IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

2019 SEP -6 AM 10:51

IN RE: **WELDED CONSTRUCTION, L.P., et al., Debtors**	**Chapter 11**
	Case No. 18-12378 (KG)
	(Jointly Administered)
	Document No.
	Related to Document No. 963
	Hearing Date: **September 23, 2019 @ 10:00 a.m. (ET)**
	Response Deadline: **September 6, 2019 @ 4:00 p.m. (ET)**

HIGHWAY EQUIPMENT COMPANY'S RESPONSE TO EIGHTH (8TH) OMNIBUS (SUBSTANTIVE) OBJECTION OF THE DEBTOR TO HIGHWAY EQUIPMENT COMPANY'S ADMINISTRATIVE CLAIM PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE, BANKRUPTCY RULE 3007 AND LOCAL RULE 3007-1

AND NOW, comes Respondent, Highway Equipment Company, (hereinafter referred to as "HEC") a creditor of Movants, Welded Construction, L.P. et al. (hereinafter collectively referred to as "Debtor"), and files, pursuant to the provisions of Fed. R. Bankr. P. 3007 and Del. Bankr. LR 3007(h) and Del Bankr. LR 9013(g) and (h) the within Response to Debtors' Eighth (8th) Omnibus (Substantive) Objection to the Administrative Claim of HEC, which respectfully represents as follows:

FIRST DEFENSE

1. The averments of ¶'s 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12 and 13 of the Debtors' Eighth Omnibus (Substantive) Objection are admitted insofar as consistent with the record filed in this matter. To the extent the above referenced allegations are at variance therewith the allegations

are denied for the reasons set forth in the record.

2. The averments of ¶'s 6 and 14 of the Objection are denied. After reasonable investigation, HEC is without knowledge or information sufficient to formulate a belief as to the truth thereof. Strict proof thereof is demanded at time of trial.

3. The averments of ¶'s 15 and 16 of the Objection are statements of opinion and contain a request for relief and/or conclusions of law to which no responses is required and are, therefore, deemed denied.

4. The averments of ¶'s 17 through 23, inclusive of the Objection are directed to parties other than HEC and to which no response is, therefore, required and the same are, therefore, deemed denied.

5. The averments of ¶24 and 25 of the Motion are denied for the following reasons:

a. A true and correct photocopy of HEC's Administrative Claim with abstract of claim and invoices attached and filed as Claim #772 is attached hereto, made part hereof, expressly incorporated herein by reference and designated Exhibit "A" hereof.

6. HEC avers that the Exhibit "D" to the motion and the Pometti Affidavit are in error as they related to HEC. HEC has not been paid on Invoices #R03290 and Z032935. Exhibit "A" makes specific reference that Invoices #R03290 and Z032935 have been included in the claim unless payment has been forthcoming from Columbia Gas/TransCanada. Upon information and belief, Columbia Gas/TransCanada has indicated an inclination, but no commitment to deny the HEC claim. The claim remains unpaid, and essentially denied, despite Welded's confirmation that the subject invoices are attributable to the Columbia Gas/TransCanada MXP and LXP projects. A true and correct photocopy of a reconciliation

supplied by Welded to HEC is attached hereto, made part hereof, expressly incorporated herein by reference and designated Exhibit "B" hereof.

Furthermore, the debtor submitted a motion to the Court at docket #43, which is made part hereof and expressly incorporated herein by reference as though set forth with particularity herein whereby, in short, the debtor sought to have authorization from the court to have Columbia Gas/TransCanada make a direct payment to various creditors, including critical vendors. Upon information and belief an order authorizing the requested relief, but not directing the debtors to enter into such an agreement, was entered by the Court (see Dkt #43). However, the designation of those specific creditors encompassed by the Order is subject to a sealed instrument filed with the Court. HEC has not received any payment for pre-petition or post-petition claims from Columbia Gas/TransCanada. Consequently, HEC believes and, therefore, avers that HEC was not designated as such a creditor on the sealed list of those to be paid. HEC believes and, therefore, avers, alternatively that the administrative claim of HEC with respect to invoices numbered R03290 and Z032935 should be an allowed administrative claim or, alternatively, that HEC be authorized to proceed directly against Columbia Gas/TransCanada for recovery of the amounts due. Under relevant decisional authority, HEC is entitled to an equitable lien on any funds owed by Columbia Gas/TransCanada to the debtor, and that any such lien takes priority to any claim of the debtor-in-possession. It has been settled law in the Commonwealth of Pennsylvania (as well as other states) for over forty years that a materialman's claim must be fully satisfied before the contractor or its creditors are entitled to any funds. Jacobs v. Northeastern Corp., 416 Pa. 417, 206 A.2d 49;(1965); Ram Construction Co., Inc. v. American States Ins. Co., 749 F.2d 1049, 1054-55 (3rd Cir. 1984). Funds remaining in the hands of the owner are not property of the bankrupt estate until the claims of materialmen have been fully

