

**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. 1998**
: :

**CERTIFICATE OF NO OBJECTION REGARDING
POST-EFFECTIVE DATE DEBTORS’ MOTION FOR AN ORDER,
PURSUANT TO BANKRUPTCY RULES 9006 AND 9027,
(I) EXTENDING THE PERIOD WITHIN WHICH TO REMOVE
ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND (II) EXTENDING THE
DEADLINE TO OBJECT TO CLAIMS FILED AGAINST THE DEBTORS**

The undersigned hereby certifies as follows:

On July 1, 2024, 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 for an Order, Pursuant to Bankruptcy Rules 9006 and 9027, (I) Extending the Period Within Which to Remove Actions Pursuant to 28 U.S.C. § 1452 and (II) Extending the Deadline to Object to Claims Filed Against the Debtors* [D.I. 1998] (the “Motion”). Pursuant to the notice of Motion, the deadline for filing and service of objections or responses to the Motion was July 15, 2024 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.

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.



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

Dated: July 16, 2024
Wilmington, Delaware

BLANK ROME LLP

/s/ Lawrence R. Thomas III
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. 1998**

**ORDER, PURSUANT TO BANKRUPTCY RULES
9006 AND 9027, (I) EXTENDING THE PERIOD WITHIN WHICH TO
REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND (II) EXTENDING THE
DEADLINE TO OBJECT TO CLAIMS FILED AGAINST THE DEBTORS**

Upon consideration of the motion (the “Motion”)² of the Post-Effective Date Debtors for entry of an order, pursuant to Bankruptcy Rules 9006 and 9027, (i) further extending the period within which the Post-Effective Date Debtors and their estates may remove actions pursuant to 28 U.S.C. § 1452 and (ii) extending the deadline to object to claims filed against the Debtors through and including January 13, 2025; and upon consideration of all papers related thereto; and this Court having found it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334(b), and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012, venue of the chapter 11 cases and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409, that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b), that notice of the Motion is adequate and no other or further notice need be given; and this Court having determined that it may enter a final order consistent with Article III

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 otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

of the Constitution; and upon the record of the chapter 11 cases; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein and such relief is in the best interests of the Post-Effective Date Debtors, their estates and creditors; and after due deliberation and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT:**

1. The Motion is granted as set forth herein.
2. The time provided by Bankruptcy Rule 9027 within which the Post-Effective Date Debtors and their estates may file notices of removal of claims and causes of action hereby is enlarged and extended through and including January 13, 2025 (the "Removal Deadline").
3. The deadline to object to all claims filed against the Debtors' estates is hereby extended through and including January 13, 2025 (the "Claim Objection Deadline").
4. This Order shall be without prejudice to the rights of the Post-Effective Date Debtors and their estates to seek further extensions of the Removal Deadline and Claim Objection Deadline.
5. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.