

**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)	
_____)	(Jointly Administered)
)	
WELDED CONSTRUCTION, L.P.,)	
)	
Plaintiff)	Adv. Pro. No. 20-50954
)	
vs.)	
)	
US CROSSINGS UNLIMITED, LLC,)	
)	
Defendant.)	Objection Deadline: March 5, 2022 @ 4:00 p.m. Hearing Date: March 9, 2022 @ 11:00 a.m.

**MOTION OF COOCH AND TAYLOR, P.A. AND JOHN D. EDDY, ESQUIRE
TO WITHDRAW AS COUNSEL FOR DEFENDANT US CROSSING UNLIMITED, LLC**

Cooch and Taylor, P.A. and John D. Eddy, Esquire (collectively “Counsel”) hereby moves this Court pursuant to Local Rule of Civil Practice and Procedure 83.7 of the United States District Court for the District of Delaware and Rule 9010-2 of the Local Rules of the United States Bankruptcy Court for the District of Delaware for entry of the attached Order allowing the withdrawal of their appearance as counsel for Defendant US Crossings Unlimited, LLC (the “Defendant”) in this matter (the “Motion”). In support of this Motion, Counsel states as follows:

1. Defendant has failed substantially in its obligations to Counsel, is uncooperative, making it unreasonably difficult for Counsel to continue the representation. Specifically, Defendant has failed to respond to communications by Counsel, making it impossible for Counsel



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to continue its representation of Defendant and to honor its obligations to this Court.

2. On May 27, 2021, Counsel filed an Answer to the Complaint [D.I. 18] to prevent the Defendant from being in default, even though, the Defendant was exhibiting major non-communication issues at that time.

3. Counsel was advised on or about December 7, 2021, that Defendant is either no longer in business or going out of business. Counsel advised Defendant of the consequences of a default judgment, but Defendant once again went incommunicado.

4. For many months, Defendant has failed to respond to voice mails, sometimes several voice mails per week, has failed to respond to many emails. Since October 2021, Counsel has been unable to schedule mediation for the Defendant.

5. Pursuant to Rule 83.7 of the Local Rule of Civil Practice and Procedure of the United States District Court for the District of Delaware and Rule 9010-2 of the Local Rules of the United States Bankruptcy Court for the District of Delaware governing withdrawal of attorneys, Counsel have filed this Motion, served it by first class and Certified Mail, return receipt requested, upon Defendant at its last known address, and further, served a copy of the Motion upon Plaintiff's counsel.

6. WHEREFORE, Counsel respectfully requests that the Court enter the Order, attached hereto as "Exhibit A", allowing their withdrawal as counsel for the Defendant.

Date: February 18, 2022
Wilmington, Delaware

Respectfully submitted,

/s/ Robert W. Pedigo
Robert W. Pedigo, (DSB# 4047)
COOCH AND TAYLOR, P.A.
The Nemours Building
1007 N. Orange Street, Suite 1120

P.O. Box 1680
Wilmington, DE 19899-1680
Phone: 302.984.3832
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and

John D. Eddy, Esquire
Pa. I.D. No. 32150
Manor Building Penthouse
564 Forbes Avenue
Pittsburgh, PA 15219
(412) 281-5336
eddy@pghlaw.com.

Counsel for US Crossings Unlimited, LLC

EXHIBIT A

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WELDED CONSTRUCTION, L.P.,)	
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Plaintiff)	Adv. Pro. No. 20-50954
)	
vs.)	
)	
US CROSSINGS UNLIMITED, LLC,)	
)	
Defendant.)	