satisfied. See Ram Construction Co., Inc. v. American States Ins. Co., 749 F.2d 1049, 1054 (3rd Cir. 1984); Pearlman v. Reliance Ins. Co., 371 U.S. 132 (1962); In re: Modular Structures, 27 F.3d 72, 78-80 (3rd Cir. 1994); Prairie State National Bank v. United States, 164 U.S. 227 (1896). See also Atlantic Refining Co. v. Continental Casualty Co., 183 F.Supp. 478, 482-83(W.D. Pa. 1960). Unpaid materialman's rights are superior in priority to perfected bank liens. See National Shawmut Bank v. New Amsterdam Casualty Company, 411 F.2d 843 (1st Cir. 1969); In re: Modular Structures, 27 F.3d 72, 77-78 (3rd Cir. 1994,

Upon information and belief, Columbia Gas/TransCanada holds funds in the amount of between $7,000,000.00 to $53,000,000.00 for work done or to be completed on the MXP and LXP projects (see Dkt #43 above).

7. HEC avers that the Exhibit "D" to the motion and the Pometti Affidavit are in error as they related to HEC with respect to invoices #R19758 and Z03742. On December 21, 2018, Sunoco Partners Marketing & Terminals, LP and Sunoco Pipeline, LP (hereinafter referred to collectively as "Sunoco") filed a motion to approve a compromise settlement with the debtor-in-possession regarding a similar application as that related to Columbia Gas/TransCanada at Docket #360. The aforesaid motion is filed of record and made part hereof as though set forth with particularity herein. The foregoing motion is sealed and, therefore, unavailable to HEC. However, on January 3, 2019, an order was entered by the Court at Docket #392 which approved the motion for settlement filed at docket #360. The foregoing order is filed of record and made part hereof and incorporated herein by reference as though set forth with particularity herein. Pursuant to a Subcontractor Direct Payment Agreement authorized by the settlement, payment was made by Sunoco to HEC, in part, with the exception of invoices numbered #R19758 and Z03742. A review of the settlement instrument executed by Sunoco with HEC indicates that

after the filing of the debtor's petition for relief with the bankruptcy court that Sunoco retained Precision Pipeline, LLC (hereinafter referred to as "Precision" to take over Welded's work on the Sunoco ETP project. The Subcontractor Direct Pay Agreement also provided that work performed by HEC after Welded's termination shall be included in the amount payable to HEC under the Precision Subcontract and shall be paid by Precision to HEC with the terms of the Precision Subcontract [with Sunoco]. HEC has made demand upon Precision for payment. Precision has denied payment asserting that it had no agreement with Sunoco with respect to making such a payment. Consequently, HEC has asserted its administrative claim with respect to invoices #R19758 and Z03742 in the bankruptcy as an unpaid administrative claimant. HEC believes and, therefore, avers, alternatively, that the administrative claim of HEC with respect to invoices numbered #R19758 and Z03742, should be an allowed administrative claim, or, alternatively, that HEC be authorized to directly proceed against Sunoco and/or Precision for recovery of the amounts due. Under relevant decisional authority, HEC is entitled to an equitable lien on any funds owed by Sunoco and/or Precision for the amount claimed and that any such lien takes priority to any claim of the debtor-in-possession. Upon information and belief, Sunoco may still owe funds to the debtor–in-possession for work performed on relevant projects. Based upon the record at docket #360 and 392, HEC has not attached a copy of the Subcontractor Direct Pay Agreement and Authorization upon which Sunoco represented that Precision was responsible for payment of invoices #R19758 and Z03742, but such information is available should the court direct its disclosure.

8. As respects invoice #D05205, HEC admits that the foregoing invoice was paid pursuant to a bond claim. The HEC administrative claim should be modified to accommodate such payment.

9. As respects invoice #M07227, based upon the reconciliation submitted by Welded (Exhibit "B"), HEC believes that the service provided thereunder is attributable to the ASR project and remains unpaid at this time.

10. The averments of ¶'s 26-29 constitute conclusions of law to which no response is required and are, therefore, deemed denied. Additionally to the extent said averments refer to matters of record they are admitted to the extent said averments are consistent with the record filed in this matter. To the extent they are inconsistent with the record, they are denied for the reasons set forth in the record of this proceeding.

