

**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.¹ : (Jointly Administered)
: :
: **Re: D.I. 1929**
: :

**CERTIFICATE OF NO OBJECTION REGARDING
POST-EFFECTIVE DATE DEBTORS' MOTION TO FILE UNDER SEAL
POSTEFFECTIVE 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’ Motion to File Under Seal Post-Effective Date Debtors’ Objection to Claim No. 597 Pursuant to Section 502 of the Bankruptcy Code and Bankruptcy Rule 3007 [D.I. 1929]* (the “Motion”). Pursuant to the notice of Motion, the deadline for filing and service of objections or responses to the Motion was June 30, 2023 at 4:00 p.m. (ET) (the “Objection Deadline”).

The undersigned is aware of no pending formal or informal objection or response to the Motion. 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 Motion appears thereon.

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

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.



filed with the Motion, except the caption has been updated) at the earliest convenience of the Court.

Dated: July 5, 2023
Wilmington, Delaware

BLANK ROME LLP

/s/ Josef W. Mintz

Josef W. Mintz (DE No. 5644)

Lawrence R. Thomas III (DE No. 6935)

1201 Market Street, Suite 800

Wilmington, Delaware 19801

Telephone: (302) 425-6400

Facsimile: (302) 425-6464

E-mail: Josef.Mintz@BlankRome.com

Lorenzo.Thomas@BlankRome.com

-and-

Michael B. Schaedle (*pro hac vice*)

John E. Lucian (*pro hac vice*)

One Logan Square

130 N. 18th Street

Philadelphia, Pennsylvania 19103

Telephone: (215) 569-5500

Facsimile: (215) 569-5555

Email: Mike.Schaedle@BlankRome.com

John.Lucian@BlankRome.com

Counsel to the Post-Effective Date Debtors

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 (LSS)
: :
Debtors. ¹ : (Jointly Administered)
: :
: **Re: D.I. 1929**

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

Upon the motion (the "Motion")² of 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, for entry of this Order authorizing, but not directing, Post-Effective Date Debtors to redact confidential information in *Post-Effective Date Debtors' Objection to Claim No. 597 Pursuant to Section 502 of the Bankruptcy Code and Bankruptcy Rule 3007* (the "Claim Objection") designated as confidential pursuant to the Seal Orders [D.I. 211, 393, 480]; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012; and consideration of the Motion and the relief requested therein being a core proceeding in accordance with 28 U.S.C. § 157(b)(2); and venue being proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion

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.

² Capitalized terms not otherwise defined herein shall have the meanings assigned to them in the Motion.

being adequate and appropriate under the particular circumstances; and upon the record of all proceedings had before the Court; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtor's estate, its creditors and other parties in interest and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and any objections to the requested relief having been withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor,

ACCORDINGLY, IT IS HEREBY ORDERED THAT:

1. The Motion is granted. Any objections, whether filed or not, to the relief requested by the Motion are hereby overruled with prejudice.
2. Post-Effective Date Debtors are authorized to redact confidential information in the Claim Objection. Post-Effective Date Debtors shall provide an unredacted version of the Claim Objection and any other applicable filed documents to the Court, Cleveland Brothers Equipment Co., Inc., and the Office of the U.S. Trustee.
3. Post-Effective Date Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.
4. The Court retains jurisdiction with respect to all matters arising from or related to the interpretation or implementation of this Order.