019* [D.I. 1148] pursuant to which the Court approved interim allowance and payment of Blank Rome's compensation totaling \$188,441.00 and reimbursement

of expenses totaling \$5,106.26 for the interim period from July 1, 2019 through September 30, 2019.

21. On March 17, 2020, the Court entered the *Order Approving Fifth Interim Fee Application of Professionals to the Official Committee of Unsecured Creditors for the Period from October 1, 2019 through December 31, 2019* [D.I. 1279] pursuant to which the Court approved interim allowance and payment of Blank Rome's compensation totaling \$296,683.00 and reimbursement of expenses totaling \$2,111.41 for the interim period from October 1, 2019 through December 31, 2019.

22. On June 17, 2020, the Court entered the *Order Approving Sixth Interim Fee Application of Professionals to the Official Committee of Unsecured Creditors for the Period from January 1, 2020 through March 31, 2020* [D.I. 1455] pursuant to which the Court approved interim allowance and payment of Blank Rome's compensation totaling \$190,818.50 and reimbursement of expenses totaling \$404.60 for the interim period from January 1, 2020 through March 31, 2020.

23. On August 12, 2020, the Court entered the *Order Approving Seventh Interim Fee Application of Professionals to the Official Committee of Unsecured Creditors for the Period from April 1, 2020 through June 30, 2020* [D.I. 1567] pursuant to which the Court approved interim allowance and payment of Blank Rome's compensation totaling \$304,797.00 and reimbursement of expenses totaling \$1,202.97 for the interim period from April 1, 2020 through June 30, 2020.

24. Blank Rome did not receive, and is not holding, a retainer in connection with these Restructuring Proceedings. To date, Blank Rome has been paid \$2,396,501.03 for compensation for services rendered and reimbursement of expenses incurred on account of Blank Rome's previously filed monthly and interim fee applications and in accordance with the Administrative Order.

25. 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.

26. 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 authorized Blank Rome to draw upon the knowledge and skills of other firm attorneys and paraprofessionals in a variety of specialties to provide services as the need arose throughout these Restructuring Proceedings.

Customary Disclosures, Budget and Staffing Plan

27. This Final 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*”):³

- (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 Twenty-First Monthly Period and the Final Application Period of the timekeepers (segregated by position) included in this Final Fee Application compared to the average hourly rates for timekeepers in Blank Rome’s domestic United States offices in connection with non-bankruptcy engagements.

³ 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 this Final Fee Application. The foregoing was based exclusively on the facts and circumstances of the Debtors’ Restructuring Proceedings and Blank Rome fully reserves the right to object to such requirements, or any other requirements contained in the U.S. Trustee Guidelines in future cases should it determine that it is appropriate to do so.

- (b) **Exhibit B.1** attached hereto contains a summary of timekeepers for Blank Rome for these Restructuring Proceedings during the Twenty-First Monthly Period.

Exhibit B.2 attached hereto contains a summary of timekeepers for Blank Rome for these Restructuring Proceedings during the Final Application Period.

- (c) **Exhibit C** attached hereto contains Blank Rome's budget during the Final Application Period and Blank Rome's budget and staffing plan during the Twenty-First Monthly Period and the Final Application Period.

Statement Pursuant to U.S. Trustee Guidelines

28. The following is provided in response to the questions set forth in Section C.5 of the U.S. Trustee Guidelines with respect to the fees incurred during the Twenty-First Monthly Period:

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: If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?

Response: Not applicable. See **Exhibit C**.

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 Final Fee Application reflects rate increases as to certain timekeepers since retention. *See* **Exhibit B** attached 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.

Relief Requested

29. Blank Rome submits this Final 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 Final Fee Application, Blank Rome, as counsel to the Committee, requests entry of an order authorizing the allowance on a final basis and payment by the Debtors, to the extent not previously paid, of compensation in the amount of \$2,502,469.25 for professional services rendered and reimbursement of \$21,822.97 for actual and necessary expenses incurred as counsel to the Committee during the Final Application Period, including the allowance and payment of previously unrequested compensation in the amount of \$91,958.00 for services rendered and reimbursement of \$344.19 for actual and necessary expenses incurred as counsel to the Committee during the Twenty-First Monthly Period, all in accordance with the terms of the Administrative Order.

Summary of Fees

30. The total number of hours expended by Blank Rome professionals and paraprofessionals in performing professional services for the Committee (i) during the Twenty-First Monthly Period was 146.00 hours at a blended billing rate of \$629.85 per hour and (ii) during the Final Application Period was 4,172.55 hours at a blended billing rate of \$591.36 per hour. *See*

Exhibit A attached hereto. The value of these services has been computed at the rates Blank Rome customarily charges for similar services provided to other clients.

31. A summary and a detailed chronological itemization of the services rendered by each Blank Rome attorney and paraprofessional during the Twenty-First Monthly Period, calculated by tenths of an hour and categorized in accordance with the appropriate task codes, is attached hereto as **Exhibit D.1**. A summary the services rendered by Blank Rome during the Final Application Period, calculated by tenths of an hour and categorized in accordance with the appropriate task codes, is attached hereto as **Exhibit D.2**. 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.

32. The services rendered by Blank Rome during the Twenty-First Monthly Period included the following, without limitation:

(Task Code 003) Avoidance Action Analysis:

Total Hours: 12.40 Total Fees: \$7,817.50

This category includes Blank Rome's review and analysis of potential avoidance actions and research conducted in relation to same.

(Task Code 007) Claims Administration and Objections:

Total Hours: 2.70 Total Fees: \$1,687.50

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

(Task Code 008) Creditors Committee (Internal/Communication w/Creditors):

Total Hours: 1.30 Total Fees: \$812.50

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

(Task Code 009) Employee Benefits and Pension:

Total Hours: 3.00 Total Fees: \$1,920.00

This category includes Blank Rome's work analyzing employee-related matters and the drafting of a consulting agreement.

(Task Code 013) Fee Applications – Internal:

Total Hours: 24.20 Total Fees: \$12,604.50

This category includes Blank Rome's work preparing its nineteenth monthly (May 2020), twentieth monthly (June 2020), and seventh interim fee applications, as well as other fee application-related papers.

(Task Code 014) Fee Applications – Others:

Total Hours: 18.00 Total Fees: \$9,610.00

This category includes Blank Rome's work preparing and filing Teneo's nineteenth monthly (May 2020), twentieth monthly (June 2020), and seventh interim fee applications, as well as work in connection with the first application for reimbursement of certain Committee member expenses.

(Task Code 019) Litigation:

Total Hours: 5.60 Total Fees: \$4,717.50

This category includes Blank Rome's work reviewing and analyzing litigation issues related to the Williams adversary proceeding, as well as certain issues related to Columbia Gas.

(Task Code 022) Plan and Disclosure Statement:

Total Hours: 78.80 Total Fees: \$52,788.50

This category includes Blank Rome's extensive work reviewing, analyzing, commenting on, negotiating, and researching issues in connection with the plan administrator agreement, post-confirmation items, consummation of the global settlement agreement and various issues related to the occurrence of the plan effective date.

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 Twenty-First Monthly Period. The time records attached hereto as **Exhibit D.1** set forth the specific work performed by Blank Rome in each billing category during the Twenty-First Monthly Period.

**Actual and Necessary Costs and Expenses
Incurred During the Twenty-First Monthly Period**

33. Reimbursement of expenses incurred during the Twenty-First Monthly Period in the amount of \$344.19 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 Twenty-First Monthly Period, and an itemization of each expense within each category, is attached as **Exhibit E.1**. Pursuant to DEL. BANKR. L.R. 2016-2(e)(iii), Blank Rome charged no more than \$0.10 per page for standard photocopies in connection with these Restructuring Proceedings. The actual expenses incurred by Blank Rome in providing professional services were necessary, reasonable and justified under the circumstances to serve the needs of the Committee. Blank Rome reserves the right to

amend or supplement this Final Fee Application to seek reimbursement of any additional expenses incurred by Blank Rome in connection with its performance as counsel to the Committee, as such expenses may not have been captured to date in Blank Rome's billing system as of the filing of this Final Fee Application.

Request for Final Allowance and Payment of Fees and Expenses

34. By this Final Fee Application, Blank Rome hereby requests entry of an order authorizing the allowance on a final basis, and payment by the Debtors to the extent not previously paid, of (i) compensation in the amount of \$2,502,469.25 for professional services rendered as counsel to the Committee during the Final Application Period,⁴ and (ii) reimbursement of \$21,822.97 for expenses incurred as counsel to the Committee during the Final Application Period,⁵ all as requested in this Final Fee Application and in Blank Rome's previously filed Monthly Fee Applications, which are incorporated herein by reference.

**Blank Rome's Requested
Compensation and Reimbursement Should Be Allowed**

35. 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:

⁴ This amount includes \$35,000.00 for estimated fees for work performed after the Effective Date in connection with various post-Effective Date tasks including, without limitation, communications with the Committee and preparation and filing of this Final Fee Application.