11. The name address and telephone number and email address of person possessing ultimate authority to reconciles, settle or otherwise resolve the administrative claim on behalf of Highway Equipment Company:

Kari Broze, CPA, Controller
Highway Equipment Company
22035 Perry Highway
Zelienople, PA 16063
Phone: 724-452-7800x1056
Email: kbroze@highway-equipment.com

CLAIMANT REQUESTS THAT ALL CORRESPONDENCE WITH RESPECT TO THIS MATTER BE DIRECTED TO THE UNDERSIGNED.

WHEREFOR, Claimant/Creditor, Highway Equipment Company requests that the relief required by the Debtors and the Proposed Order of Court submitted by Debtors be modified, insofar as it relates to only Highway Equipment Company to state in ¶5 of the proposed Order that Highway Equipment Company's administrative claim is allowed with respect to Invoice

number R03290, Z032935, R19758, Z03742, and invoice M07227 and that payment thereof is authorized to be made by the debtor-in-possession.

Attorney for Highway Equipment Company, Creditor

/s/David Abrams, Esquire
DAVID ABRAMS, ESQUIRE
ABRAMS LAW FIRM
12A N. Meadowcroft Avenue
Pittsburgh, PA 15216
Telephone: 412-207-9520
Fax: 412-207-9531
Pa. Supreme Ct. No. 15983

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
WELDED CONSTRUCTION, L.P., *et al.*,[1]	)	Case No. 18-12378 (KG)
Debtors.	)	(Jointly Administered)

COPY

AMENDED AND SUPPLEMENTAL
REQUEST FOR PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM FOR THE PERIOD FROM THE PETITION DATE THROUGH AND INCLUDING MARCH 31, 2019

1. Name of claimant: Highway Equipment Company
2. Debtor that the claim is asserted against (check one):
   - X Welded Construction, L.P.
   - ___ Welded Construction Michigan, LLC
3. Nature and description of the claim (you may attach a separate summary): Rental equipment and services supplied per abstract and invoices attached hereto
4. Date(s) claim arose: See abstract and invoices attached
5. Amount of claim: $45,479.77
6. Documentation supporting the claim must be attached hereto. Documentation should include both evidence of the nature of the Administrative Expense Claim asserted as well as evidence of the date or dates on which the Administrative Expense Claim arose.

Date: 4/22/2019 Signature: Kari K Bird

Name: Highway Equipment Company

RECEIVED
APR 24 2019
KURTZMAN CARSON CONSULTANTS

c/o David Abrams, Esquire, Abrams Law
12A N. Meadowcroft Avenue
Address: Pittsburgh, PA 15216
Phone Number: 412-207-9520
Email: dabrams@amlaw.biz

[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 26933 Eckel Road, Perrysburg, OH 43551.

Claim # 772
Initials CCC

NameID: 13644045

EXHIBIT A 1

AMENDED AND SUPPLMENTAL ABSTRACT OF ADMINISTRATIVE CLAIM - INVOICE LIST AND BALANCE DUE

DATE	JOB SITE	INVOICE #	CONTRACT #	BRANCH	AMOUNT DUE
12/26/18	Glendale, WV – Columbia Gas/TransCanada	R03290	001087	Canton – MXP	10,920.00
01/30/19	Glendale, WB – Columbia Gas/TransCanada	Z032935	001087	Canton – LXP	6,908.52
11/05/18 – See Below	Morgantown, PA – Energy Transfer Project – Sonoco – Welded/Precision Pipeline	R19758	005903	Zelienople	2,459.20
02/28/19 – See Below	Morgantown, PA – Energy Transfer Project – Sunoco – Welded/Precision Pipeline	Z03742	005903	Zelienople	10,803.36
01/26/18 – See Below	Transcontinental Gas Pipeline Company, LLC	D05205-repairs			9,276.40
04/10/19	Undetermined at this time	M07227			5,112.29
TOTAL:					45,479.77

CONTINGENT FILINGS:

Invoices #R03290 and Z032935 have been claimed against and submitted to Columbia Gas/TransCanada but remain unpaid at this time and have been added to this administrative claim, in the event, payment is not forthcoming from Columbia Gas/TransCanads..

Invoices# R19758 and Z03742 have been claimed against and submitted to Precisions Pipeline, LLC and have been added to this administrative claim, in the event, payment is not forthcoming per direct pay agreement re: Welded

Invoice # D05205 has been claimed against and submitted Transcontinental Gas Pipeline Company LLC and has been added to this administrative claim, in the event payment is not forthcoming per claim with Transcontinental.

Invoice #M07227 – repair invoice – attempting to determine project on which Kaeser 400 CFM Air was used and to which invoice is to be allocated.

