

**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 (LSS)
: :
Debtors.¹ : (Jointly Administered)
: :
: **Re: D.I. 1928**
: :

**CERTIFICATE OF NO OBJECTION REGARDING
POST-EFFECTIVE DATE DEBTORS’ OBJECTION TO CLAIM NO. 597 PURSUANT
TO SECTION 502 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3007**

The undersigned hereby certifies as follows:

On June 16, 2023, the above-captioned debtors and debtors in possession (together, the “Debtors” and, following the Effective Date, the “Post-Effective Date Debtors”), through Cullen D. Speckhart, solely in her capacity as Plan Administrator, filed the *Post-Effective Date Debtors’ Objection to Claim No. 597 Pursuant to Section 502 of the Bankruptcy Code and Bankruptcy Rule 3007* [D.I. 1928] (the “Objection”). Pursuant to the notice of Objection, the deadline for filing and service of objections or responses to the Objection was June 30, 2023 at 4:00 p.m. (ET) (the “Response Deadline”).

The undersigned is aware of no pending formal or informal objection or response to the Objection. The undersigned further certifies that he has caused a review of the Court’s docket in these cases and no objection or response to the Objection appears thereon.

Accordingly, the undersigned respectfully requests entry of the proposed form of Order sustaining the Objection attached hereto as **Exhibit 1** (which form of order remains unchanged

¹ 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 c/o P.O. Box 470, Perrysburg, OH 43552-0470.



from the form of order filed with the Objection, except the caption has been updated) at the earliest convenience of the Court.

Dated: July 5, 2023
Wilmington, Delaware

BLANK ROME LLP

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Counsel to the Post-Effective Date Debtors

EXHIBIT 1

**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 (LSS)
: :
Debtors.¹ : (Jointly Administered)
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: **Re: D.I. 1928**

**ORDER SUSTAINING POST-EFFECTIVE DATE DEBTORS' OBJECTION TO
CLAIM NO. 597 PURSUANT TO SECTION 502 OF THE
BANKRUPTCY CODE AND BANKRUPTCY RULE 3007**

Upon consideration of the *Post-Effective Date Debtors' Objection to Claim No. 597 Pursuant to Section 502 of the Bankruptcy Code and Bankruptcy Rule 3007* (the "Objection")²; and it appearing that this Court has jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; and it appearing that venue of these chapter 11 cases and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having determined that the relief requested in the Objection is in the best interests of the Post-Effective Date Debtors, their estates, their creditors and other parties in interest; and it appearing that notice of the Objection was good and sufficient upon the particular circumstances and that no other or further notice need be given; and upon the record herein; and after due deliberation thereon and good and sufficient cause appearing therefor; it is hereby **ORDERED, ADJUDGED, AND DECREED THAT:**

1. The Objection is SUSTAINED, as set forth herein.

¹ 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.

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Objection.

2. The Disputed Claim identified on Exhibit A to the Order is hereby disallowed and expunged.

3. Any and all rights of the Post-Effective Date Debtors and their estates to amend, supplement, or otherwise modify the Objection and to file additional objections to any and all claims filed in these chapter 11 cases, including, without limitation, the Disputed Claim shall be reserved. Any and all rights, claims and defenses of the Post-Effective Date Debtors and their estates with respect to the Disputed Claim shall be reserved, and nothing included in or omitted from the Objection is intended or shall be deemed to impair, prejudice, waive or otherwise affect any rights, claims, or defenses of the Debtors and their estates with respect to the Disputed Claim.

4. KCC is authorized and directed to expunge the Disputed Claim from the official claims register in these chapter 11 cases.

5. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

EXHIBIT A
Disputed Claim

No.	Name	Date Claim Filed	Claim Number	Asserted Claim Amount	Asserted Claim Class	Reason for Disallowance
1	Cleveland Brothers Equipment Co., Inc.	2/28/2019	597	\$123,780.68 \$11,085,486.9	Administrative Secured Priority General Unsecured	Claim fully satisfied pursuant to the Settlement Agreement entered into by the Debtors and Claimant.