⁵ This amount includes \$500.00 for estimated expenses incurred after the Effective Date.

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).

36. Blank Rome respectfully submits that the services for which it seeks compensation in this Final 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

37. In accordance with DEL. BANKR. L.R. 2016-2, a summary schedule of hours and fees for each attorney and paraprofessional during the Twenty-First Monthly Period and the Final Application Period, as well as a summary of the hours and fees categorized by project code during

the Twenty-First Monthly Period and the Final Application Period, is attached hereto at **Exhibit B** and **Exhibit D**, respectively. The undersigned submits that this Final Fee Application complies with DEL. BANKR. L.R. 2016-2.

38. 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.

39. 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

A copy of this Final Fee Application, or notice hereof, has been served upon: (i) the Debtors; (ii) counsel to the Debtors and the Post-Effective Date Debtors; (iii) the Office of the United States Trustee for the District of Delaware; (iv) counsel to North American Pipeline Equipment Company, LLC; (v) counsel to the Plan Administrator; and (vi) all parties requesting notice pursuant to Bankruptcy Rule 2002.

WHEREFORE, Blank Rome respectfully requests that this Court enter an order authorizing the allowance on a final basis and payment by the Debtors, to the extent not previously paid, of compensation in the amount of \$2,502,469.25 for professional services rendered and reimbursement of actual and necessary expenses incurred in the amount of \$21,822.97 as counsel to the Committee during the Final Application Period, including the allowance and payment of previously unrequested compensation in the amount of \$91,958.00 for services rendered and reimbursement of actual and necessary expenses incurred in the amount of \$344.19 as counsel to the Committee the Twenty-First Monthly Period, and such other and further relief that the Court deems just, proper and necessary.

Dated: August 28, 2020
Wilmington, Delaware

BLANK ROME LLP

/s/ Josef W. Mintz
Josef W. Mintz (DE No. 5644)
Jose F. Bibiloni (DE No. 6261)
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*Counsel to the Official Committee of Unsecured
Creditors of Welded Construction, L.P., et al. and
Post-Effective Date Debtors*

**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: Sept. 11, 2020 at 4:00 p.m. (ET)
)	Hearing Date: TBD

**NOTICE OF TWENTY-FIRST MONTHLY AND FINAL 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 JULY 31, 2020**

TO: (I) THE DEBTORS; (II) THE U.S. TRUSTEE; (III) COUNSEL FOR THE DIP LENDER; (IV) COUNSEL FOR THE COMMITTEE (V) COUNSEL TO THE PLAN ADMINISTRATOR; AND (VI) COUNSEL TO THE POST-EFFECTIVE DATE DEBTORS.

PLEASE TAKE NOTICE that on August 28, 2020, Blank Rome LLP (“*Blank Rome*” or “*Applicant*”), counsel to the Official Committee of Unsecured Creditors (the “*Committee*”) of the above-captioned debtors (the “*Debtors*”), filed the *Twenty-First Monthly and Final Application of Blank Rome LLP, Counsel to the Official Committee of Unsecured Creditors of Welded Construction, L.P., et al., for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from October 30, 2018 through July 31, 2020* (“*Final Fee Application*”) with the United States Bankruptcy Court for the District of Delaware (the “*Bankruptcy Court*”), 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801, pursuant to the Court’s Administrative Order.

PLEASE TAKE FURTHER NOTICE that, by the Final Fee Application, Blank Rome seeks the entry of an order authorizing the allowance on a final basis and payment, to the extent not previously paid, of compensation in the amount of \$2,502,469.25 for professional services rendered and reimbursement of actual and necessary expenses incurred in the amount of \$21,822.97 as counsel to the Committee during the aggregate final period from October 30, 2018 through July 31, 2020, including the allowance and payment of previously unrequested compensation in the amount of \$91,958.00 for services rendered and reimbursement of actual and necessary expenses incurred in the amount of \$344.19 as counsel to the Committee during the monthly period from July 1, 2020 through July 31, 2020.

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 to the Application, if any, are required to be filed on or before **September 11, 2020 at 4:00 p.m. (ET)** (the “**Objection Deadline**”) with the Clerk of the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 N. Market Street, Wilmington, Delaware 19801. You must also serve any such objection so as to be received by the following on or before the Objection Deadline: (i) the Debtors, P.O. Box 470, Perrysburg, OH 43552-0470, Attn: Cullen D. Speckhart, Esq. (cspeckhart@cooley.com); (ii) Blank Rome LLP, 130 N. 18th Street, Philadelphia, PA 19102, Attn: Michael B. Schaedle, Esq. (schaedle@BlankRome.com) and John E. Lucian, Esq. (lucian@BlankRome.com) and 1201 N. Market Street, Wilmington, DE 19801, Attn: Josef W. Mintz, Esq. (mintz@BlankRome.com), (iii) Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801, Attn: Sean M. Beach, Esq. (sbeach@ycst.com); and (iv) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Federal Building, 844 North King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Jane M. Leamy, Esq. (jane.m.leafy@usdoj.gov).

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER APPROVAL OF THE FINAL APPLICATION WILL BE HELD BEFORE THE HONORABLE CHRISTOPHER S. SONTCHI IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5TH FLOOR, COURTROOM NO. 6, WILMINGTON, DE 19801 ON A DATE AND TIME TO BE DETERMINED.

PLEASE TAKE FURTHER NOTICE THAT ONLY IF AN OBJECTION IS TIMELY FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, AND SUCH OBJECTION CANNOT BE CONSENSUALLY RESOLVED, WILL A HEARING BE HELD ON THE APPLICATION. THE BANKRUPTCY COURT MAY ENTER AN ORDER APPROVING 100% OF THE FEES AND 100% OF THE EXPENSES REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR A HEARING IF NO OBJECTION IS TIMELY FILED AND SERVED.

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Dated: August 28, 2020
Wilmington, Delaware

BLANK ROME LLP

/s/ Josef W. Mintz

Josef W. Mintz (DE No. 5644)
Jose F. Bibiloni (DE No. 6261)
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Lucian@BlankRome.com

*Counsel to the Official Committee of Unsecured
Creditors of Welded Construction, L.P., et al. and
Co-Counsel to the Post-Effective Date Debtors*

EXHIBIT A**CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES FOR
THE TWENTY-FIRST MONTHLY PERIOD AND FINAL APPLICATION PERIOD
(OCTOBER 30, 2018 THROUGH JULY 31, 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 BILLED		
	NON-BANKRUPTCY ENGAGEMENTS ALL DOMESTIC OFFICES AS OF JANUARY 1, 2020¹	TWENTY-FIRST MONTHLY PERIOD (July 1, 2020 – July 31, 2020)	FINAL APPLICATION PERIOD (October 30, 2018 – July 31, 2020)
Partner	\$821.00	\$677.71	\$745.48
Counsel	\$689.00	N/A	\$577.48
Associate	\$503.00	\$525.13	\$431.96
Paralegal	\$318.00	N/A	\$333.29
Aggregated:	\$673.00 (average)	\$629.85 (blended)	\$591.36 (blended)

¹ This column reflects the average billing rates, rounded to the nearest dollar, as of January 1, 2020, for partners, counsel, associates and paralegals in all of Blank Rome's domestic United States offices in connection with non-bankruptcy engagements.

EXHIBIT B.1

**SUMMARY OF TIMEKEEPERS INCLUDED IN THIS FINAL FEE APPLICATION
DURING THE TWENTY-FIRST MONTHLY PERIOD
(JULY 1, 2020 THROUGH JULY 31, 2020)**

NAME	POSITION	DEPARTMENT	DATE OF FIRST ADMISSION	FEES BILLED	HOURS BILLED	HOURLY RATE		NUMBER OF RATE INCREASES SINCE RETENTION	FEES BILLED USING RATES DISCLOSED AT RETENTION
						In This Final Fee Application	Disclosed at Retention		
Michael B. Schaedle	Partner	Finance, Restructuring and Bankruptcy	Member of NY, PA, and NJ Bars since 1992	\$17,510.00	20.60	\$850.00	\$780.00	2	\$16,068.00
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	\$3,289.50	4.30	\$765.00	\$690.00	2	\$2,967.00
Frederick G. Sandstrom	Partner	Labor & Employment	Member of IL Bar since 2002; Member of DC Bar since 2005; Member of PA Bar since 2012	\$982.50	1.50	\$655.00	N/A	N/A	\$982.50
Josef W. Mintz	Partner	Finance, Restructuring and Bankruptcy	Member of PA and NJ Bars since 2008; Member of DE Bar since 2011	\$46,125.00	73.80	\$625.00	\$535.00	2	\$39,483.00
Bryan J. Hall	Associate	Finance, Restructuring and Bankruptcy	Member of NY Bar since 2012; Member of DE Bar since 2016	\$12,019.00	20.20	\$595.00	N/A	N/A	\$12,019.00