HIGHWAY EQUIPMENT COMPANY

800-222-8798 • FAX: 724.452.4309 • www.highway-equipment.com

Since 1933

Ship to:
Welded Construction LP
1591 wheeling Avenue
Glendale WV 26038
FOB Zelie 7-10-18
Job Site: Glendale WV 26038

Invoice to:
Welded Construction LP
26933 Eckel Rd
P. O. Box 470
Perrysburg OH 43551

Attention: Brett Bushman

Branch		
07 - Canton *REPRINT*		
Date	Time	Page
12/26/2018	8:56:18 (E)	1
Account No.	Phone No.	Invoice No.
HWELD001	419-874-3548	R03290
Ship Via	Purchase Order	
HECO TO ARRANGE	N/A	
Equipment Insurance Value	Salesperson	
	41 / 41	

RENTAL INVOICE

Description	INVOICE #: R03290 For Contract #: 001087		Amount
Billing #: 7	Covering From 12/25/2018 to 01/21/2019		
IH IC120-2			
KATO Crawler Carrier	Charge for usage of	1 MONTH	10900.00
Stock #: E18168	Serial #: CB004066		
Date Out: 07/10/2018 08:00	Expected return date: 08/07/2018 08:00		
Machine hours out: 134			
Rates: 1740.00/DAILY	4360.00/WEEK	10900.00/MONTH	
RENTALS ARE BASED ON	160 HOURS USAGE PER MONTH		
ENVIRO FEES	Charge for usage of	1 MONTH	20.00
Part #: OTHERENV		1 PIECE	
Date Out: 07/10/2018 08:00	Expected return date: 08/07/2018 08:00		
Rates: 2.00/DAILY	8.00/WEEK	20.00/MONTH	
		Subtotal:	10920.00
		Total Charge:	10920.00

MACHINE SENT WITH FULL FUEL. PLEASE RETURN IT FULL OR THE DIFFERENCE WILL BE INVOICED.

****

REMIT: HIGHWAY EQUIPMENT CO. OF OHIO, BOX 645310, PITTSBURGH, PA 15264-5310

****

Highway Equipment Company
22035 Perry Highway
Zelienople, PA 16063
Office: 724-452-7600

Highway Equipment Company
4660 Route 219 North
DuBois, PA 15801
Office: 814-371-3800

Highway Equipment Company
5848 West Road
McKean, PA 16426
Office: 814-476-7765

Machinery Rental, (MRC)
A Division of Highway Equipment
22035 Perry Highway
Zelienople, PA 16063
Office: 412-361-3600

Highway Equipment Company Mid-Atlantic
8071 Lee Highway
Troutville, VA 24175
Office: 540-992-4180

305 Executive Park Drive
Concord, NC 28025
Office: 980-781-4510

Highway Equipment Company of Ohio
1405 Timken Place, SW
Canton, OH 44706
Office: 330-915-8301

HIGHWAY EQUIPMENT COMPANY

800-222-8798 • FAX: 724.452.4309 • www.highway-equipment.com

Since 1933

Ship to: SAME AS BELOW

Invoice to: Welded Construction LP
26933 Eckel Rd
P. O. Box 470
Perrysburg OH 43551

Branch: ZELIENOPLE		
Date: 01/30/19	Time: 15:19:00 (0)	Page: 01
Account No.: HWELD001	Phone No.: 419-874-3548	Invoice No.: E03935
Ship Via:	Purchase Order: N/A	
		Salesperson: APE

SERVICE INVOICE

STK#/FLEET#		HRS	PIN/EIN	WARRANTY DATE	HRS
E18168	KATO Crawler Carri IC120-2	491	CB004066	04/26/19	1000

SEGMENT# 1 5 615 N/A 01/03/19 01/04/19
Rental Damage
CORRECTION:
1/28 /19 drilled out broken off bolts in front pull bar and re taped holes and got new bolts from parts and matched them up and installed new bolts lock washers and flat washers with new pull bar installed belly pans were left off unit when serviced. straitened right front step removed step to straiten step and reinstalled step was bent from rental damage ground and fitted brackets on to gate had sean cassandro weld brackets and lock on gate cleaned cab was covered in mud
vac ed out and washed in side
PREPPED AND PAINTED. HECO REP: BRENT SWANSON 154
1/30 /19 installed gate wire wheeled pins and grease pins had to grind latch to be able to lock gate and repainted were ground down latch and adjusted locks to make shore gate closed when bed was in down pension test operation and hocked up battery was un hocked when gate was welded on
615
ADDITIONAL DESCRIPTION:
checked out rental damage and got prices

D20672600	TAILGATE	1 N	3995.39	3995.39
D47069200	GUARD	1 N	276.30	276.30
FP101	FILLER PRIMER	2	6.99	13.98
			PARTS	4285.67
			LABOR	2173.60
10110000			SEGMENT TOTAL==>	6459.27

