

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

In re	)	Chapter 11
	)	
Welded Construction, L.P., <i>et al.</i> ,	)	Case No.: 18-12378 (CSS)
	)	
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	
Welded Construction, L.P.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
The Voto Manufacturers Sales Company,	)	Adv. Pro. No. 20-50956 (CSS)
	)	
Defendant.	)	

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the law firm set forth below appears as counsel for “The Voto Manufacturers Sales Company” (“Defendant” and/or “Voto”), in the above-captioned Chapter 11 bankruptcy case and above-captioned adversary proceeding, and pursuant to Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Section 1109(b) of Title 11 of the United States Code, as amended (the “Bankruptcy Code”), request that the following name and address be added to the mailing list maintained by the Clerk of Court and Debtors’ counsel in this case and further demand that all notices given or required to be given in this case and all papers served or required to be served in this case by all counsel, parties-in-interest, and this Court be given to and served upon the following counsel:

Robert Wm. Pedigo, Esquire (DE. No. 4047)  
Cooch and Taylor, P.A.

<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).



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The Nemours Building  
1007 N. Orange Street, Suite 1120  
P.O. Box 1690  
Wilmington, DE 19899-1680  
Phone: 302-984-3832  
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**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and Bankruptcy Code set forth above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted, conveyed by mail, hand delivery, telephone, telegraph, facsimile, e-mail or otherwise, which affects any of the Debtors or property of the Debtors or the rights of creditors and parties-in-interest such as Creditor.

**PLEASE TAKE FURTHER NOTICE** that Defendant “The Voto Manufacturers Sales Company” does not intend that this Notice of Appearance and Request for Service of Papers or any later appearance or pleading be deemed or construed to be a waiver of its right: (i) to have final orders in non-core matters entered only after de novo review by a District Judge; (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; and (iv) to any other rights, claims, actions, setoffs, or recoupments to which it is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments Creditor expressly reserves.

COOCH AND TAYLOR, PA

/s/ Robert W. Pedigo

Robert Wm. Pedigo, Esquire (DE. No. 4047)

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Dated: December 8, 2020

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Debtors. <sup>1</sup>	)	(Jointly Administered)
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<hr style="width: 40%; margin-left: 0;"/> Welded Construction, L.P.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
The Voto Manufacturers Sales Company,	)	Adv. Pro. No. 20-50956 (CSS)
	)	
Defendant.	)	

**CERTIFICATE OF SERVICE**

I, Robert W. Pedigo, Esquire hereby certify that on the 8<sup>th</sup> day of December 2020, I caused the foregoing **Notice of Appearance and Request for Service of Papers** to be served via electronic service on the parties requesting ECF notification.

Respectfully submitted,

COOCH AND TAYLOR, PA

/s/ Robert W. Pedigo  
Robert Wm. Pedigo, Esquire (DE. No. 4047)  
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