NAME	POSITION	DEPARTMENT	DATE OF FIRST ADMISSION	FEES BILLED	HOURS BILLED	HOURLY RATE		NUMBER OF RATE INCREASES	FEES BILLED USING RATES DISCLOSED
Jose F. Bibiloni	Associate	Finance, Restructuring and Bankruptcy	Member of DE Bar since 2016; Member of PA Bar since 2017	\$12,032.00	25.60	\$470.00	\$355.00	3	\$9,088.00
TOTALS:				\$91,958.00	146.00				\$80,607.50

EXHIBIT B.2

**SUMMARY OF TIMEKEEPERS INCLUDED IN THIS FINAL FEE APPLICATION
DURING THE FINAL APPLICATION PERIOD
(OCTOBER 30, 2018 THROUGH JULY 31, 2020)**

NAME	POSITION	DEPARTMENT	DATE OF FIRST ADMISSION	FEES BILLED	HOURS BILLED	HOURLY RATE		NUMBER OF RATE INCREASES	FEES BILLED USING RATES DISCLOSED AT RETENTION
						In This Final Fee Application	Disclosed at Retention		
Michael B. Schaedle	Partner	Finance, Restructuring and Bankruptcy	Member of NY, PA, and NJ Bars since 1992	\$112,710.00 \$453,681.00 \$214,540.00	144.50 560.10 252.40	\$780.00 \$810.00 \$850.00	\$780.00	2	\$746,460.00
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	\$172,017.00 \$206,813.75 \$24,174.00	249.30 289.25 31.60	\$690.00 \$715.00 \$765.00	\$690.00	2	\$393,403.50
Josef W. Mintz	Partner	Finance, Restructuring and Bankruptcy	Member of PA and NJ Bars since 2008; Member of DE Bar since 2011	\$73,883.50 \$288,762.00 \$177,437.50	138.10 506.60 283.90	\$535.00 \$570.00 \$625.00	\$535.00	2	\$496,801.00
Stanley B. Tarr	Partner	Finance, Restructuring and Bankruptcy	Member of NY Bar since 2005; Member of DE and PA Bars since 2010	\$27,654.00 \$6,255.00	41.90 9.0	\$660.00 \$695.00	\$660.00	1	\$33,594.00
Victoria A. Guilfoyle	Partner	Finance, Restructuring and Bankruptcy	Member of DE Bar since 2008; Member of PA Bar since 2009	\$1,551.50	2.90	\$535.00	\$535.00	0	\$1,551.50

NAME	POSITION	DEPARTMENT	DATE OF FIRST ADMISSION	FEES BILLED	HOURS BILLED	HOURLY RATE		NUMBER OF RATE INCREASES	FEES BILLED USING RATES DISCLOSED AT
Gregory F. Vizza	Partner	Finance, Restructuring and Bankruptcy	Member of PA and NJ Bars since 2007	\$5,292.00 \$575.00	9.80 1.00	\$540.00 \$575.00	\$540.00	1	\$5,832.00
Frederick G. Sandstrom	Partner	Labor & Employment	Member of IL Bar since 2002; Member of DC Bar since 2005; Member of PA Bar since 2012	\$29,768.00 \$3,537.00	48.80 5.40	\$610.00 \$655.00	\$610.00	1	\$33,062.00
Linsey L. Bozzelli	Partner	Corporate, M&A and Securities	Member of PA Bar since 2000	\$3,307.50	4.90	\$695.00	\$695.00	0	\$3,307.50
Andrew Rudolph	Partner	Tax, Benefits and Private Client	Member of PA Bar since 1982	\$5,087.50	5.50	\$925.00	\$925.00	0	\$5,087.50
Erin O'Brien Harkiewicz	Of Counsel	Finance, Restructuring and Bankruptcy	Member of PA and NJ Bars since 1999; Member of NY Bar since 2008	\$17,885.00	24.50	\$730.00	\$730.00	0	\$17,885.00
Michael D. Silberfarb	Of Counsel	Commercial Litigation	Member of NY Bar since 2005; Member of PA Bar since 2014	\$1,440.00	2.40	\$600.00	\$600.00	0	\$1,440.00
Bryan J. Hall	Associate	Finance, Restructuring and Bankruptcy	Member of NY Bar since 2012; Member of DE Bar since 2016	\$30,107.00	50.60	\$595.00	\$595.00	0	\$30,107.00
Jose F. Bibiloni	Associate	Finance, Restructuring and Bankruptcy	Member of DE Bar since 2016; Member of PA Bar since 2017	\$109,908.00 \$159,613.00 \$83,202.00 \$108,758.00	309.60 389.30 198.10 231.40	\$355.00 \$410.00 \$420.00 \$470.00	\$355.00	3	\$400,582.00

NAME	POSITION	DEPARTMENT	DATE OF FIRST ADMISSION	FEES BILLED	HOURS BILLED	HOURLY RATE		NUMBER OF RATE INCREASES	FEES BILLED USING RATES DISCLOSED AT
Matthew E. Kaslow	Associate	Finance, Restructuring and Bankruptcy	Member of NJ Bar since 2015; Member of PA Bar since 2016	\$1,455.50 \$12,920.00 \$41,536.00 \$13,563.00	4.10 30.40 94.40 27.40	\$355.00 \$425.00 \$440.00 \$495.00	\$355.00	3	\$55,486.50
Dominique A. Meyer	Associate	Insurance Recovery	Member of DE Bar since 2017; Member of NY Bar since 2018; District of Columbia Bar since 2019	\$7,350.00	14.70	\$500.00	\$500.00	0	\$7,350.00
Philip M. Guffy	Associate	Finance, Restructuring and Bankruptcy	Member of NY Bar since 2016; Member of TX Bar since 2019	\$2,557.50	5.50	\$465.00	\$465.00	0	\$2,557.50
Adam J. Florek	Associate	General Litigation	Member of IL Bar since 2015; Member of NY Bar since 2018	\$2,662.50	7.10	\$375.00	\$375.00	0	\$2,662.50
Casey L. Klein	Associate	Finance, Restructuring and Bankruptcy	Member of PA Bar since 2017	\$1,088.00	3.20	\$340.00	\$340.00	0	\$1,088.00
Emily R. Anderson	Associate	Finance, Restructuring and Bankruptcy	Member of PA Bar since 2019	\$9,202.00	21.40	\$430.00	\$430.00	0	\$9,202.00
Christopher A. Lewis	Paralegal	Finance, Restructuring and Bankruptcy	N/A	\$14,850.00 \$39,362.50	45.00 117.50	\$330.00 \$335.00	\$330.00	1	\$53,625.00

NAME	POSITION	DEPARTMENT	DATE OF FIRST ADMISSION	FEES BILLED	HOURS BILLED	HOURLY RATE		NUMBER OF RATE INCREASES	FEES BILLED USING RATES DISCLOSED AT
Lisa R. Oriente	Paralegal	Finance, Restructuring and Bankruptcy	N/A	\$80.00	.40	\$200.00	\$200.00	0	\$80.00
Michael Matthews	Project Manager	Litigation Support	N/A	\$1,537.00 \$621.00	5.80 2.30	\$265.00 \$270.00	\$265.00	1	\$2,146.50
Joanna Hudson-Therway	Analyst	Marketing	N/A	\$725.00	2.50	\$290.00	\$290.00	N/A	\$725.00
TOTALS:¹				\$2,467,469.25	4,172.55				\$2,304,035.50

¹ The total fees reflected in the above chart (\$2,467,469.25) exclude the \$35,000.00 post-Effective Date fee estimate requested in the Final Fee Application (*see* Final Fee Application, fn.4).

EXHIBIT C**BUDGET AND STAFFING PLAN****BUDGET:**

Task Code	Task Description	Budgeted Hours	Budgeted Fees	Actual Hours	Actual Fees	% Variance (Fees)
1	Asset Sales / Disposition	350	\$250,000.00	341.8	\$221,294.00	-11%
2	Assumption and Rejection of Leases and Contracts	30	\$16,000.00	25.3	\$12,595.50	-21%
3	Avoidance Action Analysis	125	\$70,000.00	94.7	\$51,030.00	-27%
4	Budgeting (Case)	5	\$3,000.00	0.2	\$156.00	-95%
5	Business Operations	20	\$12,000.00	14.1	\$8,418.50	-30%
6	Case Administration (General)	175	\$100,000.00	154.5	\$75,366.00	-25%
7	Claims Administration and Objections	200	\$145,000.00	184.4	\$120,228.50	-17%
8	Creditors Committee	450	\$275,000.00	428.3	\$241,426.00	-12%
9	Employee Benefits and Pension	175	\$115,000.00	144.2	\$92,650.50	-19%
10	Employment/Retention Applications – Internal	30	\$12,000.00	23.2	\$10,013.50	-17%
11	Employment/Retention Applications – Others	50	\$25,000.00	37.6	\$16,894.50	-32%