**ORDER GRANTING MOTION OF COOCH AND TAYLOR, P.A. AND
JOHN D. EDDY, ESQUIRE TO WITHDRAW AS COUNSEL
FOR DEFENDANT US CROSSING UNLIMITED, LLC
AND REQUIRING DEFENDANT TO RETAIN SUBSTITUTE COUNSEL**

AND NOW, upon consideration of Cooch and Taylor, P.A. and John D. Eddy, Esquire's (collectively, "Counsel") Motion to Withdraw as Counsel for Defendant US Crossings Unlimited, LLC (the "Motion"), and the Court, having found that notice of the Motion and the hearing on the Motion, if any were required, were proper under the applicable Federal Rules of Bankruptcy Procedure and the local rules of the Court, and having found that Counsel has demonstrated good cause for the relief sought in the Motion;

IT IS HEREBY ORDERED that the Motion is **GRANTED** and withdrawal of Cooch and Taylor, P.A. and John D. Eddy, Esquire is **APPROVED**;

IT IS FURTHER ORDERED that Defendant US Crossings Unlimited, LLC (the "Defendant"), being an entity that is not permitted under applicable law to represent itself in civil litigation, shall promptly retain substitute counsel who must serve and file notice of appearance as

counsel for the Defendant in this proceeding within thirty (30) days of the date of this Order; and

IT IS FURTHER ORDERED that if substitute counsel does not serve and file notice of appearance for the Defendant in this proceeding as required by this Order, the Plaintiff shall be, and hereby is, authorized to file a request for entry of default and entry of judgment by default against the Defendant without further notice.

BY THE COURT:

DATED: _____, 2022

THE HONORABLE CHRISTOPHER S. SONTCHI
United States Bankruptcy Judge

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Plaintiff)	Adv. Pro. No. 20-50954
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vs.)	
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US CROSSINGS UNLIMITED, LLC,)	
)	
Defendant.)	Objection Deadline: March 5, 2022
		@ 4:00 p.m.
		Hearing Date: March 9, 2022
		@ 11:00 a.m.

NOTICE OF MOTION

TO: The Persons on the Attached Service List

The undersigned counsel has filed the attached MOTION OF COOCH AND TAYLOR, P.A. AND JOHN D. EDDY, ESQUIRE TO WITHDRAW AS COUNSEL FOR DEFENDANT US CROSSING UNLIMITED, LLC.

If you disagree with the relief requested, you are required to file a response to the attached Motion on or before **March 5, 2022 at 4:00 p.m.**

At the same time, you must also serve a copy of the response upon the undersigned counsel:

Robert W. Pedigo, Esq.
Cooch and Taylor, P.A.
The Brandywine Building
1000 West Street, 10th Floor
Wilmington, DE 19801

IF OBJECTIONS ARE FILED, A HEARING ON THE MOTION WILL BE HELD ON MARCH 9, 2022 at 11:00 A.M. BEFORE THE HONORABLE CHRISTOPHER S. SONTCHI, CHIEF UNITED STATES BANKRUPTCY JUDGE, UNITED STATES

**BANKRUPTCY COURT, 824 N. MARKET STREET, 5TH FLOOR, COURTROOM 6,
WILMINGTON, DE 19801.**

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY
GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR
HEARING.

Dated: February 18, 2022
Wilmington, DE

COOCH AND TAYLOR, P.A.

/s/ Robert W. Pedigo
Robert W. Pedigo (#4047)
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Plaintiff)	
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vs.)	
)	
US CROSSINGS UNLIMITED, LLC,)	Adv. No. 20-50954
)	
Defendant)	

CERTIFICATE OF SERVICE

I, Robert W. Pedigo, Esquire certify that on February 18, 2022, caused the attached documents, Motion to Withdraw as Counsel, to be served on the parties, via the ECF email notice, and on the attached service list in the manner indicated.

COOCH AND TAYLOR, P.A.

/s/ Robert W. Pedigo
Robert W. Pedigo, (DSB# 4047)
The Nemours Building
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Wilmington, DE 19899-1680
Phone: 302.984.3832
Fax: 302.984.3939
rpedigo@coochtaylor.com

Counsel for US Crossings Unlimited, LLC

Dated: February 18, 2022

SERVICE LIST:

VIA REGULAR MAIL, EMAIL AND CERTIFIED MAIL RETURN RECEIPT REQUESTED:

Michael Lind, Manager or Other Corporate Officer
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20436 Route 19
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Email: mike.lind@blackrockpipeline.com

VIA EMAIL:

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