

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

In re:)	Chapter 11
)	
WELDED CONSTRUCTION, L.P., et al.)	
)	Case No. 18-12378 (CSS)
Debtors)	
)	(Jointly Administered)
)	
WELDED CONSTRUCTION, L.P.,)	
)	
Plaintiff)	Adv. Pro. No. 20-50954
)	
vs.)	
)	
US CROSSINGS UNLIMITED, LLC,)	
)	
Defendant.)	

**CERTIFICATION OF COUNSEL REGARDING MOTION OF COOCH AND TAYLOR,
P.A. AND JOHN D. EDDY, ESQUIRE TO WITHDRAW AS COUNSEL FOR
DEFENDANT US CROSSING UNLIMITED, LLC [Adv. D.I. 25]**

The undersigned hereby certifies that on February 18, 2022, counsel filed the “MOTION OF COOCH AND TAYLOR, P.A. AND JOHN D. EDDY, ESQUIRE TO WITHDRAW AS COUNSEL FOR DEFENDANT US CROSSING UNLIMITED, LLC” [Adv. D.I. 25], and no objections have been filed by the Objection Deadline of March 5, 2022.

It is respectfully requested that the Exhibit A proposed form of order attached hereto be entered at the earliest convenience of the Court.

March 7, 2022
Wilmington, Delaware

COOCH AND TAYLOR, P.A.

/s/ Robert W. Pedigo
Robert W. Pedigo, (DSB# 4047)
The Nemours Building
1007 N. Orange Street, Suite 1120
P.O. Box 1680
Wilmington, DE 19899-1680



1812378220307000000000004

Phone: 302.984.3832
Fax: 302.984.3939
rpedigo@coochtaylor.com

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
WELDED CONSTRUCTION, L.P., et al.)	
)	Case No. 18-12378 (CSS)
Debtors)	
)	(Jointly Administered)
)	
WELDED CONSTRUCTION, L.P.,)	
)	
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