12	Executory Contracts/Leases	250	\$170,000.00	235.6	\$149,255.00	-12%
13	Fee Applications – Internal	300	\$135,000.00	287.7	\$127,671.00	-5%
14	Fee Applications – Others	130	\$65,000.00	121.5	\$54,172.00	-17%
15	Financing and Cash Collateral	300	\$200,000.00	280.9	\$169,841.50	-15%
16	Insurance Issues	100	\$65,000.00	81.7	\$52,791.50	-19%
17	Investigation of Company	700	\$450,000.00	684.6	\$406,371.50	-10%
18	Investigation of Liens	5	\$3,000.00	0.7	\$351.00	-88%
19	Litigation	275	\$175,000.00	263.8	\$158,645.00	-9%
20	Non-Working Travel (Billing at 1/2 Actual Time)	30	\$20,000.00	20.65	\$13,421.75	-33%
21	Omnibus Court Hearings	75	\$40,000.00	57.4	\$31,625.00	-21%
22	Plan and Disclosure Statement	700	\$500,000.00	633.6	\$425,269.50	-15%
24	Relief from Stay and Adequate Protection	80	\$40,000.00	55.7	\$27,767.50	-31%
25	Reporting (OUST)	5	\$3,000.00	0.4	\$214.00	-93%
TOTAL:		4560	\$2,889,000.00	4172.55	\$2,467,469.25	-15%

STAFFING PLAN:¹**Period from October 30, 2018 through September 30, 2019:**

CATEGORY OF TIMEKEEPER	NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER DURING THE BUDGET PERIOD	AVERAGE HOURLY RATE
Partners	2	\$715 – \$747
Counsel	1	\$552.50
Associates	1	\$430
Paralegals	1	\$335

Period from October 1, 2019 through July 31, 2020:

CATEGORY OF TIMEKEEPER	NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER DURING THE BUDGET PERIOD	AVERAGE HOURLY RATE
Partners	3	\$746.67
Counsel	0	N/A
Associates	1	\$470
Paralegals	0	N/A

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 89.8% of the total final compensation requested in this Final Fee Application. As further set forth in the Blank Rome Employment Application and this Final Fee Application, Blank Rome has drawn upon the knowledge and skills of other firm attorneys and paraprofessionals to provide services as the need arose.

EXHIBIT D.1**SUMMARY AND DETAILS OF FEES REQUESTED IN THIS FINAL FEE APPLICATION
DURING TWENTY-FIRST MONTHLY PERIOD, CATEGORIZED BY TASK CODE
(JULY 1, 2020 THROUGH JULY 31, 2020)**

TASK CODE	TASK DESCRIPTION	NUMBER OF HOURS	AMOUNT OF FEES
003	Avoidance Action Analysis	12.40	\$7,817.50
007	Claims Administration and Objections	2.70	\$1,687.50
008	Creditors Committee (Internal/Communications w/Creditors)	1.30	\$812.50
009	Employee Benefits and Pension	3.00	\$1,920.00
013	Fee Applications – Internal	24.20	\$12,604.50
014	Fee Applications – Others	18.00	\$9,610.00
019	Litigation	5.60	\$4,717.50
022	Plan and Disclosure Statement	78.80	\$52,788.50
TOTALS:		146.00	\$91,958.00

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: AUGUST 28, 2020
 MATTER NO. 154278-01600 04015
 INVOICE NO. 1914255

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

FOR LEGAL SERVICES RENDERED THROUGH JULY 31, 2020

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
TASK: 003 AVOIDANCE ACTION ANALYSIS					
07/17/20	NOTES TO AND FROM ASK FINANCIAL REGARDING POSSIBLE PREFERENCE PROGRAM	SCHAEDELE, MICHAEL	003	0.30	255.00
07/20/20	DISCUSS PLAN ADMINISTRATION ISSUE (PREFERENCE MATTERS) WITH J. STEINFELD, E. NEIGER AND J. MINTZ	SCHAEDELE, MICHAEL	003	0.30	255.00
07/23/20	REVIEW ASK PREFERENCE ANALYSIS AND RELATED TENEQ MATERIAL	SCHAEDELE, MICHAEL	003	0.70	595.00
07/27/20	REVIEW AND COMMENT ON ASK ENGAGEMENT LETTER	MINTZ, JOSEF	003	0.70	437.50
07/28/20	CALL WITH J. MINTZ RE ANALYSIS OF CHAPTER 5 ACTIONS AND GAME PLAN THROUGH FILING OF COMPLAINTS	HALL, BRYAN	003	0.80	476.00
07/28/20	REVIEW PREFERENCE REVIEW AND DILIGENCE (0.7); CALL WITH B. HALL REGARDING SAME (0.8)	MINTZ, JOSEF	003	1.50	937.50
07/29/20	BEGIN WORK ON ANALYSIS OF LARGEST POTENTIAL PREFERENCE TARGETS AND PROPOSED ACTION PLAN, IDENTIFY PHASE 1 LIST OF POTENTIAL TARGETS (.5), BEGIN REVIEW OF DPAS FOR POTENTIAL RELEASES (2.0), AND BEGIN DRAFTING SUMMARY OF SAME (.7)	HALL, BRYAN	003	3.20	1,904.00

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS
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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
07/30/20	CONTINUE ANALYZING CUSTOMER COMPLETION AGREEMENTS FOR PHASE 1 PREFERENCE ANALYSIS (1.2); REVIEW SURETY RELEASES AND EMAILS FROM J. MINTZ (1.0); COMPLETE DRAFTING OF SUMMARY OF PHASE 1 POTENTIAL PREFERENCE TARGETS (.9); AND EMAIL TO AND CALL WITH J. MINTZ RE SAME (0.4)	HALL, BRYAN	003	3.50	2,082.50
07/30/20	ATTENTION TO AVOIDANCE ACTION ANALYSIS (.5); EMAILS WITH B. HALL (.3); CALL WITH B. HALL REGARDING SAME (.4); UPDATE TO M. SCHAEDEL REGARDING SAME (.2)	MINTZ, JOSEF	003	1.40	875.00
	003 AVOIDANCE ACTION ANALYSIS			12.40	7,817.50
TASK: 007 CLAIMS ADMINISTRATION AND OBJECTIONS					
07/02/20	REVIEW UPDATED CLAIMS REGISTER (.3); EMAILS WITH TENEO REGARDING SAME (.2)	MINTZ, JOSEF	007	0.50	312.50
07/07/20	EMAIL TO C. SPECKHART REGARDING CLAIMS REGISTER (.2); EMAIL TO A. STEPANYANTS REGARDING SAME (.2)	MINTZ, JOSEF	007	0.40	250.00
07/09/20	CALL WITH A. STEPANYANTS REGARDING CLAIMS REGISTER	MINTZ, JOSEF	007	0.40	250.00
07/14/20	REVIEW AND COMMENT ON MOTION TO APPROVE SETTLEMENT OF CHUBB 503(B) (9) CLAIM (1.2); EMAILS WITH DEBTORS' COUNSEL REGARDING SAME (.2)	MINTZ, JOSEF	007	1.40	875.00
	007 CLAIMS ADMINISTRATION AND OBJECTIONS			2.70	1,687.50
TASK: 008 CREDITORS COMMITTEE (INTERNAL/COMMUNICATION W/CREDITC					
07/14/20	DRAFT AND SEND EMAIL TO COMMITTEE REGARDING TENEO COMPLETION FEE	MINTZ, JOSEF	008	0.80	500.00
07/21/20	PARTICIPATE IN CALL ON EFFECTIVE DATE STATUS	MINTZ, JOSEF	008	0.50	312.50
	008 CREDITORS COMMITTEE (INTERNAL/COMMUNICATION W/CREI			1.30	812.50
TASK: 009 EMPLOYEE BENEFITS AND PENSION					
07/10/20	CORRESPOND WITH J. MINTZ REGARDING REVIEW OF CONSULTANT ENGAGEMENT AGREEMENT	SANDSTROM, FREDERICK	009	0.10	65.50
07/13/20	CORRESPOND WITH J. MINTZ REGARDING ANALYSIS OF DRAFT CONSULTANT RETENTION AGREEMENT	SANDSTROM, FREDERICK	009	0.10	65.50