CONTINUED ON PAGE 02

Highway Equipment Company
22035 Perry Highway
Zelienople, PA 16063
Office: 724-452-7800

Highway Equipment Company
4690 Route 219 North
DuBois, PA 15801
Office: 814-371-3600

Highway Equipment Company
9848 West Road
McKean, PA 16426
Office: 814-476-7765

Machinery Rental, (MRO)
A Division of Highway Equipment
22035 Perry Highway
Zelienople, PA 16063
Office: 412-381-3900

Highway Equipment Company Mid-Atlantic
6071 Lee Highway
Troutville, VA 24175
Office: 540-992-4150

305 Executive Park Drive
Concord, NC 28025
Office: 980-781-4510

Highway Equipment Company of Ohio
1405 Timken Place, SW
Canton, OH 44706
Office: 330-915-9301

HIGHWAY EQUIPMENT COMPANY

800-222-6798 • FAX: 724.452.4309 • www.highway-equipment.com

Since 1933

Ship to: SAME AS BELOW

Invoice to:
Welded Construction LP
26933 Eckel Rd
P. O. Box 470
Perrysburg OH 43551

Branch: ZELIENOPLE		
Date: 01/30/19	Time: 15:19:00 (O)	Page: 02
Account No.: HWELD001	Phone No.: 419-874-3548	Invoice No.: 203935
Ship Via:	Purchase Order: N/A	
	Salesperson: APB	

SERVICE INVOICE

STK#/FLEET#		HRS	PIN/EIN	WARRANTY DATE	HRS
E18168	KATO Crawler Carri IC120-2	491	CB004066	04/26/19	1000

****** WORK ORDER TOTALS ******	
PARTS	4285.67
LABOR	2173.60
Enviro Fee	150.00
Shop Supplies	150.00
SUB TOTAL==>	6759.27
PA SALES TAX @ 6.0%	149.25
Total Charge	6908.52

Highway Equipment Company
22035 Perry Highway
Zelienople, PA 16063
Office: 724-452-7800

Highway Equipment Company
6960 Route 219 North
DuBois, PA 15801
Office: 814-371-3800

Highway Equipment Company
6848 West Road
McKean, PA 16426
Office: 814-476-7785

Machinery Rental, (MRC)
A Division of Highway Equipment
22035 Perry Highway
Zelienople, PA 16063
Office: 412-361-3800

Highway Equipment Company Mid-Atlantic
8071 Lee Highway
Troutville, VA 24175
Office: 540-992-4150

306 Executive Park Drive
Concord, NC 28025
Office: 980-781-4510

Highway Equipment Company of Ohio
1408 Timken Place, SW
Canton, OH 44706
Office: 330-918-8381

EXHIBIT A 5

HIGHWAY EQUIPMENT COMPANY

800-222-8798 • FAX: 724.452.4309 • www.highway-equipment.com

Since 1933

Ship to:
Welded Construction LP
6021 Morgantown Road
Morgantown, PA 19543
POD ZELIE 12-1-17
Job Site: Morgantown, PA 19543

Invoice to:
Welded Construction LP
2 .33 Eckel Rd
P. O. Box 470
Perrysburg OH 43551

Attention: Brett Bushman

Branch		
01 - ZELIENOPLE *REPRINT*		
Date	Time	Page
11/02/2018	11:07:00 (O)	1
Account No.	Phone No.	Invoice No.
HWELD001	419-874-3548	R19758
Ship Via	Purchase Order	
Customer to Arr	75929	
Equipment Insurance Value	Salesperson	
	25 / 25	

RENTAL INVOICE

Description			Amount
INVOICE #: R19750 For Contract #: 005903			
Billing #: 13 Covering From 11/02/2018 to 11/29/2018			
FN 870S T4			
FINN STRAWBLOWER	Charge for usage of	1 MONTH	2300.00
Stock #: [illegible] 7162 Serial #: MN-4505			
Date Out: 11/01/2017 08:00 Expected return date: 12/28/2017 08:00			
Machine hours out: 21			
Rates: 360.00/DAILY 920.00/WEEK 2300.00/MONTH			
RENTALS ARE BASED ON 160 HOURS USAGE PER MONTH			
ENVIRO FEES	Charge for usage of	1 MONTH	20.00
Part #: OTHERENV		1 PIECE	
Date Out 11/01/2017 08:00 Expected return date: 12/28/2017 08:00			
Rates: .00/DAILY 0.00/WEEK 20.00/MONTH			
	Subtotal:		2320.00
	1-PA SALES TAX @ 6.0%:		139.20
	Total Charge:		2459.20

