

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

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In re: : Chapter 11  
: :  
WELDED CONSTRUCTION, L.P., *et al.*, : Case No. 18-12378 (CSS)  
: :  
Debtors.<sup>1</sup> : (Jointly Administered)  
: :  
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**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF PAPERS**

*PLEASE TAKE NOTICE* that pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and sections 102(1), 342 and 1109(b) of the United States Bankruptcy Code, 11 U.S.C. §§ 101, *et seq.*, Blank Rome LLP hereby appears as counsel to the reorganized debtors, Welded Construction, L.P. and Welded Construction Michigan, LLC (collectively the “Post-Effective Date Debtors”) in the above-captioned bankruptcy cases. The Post-Effective Date Debtors hereby request that all notices given or required to be given in these cases and all papers served or required to be served in these cases, be given to and served upon the following:

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*PLEASE TAKE FURTHER NOTICE* that the foregoing request includes the notices and papers referred to in Bankruptcy Rule 2002, and also includes, without limitation, orders and

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Welded Construction, L.P. (5008) and Welded Construction Michigan, LLC (9830). The mailing address for each of the Debtors is P.O. Box 470, Perrysburg, OH 43552-0470.



notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, facsimile, or otherwise, which affect or seeks to affect in any way the Post-Effective Date Debtors or their property, or any of the rights or interests held or asserted by the Post-Effective Date Debtors or their property.

***PLEASE TAKE FURTHER NOTICE*** that this request shall not be deemed or construed to be a waiver of any substantive or procedural rights of the Post-Effective Date Debtors, including without limitation, to: (a) challenge the jurisdiction of this Court to adjudicate any matter, including, without limitation, any non-core matter; (b) require that where any adversary proceeding is to be initiated against the Post-Effective Date Debtors in these cases or any related case or where any proceeding is to be initiated by complaint against the Post-Effective Date Debtors under applicable non-bankruptcy law, service shall be made on the Post-Effective Date Debtors in accordance with applicable Bankruptcy Rules, the Federal Rules of Civil Procedure, and applicable non-bankruptcy law and that service upon undersigned counsel is insufficient for such purposes; (c) have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware; (d) trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; (e) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (f) any other rights, claims, actions, defenses, setoffs or recoupments to which the Post-Effective Date Debtors are or may be entitled in law or at equity, all of which rights, claims, actions, defenses, setoffs or recoupments the Post-Effective Date Debtors expressly reserve and assert.

Dated: August 31, 2020

**BLANK ROME LLP**

Wilmington, Delaware

/s/ Josef W. Mintz

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*Counsel to the Post-Effective Date Debtors*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2020, I served or caused to be served the foregoing *Notice of Appearance and Request for Service of Papers* by CM/ECF upon those parties registered to receive such electronic notifications in these cases.

/s/ Josef W. Mintz  
Josef W. Mintz (DE No. 5644)