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
07/14/20	REVIEW AND REVISE DRAFT CONSULTANT RETENTION AGREEMENT AND CORRESPOND WITH J. MINTZ REGARDING SAME	SANDSTROM, FREDERICK	009	1.30	851.50
07/27/20	REVIEW FINAL PAYROLL AND PTO PAYMENTS (.5); REVIEW WAGE ORDER (.4); REVIEW DOCUMENTS (.2)	MINTZ, JOSEF	009	1.10	687.50
07/28/20	REVIEW AND CONSIDER REQUEST FOR INFORMATION FROM BECHTEL ON CENTRAL STATES CLAIM	MINTZ, JOSEF	009	0.40	250.00
	009 EMPLOYEE BENEFITS AND PENSION			3.00	1,920.00
TASK: 013 FEE APPLICATIONS - INTERNAL					
07/01/20	WORK ON BLANK ROME'S JUNE 2020 MONTHLY FEE APPLICATION (20TH).	BIBILONI, JOSE	013	0.20	94.00
07/01/20	WORK ON BLANK ROME'S MAY 2020 MONTHLY FEE APPLICATION (19TH).	BIBILONI, JOSE	013	0.80	376.00
07/01/20	PREPARE AND FINALIZE BLANK ROME APRIL 2020 MONTHLY FEE APPLICATION (18TH), E-FILE, AND COORDINATE SERVICE OF SAME.	BIBILONI, JOSE	013	2.50	1,175.00
07/01/20	REVIEW APRIL FEE APPLICATION (.4); EMAIL TO J. BIBILONI REGARDING SAME (.1)	MINTZ, JOSEF	013	0.50	312.50
07/02/20	PREPARE BLANK ROME'S MAY 2020 MONTHLY FEE APPLICATION (19TH)	BIBILONI, JOSE	013	2.80	1,316.00
07/02/20	EMAILS WITH J. MINTZ AND J. BIBILONI RE MAY 2020 AND JUNE 2020 MONTHLY FEE APPLICATIONS (.5); BEGIN DRAFTING TWENTIETH MONTHLY FEE APPLICATION (1.0); BEGIN PREPARING EXHIBITS AND RESPONSES TO U.S. TRUSTEE GUIDELINES (1.7)	HALL, BRYAN	013	3.20	1,904.00
07/02/20	WORK ON JUNE FEE APPLICATION	MINTZ, JOSEF	013	0.30	187.50
07/02/20	WORK ON MAY FEE APPLICATION	MINTZ, JOSEF	013	0.30	187.50
07/03/20	FINALIZE BLANK ROME'S MAY 2020 MONTHLY FEE APPLICATION (19TH), E-FILE, AND COORDINATE SERVICE OF SAME	BIBILONI, JOSE	013	0.40	188.00

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
07/03/20	INITIAL WORK ON BLANK ROME'S FINAL FEE APPLICATION	BIBILONI, JOSE	013	0.40	188.00
07/06/20	REVIEW DRAFT BLANK ROME JUNE 2020 MONTHLY FEE APPLICATION AND EMAILS WITH B. HALL AND J. MINTZ RE SAME.	BIBILONI, JOSE	013	0.40	188.00
07/06/20	WORK ON BLANK ROME'S FINAL FEE APPLICATION.	BIBILONI, JOSE	013	0.70	329.00
07/06/20	FINALIZE, FILE AND SERVE TWENTIETH MONTHLY (JUNE 2020) FEE APPLICATION	HALL, BRYAN	013	0.50	297.50
07/06/20	CONTINUE WORK ON JUNE 2020 DRAFT MONTHLY FEE APPLICATION	HALL, BRYAN	013	1.20	714.00
07/06/20	WORK ON JUNE FEE APPLICATION	MINTZ, JOSEF	013	0.30	187.50
07/09/20	EMAILS RE: FINAL FEE APPS	LUCIAN, JOHN	013	0.20	153.00
07/10/20	ATTENTION TO FINAL FEE APPLICATION MATTERS.	BIBILONI, JOSE	013	0.20	94.00
07/13/20	PREPARE BLANK ROME'S SEVENTH INTERIM FEE APPLICATION.	BIBILONI, JOSE	013	1.00	470.00
07/14/20	FURTHER PREPARE BLANK ROME'S SEVENTH INTERIM FEE APPLICATION.	BIBILONI, JOSE	013	2.80	1,316.00
07/15/20	WORK ON BLANK ROME'S SEVENTH INTERIM FEE APPLICATION.	BIBILONI, JOSE	013	1.20	564.00
07/16/20	FURTHER WORK ON BLANK ROME SEVENTH INTERIM FEE APPLICATION.	BIBILONI, JOSE	013	1.00	470.00
07/16/20	ANALYZE AND RESPOND TO J. MINTZ RE INTERIM FEE APPLICATIONS	HALL, BRYAN	013	0.20	119.00
07/16/20	ATTENTION TO FEE APPLICATIONS	MINTZ, JOSEF	013	0.50	312.50
07/17/20	FURTHER WORK ON BLANK ROME'S SEVENTH INTERIM FEE APPLICATION AND EMAILS WITH J. MINTZ AND B. HALL RE SAME.	BIBILONI, JOSE	013	0.90	423.00
07/17/20	REVIEW AND COMMENT ON BLANK ROME SEVENTH INTERIM AND BUDGET (.4); EMAILS WITH J. BIBILONI REGARDING SAME (.2)	MINTZ, JOSEF	013	0.60	375.00

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
07/21/20	DISCUSS WITH J. MINTZ BLANK ROME INTERIM FEE APPLICATION (.1); FILE AND SERVE SAME (.4)	HALL, BRYAN	013	0.50	297.50
07/22/20	FOLLOW UP ON FEE APPLICATIONS AND VARIOUS CASE ADMINISTRATION MATTERS	HALL, BRYAN	013	0.10	59.50
07/24/20	ATTENTION TO FEE APPLICATIONS	MINTZ, JOSEF	013	0.30	187.50
07/28/20	PREPARE, FILE, AND CIRCULATE CNO FOR BLANK ROME JUNE 2020 MONTHLY FEE APPLICATION	HALL, BRYAN	013	0.20	119.00
	013 FEE APPLICATIONS - INTERNAL			24.20	12,604.50
TASK: 014 FEE APPLICATIONS - OTHERS (INCLUDES REVIEW AND OBJECTIONS					
07/01/20	FINALIZE TENEO'S APRIL 2020 MONTHLY FEE APPLICATION (18TH), E-FILE, AND COORDINATE SERVICE OF SAME.	BIBILONI, JOSE	014	1.00	470.00
07/02/20	PREPARE TENEO'S MAY 2020 MONTHLY FEE APPLICATION (19TH)	BIBILONI, JOSE	014	0.50	235.00
07/02/20	REVISE AND FINALIZE WELDED COMMITTEE EXPENSE REIMBURSEMENT APPLICATION, FILE AND SERVE SAME	HALL, BRYAN	014	1.00	595.00
07/03/20	ATTENTION TO COMMITTEE PROFESSIONAL FEE ISSUES	BIBILONI, JOSE	014	0.50	235.00
07/03/20	FINALIZE TENEO'S MAY 2020 MONTHLY FEE APPLICATION (19TH), E-FILE, AND COORDINATE SERVICE OF SAME	BIBILONI, JOSE	014	0.90	423.00
07/06/20	ATTENTION TO TENEO'S JUNE 2020 MONTHLY FEE APPLICATION.	BIBILONI, JOSE	014	0.20	94.00
07/07/20	EMAILS WITH J. MINTZ RE TENEO FEE APPLICATIONS.	BIBILONI, JOSE	014	0.10	47.00
07/07/20	EMAIL TO A. MIELKE REGARDING FEE APPLICATION MATTERS	MINTZ, JOSEF	014	0.30	187.50
07/08/20	ATTENTION TO TENEO'S JUNE MONTHLY FEE APPLICATION AND DISCUSS SAME WITH F. SOTO.	BIBILONI, JOSE	014	0.30	141.00
07/08/20	CALL WITH A. MIELKE REGARDING FEE APPLICATIONS (.2); FOLLOW UP (.2)	MINTZ, JOSEF	014	0.40	250.00

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07/09/20	EMAILS WITH J. MINTZ RE TENEO FEE APPLICATIONS.	BIBILONI, JOSE	014	0.10	47.00
07/09/20	PREPARE TENEO JUNE MONTHLY FEE APPLICATION.	BIBILONI, JOSE	014	0.70	329.00
07/09/20	CALL WITH A. STEPANYANTS REGARDING TENEO COMPLETION FEE (.2); REVIEW DOCUMENTS (.2); EMAILS WITH J. LUCIAN REGARDING SAME (.2)	MINTZ, JOSEF	014	0.60	375.00
07/14/20	CALL WITH F. SOTO RE TENEO JUNE MONTHLY FEE APPLICATION.	BIBILONI, JOSE	014	0.30	141.00
07/15/20	PREPARE TENEO'S JUNE MONTHLY FEE APPLICATION.	BIBILONI, JOSE	014	0.60	282.00
07/16/20	EMAILS WITH J. MINTZ AND B. HALL RE STATUS OF THE COMMITTEE PROFESSIONALS' FEE APPLICATIONS.	BIBILONI, JOSE	014	0.40	188.00
07/16/20	CALL WITH F. SOTO RE TENEO'S JUNE MONTHLY FEE APPLICATION AND SEVENTH INTERIM FEE APPLICATION AND WORK ON SAME.	BIBILONI, JOSE	014	1.10	517.00
07/17/20	PREPARE TENEO SEVENTH INTERIM FEE APPLICATION.	BIBILONI, JOSE	014	0.40	188.00
07/17/20	FURTHER ATTENTION TO TENEO JUNE MONTHLY FEE APPLICATION AND EMAILS WITH B. HALL AND J. MINTZ RE SAME.	BIBILONI, JOSE	014	1.80	846.00
07/20/20	EMAIL TO J. MINTZ RE TENEO JUNE MONTHLY AND SEVENTH INTERIM FEE APPLICATIONS.	BIBILONI, JOSE	014	0.20	94.00
07/20/20	REVIEW AND REVISE TENEO JUNE 2020 MONTHLY FEE APPLICATION (.5); PREPARE DRAFT OF TENEO SEVENTH MONTHLY FEE APPLICATION (1.0)	HALL, BRYAN	014	1.50	892.50
07/20/20	REVIEW TENEO JUNE MONTHLY FEE APPLICATION	MINTZ, JOSEF	014	0.40	250.00
07/20/20	REVIEW TENEO INTERIM FEE APPLICATION	MINTZ, JOSEF	014	0.40	250.00
07/21/20	ATTENTION TO TENEO AND BLANK ROME FEE APPLICATION FILINGS.	BIBILONI, JOSE	014	0.30	141.00