MACHINE SENT WITH FULL FUEL. PLEASE RETURN IT FULL OR THE DIFFERENCE WILL BE INVOICED

Monthly Rental

*REMIT TO:
*HIGHWAY EQUIPMENT COMPANY
*BOX 640305
*PITTSBURGH, PA 15264-0305

Highway Equipment Company
[illegible]
Office: [illegible]

Highway Equipment Company
[illegible]
Office: 814-371-3800

Highway Equipment Company
6640 West Road
McKean, PA 16426
Office: 814-476-7756

Machinery Rental, (MRC)
A Division of Highway Equipment
[illegible] 35 Perry Highway
Zelienople, PA 16063
Office: 412-361-3800

Highway Equipment Company Mid-Atlantic
9071 Lee Highway
Troutville, VA 24175
Office: 540-992-4180

309 Executive Park Drive
Concord, NC 28025
Office: 980-781-4810

Highway Equipment Company of Ohio
1405 Timken Place, SW
Canton, OH 44706
Office: 330-918-8301

EXHIBIT A 6

HIGHWAY EQUIPMENT COMPANY

800-222-8798 • FAX: 724.452.4309 • www.highway-equipment.com

Since 1933

Ship to: SAME AS BELOW

RENTAL WAS IN MORGANTOWN, PA

Invoice to:
Welded Construction LP
26933 Eckel Rd
P. O. Box 470
Perrysburg OH 43551

Branch: ZELIENOPLE	*REPRINT*	
Date: 02/28/19	Time: 22:00:44 (E)	Page: 01
Account No.: HWELD001	Phone No.: 419-874-3548	Invoice No.: E03742
Ship Via:	Purchase Order: N/A	
		Salesperson: APE

SERVICE INVOICE

STK#/FLEET#		HRS	PIN/EIN	WARRANTY DATE	HRS
LE17162	Finn Strawblower, B70S T4	233	MN-4505	11/30/19	2000

SEGMENT# 1 C 154 NA 11/29/18 12/05/18 11/29/18
Rental Damage/ rebuild 38.41 HRS
CORRECTION:
Brought Unit into shop and ordered all the parts to fix unit. Unit was trashed, replaced entire unit from engine back. Machine also needs full service. Received all the parts
in and disassembled unit. The propeller housing was welded on, had to cut off all welds. Touched up rough spots. Welded housing back onto unit. Put new coupler on unit and aligned. Put new propeller and beater chains on unit. Sanded entire machine including all new parts and painted. Ordered new decals and applied. Assembled unit with new hardware and all piping for blower shoot got new seals. Also had to replace monitor and ignition switch due to them being broken. Serviced entire machine. Engine oil/filters. Engine air filters, and fuel filters were all changed. Checked coolant and cleaned rad due to it being packed with debris and unit having overheating code. Ran machine and it works properly. Unit has no active codes. Load tested the battery and it load tested great.
HECO REP: BRENT SWANSON #154

FP101	FILLER PRIMER	2	6.99	13.98
FRT	FREIGHT	2	113.17	226.34
M10W	WASHER	28	.15	4.20
M8X1.25LN	NUT	4	.15	.60
M8X1.25X25	CAPSCREW	4	.34	1.36
NAP25551	AIR FILTER	1	29.45	29.45
NFF5638	FUEL FILTER	1	28.30	28.30

CONTINUED ON PAGE 02

Highway Equipment Company
22035 Perry Highway
Zelienople, PA 16063
Office: 724-452-7600

Highway Equipment Company
4690 Route 219 North
DuBois, PA 15801
Office: 814-371-3600

Highway Equipment Company
8848 West Road
McKean, PA 16426
Office: 814-476-7766

Machinery Rental, (MRC)
A Division of Highway Equipment
22035 Perry Highway
Zelienople, PA 16063
Office: 412-361-3600

Highway Equipment Company Mid-Atlantic
8071 Lee Highway
Troutville, VA 24175
Office: 540-992-4160

305 Executive Park Drive
Concord, NC 28025
Office: 980-781-4610

Highway Equipment Company of Ohio
1408 Timken Place, SW
Canton, OH 44706
Office: 330-916-8381

HIGHWAY EQUIPMENT COMPANY

Since 1933

800-222-8798 • FAX: 724.452.4309 • www.highway-equipment.com

Ship to: SAME AS BELOW

Invoice to:
Welded Construction LP
26933 Eckel Rd
P. O. Box 470
Perrysburg OH 43551

Branch: ZELIENOPLE		
Date: 02/28/19	Time: 22:00:44 (E)	Page: 02
Account No.: HWELD001	Phone No.: 419-874-3548	Invoice No.: Z03742
Ship Via:	Purchase Order: N/A	
	Salesperson: APE	

