

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

In re:

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

Debtors.

Chapter 11

Case No. 18-12378 (CSS)

(Jointly Administered)

WELDED CONSTRUCTION, L.P.,

Plaintiff,

v.

GWINNUP'S RESTORATION AND
ENVIRONMENTAL SERVICES, INC.,

Defendant.

Adv. Proc. No. 20-50930 (CSS)

NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned attorneys with the law firm Barnes & Thornburg LLP hereby enter their appearances in the above-captioned case as counsel for Gwinnup's Restoration and Environmental Services, Inc. ("Gwinnup's") and request that any and all notices given or required to be given in the above-captioned jointly administered cases, and all papers served or required to be served in the cases, be served upon them at the following addresses, and that they each be added to any related service list or mailing matrix on file with the Clerk of the Bankruptcy Court:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand filed in this matter, whether transmitted or conveyed by ECF filing, mailing, hand delivery, telephone, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, all notices required to be served under any and all of the provisions of the Bankruptcy Code and Bankruptcy Rules 2002, 9007, and 9010.

Neither this Appearance nor any subsequent pleading, proof of claim, or other writing or conduct shall constitute a waiver by the party for which this Appearance has been made of any (a) rights to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court; (b) rights to trial by jury in any proceeding as to any and all matters so triable; (c) rights to have the reference in this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and (d) other rights, claims, defenses, setoffs, or other matters. All such rights hereby are reserved and preserved on behalf of Gwinnup, without exemption and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these cases.

Dated: December 8, 2020
Wilmington, Delaware

BARNES & THORNBURG LLP

/s/ Kevin G. Collins

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CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2020, I caused a copy of the foregoing *Notice of Appearance and Demand for Service of Papers* to be served by electronic means on all parties requesting service through the Court's ECF system and by email on counsel listed below.

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