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
07/21/20	UPDATE TENEO TWENTIETH MONTHLY AND SEVENTH INTERIM FEE APPLICATIONS AND CIRCULATE FOR REVIEW (.5); CALL WITH ANDRIY STEPANYANTS, TENEO, AND UPDATE TWENTIETH MONTHLY (.2); CALL WITH J. MINTZ RE FEE APPLICATIONS (.2); FILE AND SERVE TENEO FEE APPLICATIONS (.8)	HALL, BRYAN	014	1.70	1,011.50
07/24/20	DRAFT CNO FOR COMMITTEE MEMBER EXPENSE REIMBURSEMENT APPLICATION	HALL, BRYAN	014	0.20	119.00
07/24/20	PREPARE FOUR CERTIFICATES OF NO OBJECTION FOR MONTHLY APPLICATIONS (.7); FILE SAME (.3); SUMMARIZE AMOUNTS TO PAY AND EMAIL TO A. MIELKE (.3); EMAILS WITH J. MINTZ RE SAME (.2)	HALL, BRYAN	014	1.50	892.50
07/24/20	ATTENTION TO APPLICATIONS OF COMMITTEE MEMBERS (.2); ATTENTION TO APPLICATION OF TENEO (.2)	MINTZ, JOSEF	014	0.40	250.00
07/27/20	FOLLOW UP ON PENDING MATTERS, UPCOMING FILING AND OBJECTION DEADLINES, AND CALENDAR SAME	HALL, BRYAN	014	0.20	119.00
014 FEE APPLICATIONS - OTHERS (INCLUDES REVIEW AND OBJECTI				18.00	9,610.00
TASK: 019 LITIGATION					
07/21/20	REVIEW DISCOVERY MOTION AGAINST WILLIAMS AND PROVIDE COMMENTS TO SAME	LUCIAN, JOHN	019	0.50	382.50
07/22/20	ADDITIONAL REVIEW OF COLUMBIA GAS RELATED PAPERS (1.8); REVIEW STATUS OF WILLIAMS LITIGATION AND CERTAIN PAPERS (2.1)	SCHAEDLE, MICHAEL	019	3.90	3,315.00
07/23/20	REVIEW COLUMBIA GAS DOCUMENTS AND MATERIAL	SCHAEDLE, MICHAEL	019	1.20	1,020.00
019 LITIGATION				5.60	4,717.50
TASK: 022 PLAN AND DISCLOSURE STATEMENT					
07/01/20	CONTINUE WORKING ON EFFECTIVE DATE TASK LIST (1.2); EMAILS WITH A. MIELKE REGARDING CALL AND TRANSITION MEMO (.2); EMAIL TO TENEO REGARDING SAME (.1); CALL WITH M. SCHAEDELE REGARDING SAME (.3)	MINTZ, JOSEF	022	1.80	1,125.00

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07/01/20	NOTE TO AND FROM A. MIELKE AND OTHERS REGARDING PLAN ADMINISTRATION ACTION PLAN	SCHAEDLE, MICHAEL	022	0.10	85.00
07/01/20	DISCUSS PLAN ADMINISTRATION ACTION PLAN WITH J. MINTZ	SCHAEDLE, MICHAEL	022	0.50	425.00
07/02/20	CONTINUE WORKING ON LIQUIDATION AGENDA/DASHBOARD AHEAD OF PLAN EFFECTIVE DATE (2.7); REVIEW OF STATUS VARIOUS OPEN ITEMS IN CASES REGARDING SAME (1.7);	MINTZ, JOSEF	022	4.40	2,750.00
07/02/20	NOTES TO AND FROM J. MINTZ AND A. MIELKE ON PLAN ADMINISTRATOR MATTERS	SCHAEDLE, MICHAEL	022	0.30	255.00
07/02/20	DISCUSS PLAN ADMINISTRATOR MATTERS WITH J. MINTZ	SCHAEDLE, MICHAEL	022	0.50	425.00
07/02/20	REVIEW REVISED DASHBOARD FROM	SCHAEDLE, MICHAEL	022	1.00	850.00
07/03/20	REVIEW UPDATED WELDED AGENDA SENT BY J. MINTZ	BIBILONI, JOSE	022	0.30	141.00
07/03/20	EMAILS REGARDING TRANSITION MEMO (.2); REVIEW MEMO (.4)	MINTZ, JOSEF	022	0.60	375.00
07/03/20	REVIEW TRANSITION MEMO/DASHBOARD	SCHAEDLE, MICHAEL	022	1.00	850.00
07/04/20	REVIEW TRANSITION MEMORANDUM SENT BY A. MIELKE (YCST)	BIBILONI, JOSE	022	0.40	188.00
07/06/20	REVIEW TRANSITION MEMO (.4); CALL WITH C. SPECKHART REGARDING POST-CONFIRMATION MATTERS AND TRANSITION (.5); EMAIL TO TENEO REGARDING SAME (.2)	MINTZ, JOSEF	022	1.10	687.50
07/06/20	NOTE TO AND FROM C. SPECKHART AND J. MINTZ ON YCST TRANSITION MEMO	SCHAEDLE, MICHAEL	022	0.20	170.00
07/06/20	REVIEW PLAN ADMINISTRATOR DASHBOARD	SCHAEDLE, MICHAEL	022	0.50	425.00
07/06/20	REVIEW YCST TRANSITION MEMO	SCHAEDLE, MICHAEL	022	0.50	425.00
07/07/20	COMMUNICATIONS WITH J. MINTZ AND C. SPECKHART RE PLAN ADMINISTRATOR AGENDA.	BIBILONI, JOSE	022	0.20	94.00

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
07/07/20	UPDATE PLAN ADMINISTRATOR DASHBOARD (.5); EMAIL TO C. SPECKHART REGARDING SAME (.2)	MINTZ, JOSEF	022	0.70	437.50
07/09/20	EMAILS RE: PLAN ADMINISTRATOR ITEMS	LUCIAN, JOHN	022	0.20	153.00
07/09/20	REVIEW DOCUMENTS (.2); EMAIL TO B. SCOTT REGARDING PLAN ADMINISTRATOR BOND (.4)	MINTZ, JOSEF	022	0.60	375.00
07/09/20	WORK ON CONSULTING AGREEMENT FOR POST-EFFECTIVE DATE DEBTORS	MINTZ, JOSEF	022	0.60	375.00
07/09/20	DETAILED REVIEW OF TRANSITION MEMO (1.6); EMAIL TO C. SPECKHART REGARDING TRANSITION MATTERS (.5)	MINTZ, JOSEF	022	2.10	1,312.50
07/10/20	CONFERENCE CALL WITH DEBTORS TO REVIEW TRANSITION MATTERS FOR PLAN ADMINISTRATOR	LUCIAN, JOHN	022	1.50	1,147.50
07/10/20	EMAILS WITH C. SPECKHART REGARDING POST-EFFECTIVE DATE MATTERS	MINTZ, JOSEF	022	0.70	437.50
07/10/20	UPDATE PLAN ADMINISTRATOR AGENDA (2); EMAIL TO CASE TEAM REGARDING SAME (.2)	MINTZ, JOSEF	022	2.20	1,375.00
07/10/20	WORK ON CONSULTING AGREEMENT FOR POST-EFFECTIVE DATE DEBTORS (1.4); EMAIL TO C. SPECKHART REGARDING SAME (.2); EMAIL TO G SANDSTROM REGARDING SAME (.2); EMAIL TO J. KRZYSZTOFIK REGARDING SAME (.4)	MINTZ, JOSEF	022	2.20	1,375.00
07/10/20	PREPARE FOR (1.0) AND PARTICIPATE IN CALL WITH ESTATE PROFESSIONALS CONCERNING TRANSITION MATTERS (1.5)	MINTZ, JOSEF	022	2.50	1,562.50
07/11/20	REVIEW TRANSITION MEMO AND PLAN ADMINISTRATOR DASHBOARD	HALL, BRYAN	022	0.50	297.50
07/13/20	NOTES TO AND FROM C. SPECKHART AND J. MINTZ REGARDING PLAN ADMINISTRATION AND EFFECTIVE DATE OCCURRENCE	SCHAEDELE, MICHAEL	022	0.40	340.00
07/14/20	EMAILS REGARDING GLOBAL SETTLEMENT PAYMENT	MINTZ, JOSEF	022	0.30	187.50