SERVICE INVOICE

STK#/FLEET#		HRS	PIN/BIN	WARRANTY DATE	HRS	
LE17162	Finn Strawblower, B70S T4	233	MN-4505	11/30/19	2000	
NLF3462	OIL FILTER	1		10.99		10.99
S1/4LW	LOCKWASHER	2		.06		.12
S1/4W	WASHER	4		.08		.32
S1/4X1NC	CAPSCREW	2		.15		.30
S3/8LW	LOCKWASHER	23		.17		3.91
S3/8NC	NUT	23		.16		3.68
S3/8W	WASHER	18		.22		3.96
S3/8X1-1/2NC	CAPSCREW	3		.45		1.35
S3/8X1NC	CAPSCREW	21		.24		5.04
S5/16W	WASHER	8		.13		1.04
VV129A00557J0J1L	FUEL FILTER	1		17.75		17.75
W2B	15W40 OIL	8		3.96		31.68
	ONE QUART/WOLF'S HEAD ENGINE OIL(BULK)					
012681A	BEIGE PAINT	5		15.32		76.60
01396	2"/RESIN DISC	5		1.73		8.65
030950	BEATER HUB KIT	1	N	341.54		341.54
030980	BLOWER HOUSING	1	N	535.34		535.34
031018-01	BEARING BLOCK	3		6.60		19.80
031029	BLOWER BLADE	1		1275.00		1275.00
031086	SEAL	1	N	24.20		24.20
031109	BANDING	1	N	20.31		20.31
031184-01	CHUTE STAND	1	N	130.00		130.00
031235	DECAL-'FINN'	2	N	16.10		32.20
031238-05	BRACKET	1	N	13.15		13.15
031239	ELBOW ASSEMBLY	1	N	571.90		571.90
031240	DISCHARGE TUBE	1	N	335.15		335.15
031242-03	ELBOW SIDE SEAL	2	N	15.00		30.00
031242-04	ELBOW SIDE SEAL	1	N	15.32		15.32
031242-07	ELBOW SIDE SEAL	2	N	15.00		30.00
031274SP	COUPLING INSERT	1		53.00		53.00

CONTINUED ON PAGE 03

Highway Equipment Company
22035 Perry Highway
Zelienople, PA 16063
Office: 724-452-7800

Highway Equipment Company
4890 Route 219 North
DuBois, PA 15801
Office: 814-371-3800

Highway Equipment Company
6640 West Road
McKean, PA 16426
Office: 814-476-7798

Machinery Rental, (MRC)
A Division of Highway Equipment
22035 Perry Highway
Zelienople, PA 16063
Office: 412-381-3600

Highway Equipment Company Mid-Atlantic
8071 Lee Highway
Troutville, VA 24175
Office: 540-992-4150

305 Executive Park Drive
Concord, NC 28025
Office: 980-781-4810

Highway Equipment Company of Ohio
1405 Timken Place, SW
Canton, OH 44706
Office: 330-916-8391

HIGHWAY EQUIPMENT COMPANY

800-222-8798 • FAX: 724.452.4309 • www.highway-equipment.com

Since 1933

Ship to: SAME AS BELOW

Invoice to: Welded Construction LP
26933 Eckel Rd
P. O. Box 470
Perrysburg OH 43551

Branch		
ZELIENOPLE		
Date	Time	Page
02/28/19	22:00:44 (E)	03
Account No.	Phone No.	Invoice No.
HWELD001	419-874-3548	Z03742
Ship Via	Purchase Order	
	N/A	
	Salesperson	
	APE	

SERVICE INVOICE

STK#/FLEET#		HRS	PIN/EIN	WARRANTY DATE	HRS	
LE17162	Finn Strawblower, B708 T4	233	MN-4505	11/30/19	2000	
031292		SHREDDER BOX	1 N	773.68		773.68
031338-09		TOP SEAL	1 N	17.87		17.87
031338-10		TOP PLATE	1 N	14.00		14.00
031338-11		HINGE SEAL	1 N	15.54		15.54
031338-12		SEAL	2 N	35.00		70.00
031389		TOOL BOX	1 N	25.97		25.97
031460		B70 DECAL SHEET	1 N	72.28		72.28
031506		IGNITION SWITCH	1 N	35.63		35.63
031520		DISPLAY	1 N	729.20		729.20
07480		2"ROLOC DISC	5	1.41		7.05
80400350	LARGE	NITRALE GLOVES	1	9.00		9.00
				PARTS		5666.75
				LABOR		4225.10
10110000	40061601			SEGMENT TOTAL==>		9891.85