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07/14/20	EMAILS WITH J. KRYZSTOFIK REGARDING CONSULTING AGREEMENT (.3); REVIEW REVISED AGREEMENT (.5); EMAILS WITH G. SANDSTROM (.2)	MINTZ, JOSEF	022	1.00	625.00
07/14/20	UPDATE PLAN ADMINISTRATOR DASHBOARD (.5); EMAIL TO DEBTORS' COUNSEL REGARDING TRACKER (.4); CALL WITH M. SCHAEDEL REGARDING SAME (.4)	MINTZ, JOSEF	022	1.30	812.50
07/14/20	DISCUSS ACTION PLAN FOR EFFECTIVE DATE AND PLAN ADMINISTRATOR WITH J. MINTZ	SCHAEDEL, MICHAEL	022	1.00	850.00
07/15/20	CALL WITH C. SPECKHART AND J. KRYZSTOFIK (.5); REVISE CONSULTING AGREEMENT (.5); EMAIL TO C. SPECKHART (.3) AND J. KRYZSTOFIK REGARDING SAME (.3)	MINTZ, JOSEF	022	1.60	1,000.00
07/15/20	ATTEND TO VARIOUS PLAN ADMINISTRATION MATTERS	SCHAEDEL, MICHAEL	022	3.10	2,635.00
07/16/20	ATTENTION TO EFFECTIVE DATE MATTERS	LUCIAN, JOHN	022	0.20	153.00
07/16/20	ATTENTION TO EFFECTIVE DATE TASKS	MINTZ, JOSEF	022	2.00	1,250.00
07/17/20	PARTICIPATE IN TRANSITION CALL WITH DEBTOR AND PLAN ADMINISTRATOR; EMAILS WITH ASK FINANCIAL	LUCIAN, JOHN	022	0.70	535.50
07/17/20	FOLLOW UP ON PLAN ADMINISTRATORS BOND	MINTZ, JOSEF	022	0.80	500.00
07/17/20	REVIEW AND COMMENT ON PLAN RESERVES (.5); CALL WITH A. STEPANYANTS REGARDING SAME (.4)	MINTZ, JOSEF	022	0.90	562.50
07/17/20	PREPARE FOR (.6) AND ATTEND STATUS CALL ON EFFECTIVE DATE TASKS (.5); EMAILS WITH A. MIELKE REGARDING SAME (.5)	MINTZ, JOSEF	022	1.60	1,000.00
07/17/20	REVIEW KCC PROPOSAL FOR DISBURSEMENT AGENT SERVICES (.6); CALL WITH C. SPECKHART REGARDING SAME (.5); INQUIRIES TO US BANK AND EAST WEST FOR COMPARISONS (1.0)	MINTZ, JOSEF	022	2.10	1,312.50

WELDED CONSTRUCTION, L.P. UNSECURED CREDITORS
COMMITTEE

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
07/17/20	DISCUSS EFFECTIVE DATE OCCURRENCE CONDITIONS WITH YCST, ALIX, TENEO, C. SPECKHART AND BR TEAM	SCHAEDLE, MICHAEL	022	0.70	595.00
07/20/20	EMAILS WITH A. STEPANYANTS REGARDING TENEO ENGAGEMENT LETTER BY PLAN ADMINISTRATOR	MINTZ, JOSEF	022	0.30	187.50
07/20/20	FOLLOW UP WITH C. SPECKHART REGARDING BOND	MINTZ, JOSEF	022	0.30	187.50
07/20/20	PARTICIPATE IN CALL WITH US BANK REGARDING POTENTIAL ENGAGEMENT WITH PLAN ADMINISTRATOR	MINTZ, JOSEF	022	0.50	312.50
07/20/20	REVIEW RESERVES (.3); EMAILS WITH A. STEPANYANTS REGARDING SAME (.2)	MINTZ, JOSEF	022	0.50	312.50
07/20/20	EMAILS WITH J. KRZYSZTOFIK REGARDING BANK ACCOUNTS (.3); EMAIL TO C. SPECKHART REGARDING SAME (.3)	MINTZ, JOSEF	022	0.60	375.00
07/20/20	CALL WITH J. KRYZSTOFIK REGARDING CONSULTING AGREEMENT (.4); REVISE AGREEMENT (.5); AND EMAILS WITH C. SPECKHART REGARDING SAME (.3); EMAILS WITH J. KRYZSTOFIK REGARDING SAME (.3)	MINTZ, JOSEF	022	1.50	937.50
07/20/20	REVISE PLAN ADMINISTRATOR AGREEMENT	MINTZ, JOSEF	022	1.50	937.50
07/21/20	PARTICIPATE IN PLAN TRANSITION CALL WITH YCST AND ATTENTION TO EMAILS RE: SAME	LUCIAN, JOHN	022	0.50	382.50
07/21/20	REVIEW YOUNG CONAWAY ENGAGEMENT LETTER FOR PLAN ADMINISTRATOR	MINTZ, JOSEF	022	0.40	250.00
07/21/20	REVIEW TENEO ENGAGEMENT LETTER FOR PLAN ADMINISTRATOR	MINTZ, JOSEF	022	1.20	750.00
07/21/20	REVIEW ALIX ENGAGEMENT LETTER FOR PLAN ADMINISTRATOR	MINTZ, JOSEF	022	1.20	750.00
07/21/20	CALLS WITH USBANK REGARDING DISBURSEMENT AGENT PROPOSAL; (1.0) REVIEW PROPOSAL AND CONSIDER ISSUES (.5); EMAILS WITH C. SPECKHART REGARDING SAME (.4);	MINTZ, JOSEF	022	1.90	1,187.50

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AUGUST 28, 2020

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
07/21/20	DISCUSS SATISFACTION OF EFFECTIVE DATE CONDITIONS WITH WORKING GROUP, INCLUDING J. MINTZ AND C. SPECKHART	SCHAEDLE, MICHAEL	022	0.50	425.00
07/21/20	REVIEW PLAN ADMINISTRATION MATTERS AND CONSIDER ACTION PLAN	SCHAEDLE, MICHAEL	022	2.50	2,125.00
07/22/20	REVIEW AND COMMENT ON DRAFT NOTICE OF EFFECTIVE DATE	HALL, BRYAN	022	0.20	119.00
07/22/20	ATTENTION TO EFFECTIVE DATE MATTERS (1.5); NUMEROUS CALLS REGARDING SAME (.5); REVIEW BANK TRANSITION DOCUMENTS (.5); UPDATE TO C. SPECKHART REGARDING SAME (.5)	MINTZ, JOSEF	022	3.00	1,875.00
07/22/20	DISCUSS EFFECTIVE DATE OCCURRENCE ISSUES WITH J. MINTZ	SCHAEDLE, MICHAEL	022	0.50	425.00
07/23/20	ATTENTION TO EFFECTIVE DATE MATTERS (.5); REVIEW AND REVISE ALIX ENGAGEMENT LETTER (.5); REVIEW AND REVISE TENEO ENGAGEMENT LETTER (.4); EMAILS REGARDING ENGAGEMENT LETTERS (.3)	MINTZ, JOSEF	022	1.70	1,062.50
07/24/20	REVIEW CONDITIONS TO EFFECTIVE DATE OCCURRENCE WITH J. MINTZ	SCHAEDLE, MICHAEL	022	0.40	340.00
07/27/20	EMAILS TO A. MIELKE REGARDING RESERVES	MINTZ, JOSEF	022	0.40	250.00
07/27/20	SEVERAL EMAILS TO J. KRYZSZTOFIK REGARDING TRANSITION MATTERS (.5); CALL WITH J. KRYZSZTOFIK REGARDING SAME (.2);	MINTZ, JOSEF	022	0.70	437.50
07/27/20	CALL WITH A. STEPANYANTS REGARDING TRANSITION MATTERS AND TENEO POST-EFFECTIVE DATE ROLE (.5); CONSIDER ISSUES REGARDING SAME (.4)	MINTZ, JOSEF	022	0.90	562.50
07/28/20	REVIEW REVISED ALIX ENGAGEMENT LETTER FOR PLAN ADMINISTRATOR	MINTZ, JOSEF	022	0.40	250.00
07/29/20	ATTENTION TO PLAN ADMINISTRATOR MATTERS AND REVIEW WITH MINTZ	LUCIAN, JOHN	022	0.30	229.50
07/29/20	REVIEW AND COMMENT ON ASK ENGAGEMENT LETTER	MINTZ, JOSEF	022	0.50	312.50

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
07/29/20	CALL WITH C. SPECKHART REGARDING INSURANCE FOR PLAN ADMINISTRATOR (.3); CALL WITH J. LUCIAN REGARDING SAME (.2)	MINTZ, JOSEF	022	0.50	312.50
07/29/20	REVIEW AND COMMENT ON ALIX PARTNERS ENGAGEMENT LETTER	MINTZ, JOSEF	022	0.50	312.50
07/29/20	REVIEW AND COMMENT ON KCC DISBURSEMENT AGENT SERVICES AGREEMENT	MINTZ, JOSEF	022	1.70	1,062.50
07/30/20	ATTENTION TO PLAN TRANSITION MATTERS	LUCIAN, JOHN	022	0.20	153.00
07/30/20	ATTENTION TO EFFECTIVE DATE MATTERS (2.5) REVIEW PLAN ADMINISTRATOR ENGAGEMENT MATTERS (.5); UPDATE PLAN ADMINISTRATOR AGREEMENT (.5); WORK ON CONSULTANT RETENTION (.4); EMAILS REGARDING SAME (1.0)	MINTZ, JOSEF	022	4.90	3,062.50
07/31/20	ATTEND TO OCCURRENCE OF EFFECTIVE DATE (1.4); REVIEW NOTICE OF EFFECTIVE DATE (.3); ATTEND EFFECTIVE DATE CLOSING CALL (.5); DRAFT AND SEND DETAILED EMAIL MEMORANDUM TO COMMITTEE REGARDING OCCURRENCE OF EFFECTIVE DATE (1.0)	MINTZ, JOSEF	022	3.20	2,000.00
07/31/20	VARIOUS REPORTS FROM J. MINTZ ON STATUS OF EFFECTIVE DATE OCCURRENCE	SCHAEDLE, MICHAEL	022	0.50	425.00
	022 PLAN AND DISCLOSURE STATEMENT			78.80	52,788.50
	TOTAL SERVICES			\$	91,958.00

FOR DISBURSEMENTS ADVANCED THROUGH JULY 31, 2020

DATE	DESCRIPTION	AMOUNT
06/28/2020	MISCELLANEOUS COURT COST: JOSEF MINTZ TELEPHONIC APPEARANCE RE: HEARING ON AMENDED CH. 11 PLAN. ON 06/28/20	43.50
07/08/2020	LEXIS -MINTZ, JOSEF/DOC ACCESS	91.20
07/13/2020	LEXIS -MINTZ, JOSEF/ACCESS CHARGE	23.76

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DATE	DESCRIPTION	AMOUNT
07/14/2020	RELIABLE COPY SERVICE- WILMINGTON TRANSCRIPT FOR JUNE 24, 2020, HEARING BEFORE J. SONTCHI	57.60
07/15/2020	WESTLAW BIBILONI,JOSE	30.03
	DOCKET SEARCHES	34.50
	HAND DELIVERY - PARCELS	15.00
	REPRODUCTION OF DOCUMENTS	59.60
TOTAL DISBURSEMENTS		\$ 355.19

CURRENT INVOICE TOTAL **\$ 92,313.19**

TIME AND FEE SUMMARY

TIMEKEEPER	RATE	HOURS	FEES
BRYAN J. HALL	595.00	20.20	12,019.00
FREDERICK G. SANDSTROM	655.00	1.50	982.50
JOHN E. LUCIAN	765.00	4.30	3,289.50
JOSE F. BIBILONI	470.00	25.60	12,032.00
JOSEF W. MINTZ	625.00	73.80	46,125.00
MICHAEL B. SCHAEDELE	850.00	20.60	17,510.00
TOTALS		146.00	\$ 91,958.00

EXHIBIT D.2

**SUMMARY OF FEES REQUESTED IN THIS FINAL FEE APPLICATION DURING
FINAL APPLICATION PERIOD, CATEGORIZED BY TASK CODE
(OCTOBER 30, 2018 THROUGH JULY 31, 2020)**

TASK CODE	TASK DESCRIPTION	NUMBER OF HOURS	AMOUNT OF FEES
001	Asset Sales / Disposition	341.80	\$221,294.00
002	Assumption and Rejection of Leases and Contracts	25.30	\$12,595.50
003	Avoidance Action Analysis	94.70	\$51,030.00
004	Budgeting (Case)	0.20	\$156.00
005	Business Operations	14.10	\$8,418.50
006	Case Administration (General)	154.50	\$75,366.00
007	Claims Administration and Objections	184.40	\$120,228.50
008	Creditors Committee	428.30	\$241,426.00
009	Employee Benefits and Pension	144.20	\$92,650.50
010	Employment/Retention Applications – Internal	23.20	\$10,013.50
011	Employment/Retention Applications – Others	37.60	\$16,894.50
012	Executory Contracts / Leases	235.60	\$149,255.00
013	Fee Applications – Internal	287.70	\$127,671.00
014	Fee Applications – Others	121.50	\$54,172.00
015	Financing and Cash Collateral	280.90	\$169,841.50
016	Insurance Issues	81.70	\$52,791.50
017	Investigation of Company	684.60	\$406,371.50
018	Investigation of Liens	0.70	\$351.00

TASK CODE	TASK DESCRIPTION	NUMBER OF HOURS	AMOUNT OF FEES
019	Litigation	263.80	\$158,645.00
020	Non-Working Travel (Billed at ½ Actual Time)	20.65	\$13,421.75
021	Omnibus Court Hearings	57.40	\$31,625.00
022	Plan and Disclosure Statement	633.60	\$425,269.50
024	Relief from Stay and Adequate Protection	55.70	\$27,767.50
025	Reporting (OUST)	0.40	\$214.00
TOTALS:¹		4,172.55	\$2,467,469.25

¹ See **Exhibit B.2**, fn. 1.

EXHIBIT E.1

**SUMMARY AND DETAILS OF EXPENSE REIMBURSEMENT
REQUESTED DURING TWENTY-FIRST MONTHLY PERIOD, BY CATEGORY
(JULY 1, 2020 THROUGH JULY 31, 2020)**

EXPENSE CATEGORY	SERVICE PROVIDER	TOTAL EXPENSES
Reproduction of Documents	In-house / Parcels Inc.	\$59.60
Docket Searches	PACER	\$34.50
Legal Research	Westlaw / Lexis	\$144.99
Telephonic Court Appearance	CourtCall, LLC	\$43.50
Transcripts	Reliable	\$57.60
Local Courier Service	Parcels Inc.	\$15.00
SUBTOTAL:		\$355.19
ADJUSTMENT:		(\$11.00)¹
TOTAL EXPENSES REQUESTED:		\$344.19

¹ In reconciling Blank Rome's interim fee applications and this Final Fee Application, Blank Rome noticed an inadvertent overpayment of \$11.00 resulting from a typographical error in its Fourth Interim Fee Application [D.I. 1104]. In the Fourth Interim Fee Application, the total expenses requested were \$5,106.26, when the actual expenses incurred were \$5,095.26. To correct this, Blank Rome has reduced the total expenses sought by \$11.00.

EXHIBIT E.2**SUMMARY OF EXPENSE REIMBURSEMENT REQUESTED
DURING FINAL APPLICATION PERIOD, BY CATEGORY
(OCTOBER 30, 2018 THROUGH JULY 31, 2020)**

EXPENSE CATEGORY	SERVICE PROVIDER	TOTAL EXPENSES
Reproduction of Documents	In-House & Parcels, Inc.	\$3,117.91
Local Courier Service / Hand Delivery	Parcels, Inc.	\$163.50
Courier Service	Federal Express	\$41.80
Mailing/Postage	In-House & Parcels, Inc.	\$212.05
Document Scanning / Imaging	Internal	\$125.00
Transcripts	Reliable	\$169.20
Legal Research	Westlaw / Lexis	\$10,116.02
Docket Searches	PACER	\$3,023.10
Telephonic Appearance	CourtCall, LLC	\$395.75
Filing Fee (<i>Pro Hac Vice</i>)	U.S. District Court, D. Del.	\$25.00
Travel Expenses	Hotel	\$455.57
Travel Expenses	Car Rental	\$363.93
Travel Expenses	Meals	\$35.72
Travel Expenses	Parking	\$176.90
Travel Expenses	Tolls	\$10.00
Travel Expenses	Mileage	\$58.00
Travel Expenses	Transportation (Air Fare)	\$1,845.80
Travel Expenses	Transportation (Cab Fare)	\$120.72
Travel Expenses	Transportation (Train Fare)	\$878.00
Estimated Post-Effective Date Expenses ¹		\$500.00
TOTAL:²		\$21,822.97

¹ See Final Fee Application, fn 5.² The total expenses reflected (\$21,822.97) includes the \$11.00 reduction described in **Exhibit E.1**, fn. 1.

CERTIFICATE OF SERVICE

I, Josef W. Mintz, hereby certify that on August 28, 2020, I served or caused to be served the foregoing *Twenty-First Monthly and Final 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 July 31, 2020*, including notice thereof (the “**Notice**”), upon the following persons via U.S. first-class mail, postage fully pre-paid:

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PLAN ADMINISTRATOR
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I further certify that on August 28, 2020, I served or caused to be served the Notice upon the persons or entities listed on the attached service list via U.S. first-class mail, postage fully pre-paid.

/s/ Josef W. Mintz
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