****** WORK ORDER TOTALS ******	
PARTS	5666.75
LABOR	4225.10
Enviro Fee	150.00
Shop Supplies	150.00
SUB TOTAL==>	10191.85
PA SALES TAX @ 6.0%	611.51
Total Charge	10803.36

****

REMIT: HIGHWAY EQUIPMENT COMPANY, PO BOX 640305, PITTSBURGH, PA 15264-0305

****

CONTINUED ON PAGE 04

Highway Equipment Company
23036 Perry Highway
Zelienople, PA 16063
Office: 724-452-7800

Highway Equipment Company
5648 West Road
McKean, PA 16426
Office: 814-476-7795

Highway Equipment Company Mid-Atlantic
6071 Lee Highway
Troutville, VA 24175
Office: 540-992-4150

Highway Equipment Company of Ohio
1405 Timken Place, SW
Canton, OH 44706
Office: 330-916-8381

Highway Equipment Company
4960 Route 219 North
DuBois, PA 15801
Office: 814-371-3600

Machinery Rental, (MRC)
A Division of Highway Equipment
23036 Perry Highway
Zelienople, PA 16063
Office: 412-361-3800

309 Executive Park Drive
Concord, NC 28025
Office: 980-781-4810

HIGHWAY EQUIPMENT COMPANY

800-222-8798 • FAX: 724.452.4309 • www.highway-equipment.com

Since 1933

Ship to: SAME AS BELOW

Invoice to: Welded Construction LP
26933 Eckel Rd
P. O. Box 470
Perrysburg OH 43551

Branch: DUBOIS	*REPRINT*	
Date: 12/26/18	Time: 22:01:10 (B)	Page: 01
Account No.: HWELD001	Phone No.: 419-874-3548	Invoice No.: D05205
Ship Via:	Purchase Order:	
		Salesperson: LHA

SERVICE INVOICE

STK#/FLEET#		HRS	PIN/EIN	WARRANTY DATE	HRS
E17069	Kobelco Excavator,	X	YC13-13199	05/24/20	3000
SBG	SK350LC-9E	1346	J08EVV10307		

SEGMENT# 1 C 272 NA 11/13/18 11/13/18
Rental Damage Repairs 39.08 HRS ,

COMPLAINT:
Machine had rental damage.

CAUSE:
Rental Damage

CORRECTION:
Machine had rental damage. Left rear door smashed, left swing light broke, counter weight had bad paint damage. Machine was also missing two steps, had a bent step, had two broken mirrors, both antennas were broke and hand rail on right side was loose. Parts were ordered. New door was installed and decals installed on door. Step was straightened and new steps were painted and installed. Both antennas were replaced. Both mirrors were replaced. Hand rail was straightened and tightened. Swing lights and camera were removed. Counter weight was sanded down to bare metal and frame rails were sanded. Dents and scratched were then filled and sanded until smooth. Once counter weight and frame rails were filled and smooth machine was masked off. Machine was then painted with primer. Once primer was dry counter weight was painted. Then frame rails were painted. Both got two coats of paint. Machine had masking removed. Swing lights and camera were then reinstalled. New decals were installed on machine and Highway decals were installed.
HECO Rep Jarod Flood 11-28-18

ADDITIONAL DESCRIPTION:
Rental Damage

CONTINUED ON PAGE 02

Highway Equipment Company
23035 Perry Highway
Zelienople, PA 16063
Office: 724-452-7800

Highway Equipment Company
4680 Route 219 North
DuBois, PA 15801
Office: 814-371-3600

Highway Equipment Company
5848 West Road
McKean, PA 16426
Office: 814-476-7756

Machinery Rental (MRC)
A Division of Highway Equipment
23035 Perry Highway
Zelienople, PA 16063
Office: 412-361-3600

Highway Equipment Company Mid-Atlantic
8071 Lee Highway
Trevilio, VA 24176
Office: 540-992-4180

305 Executive Park Drive
Concord, NC 28025
Office: 980-781-4610

Highway Equipment Company of Ohio
1405 Timken Place, SW
Canton, OH 44706
Office: 330-918-8391

HIGHWAY EQUIPMENT COMPANY

800-222-8798 • FAX: 724.452.4309 • www.highway-equipment.com

Since 1933

Ship to: SAME AS BELOW

Invoice to:
Welded Construction LP
26933 Eckel Rd
P. O. Box 470
Perrysburg OH 43551

Branch		
DUBOIS		
Date	Time	Page
12/26/18	22:01:10 (B)	02
Account No.	Phone No.	Invoice No.
HWELD001	419-874-3548	D05205
Ship Via	Purchase Order	
		Salesperson
		LHA

SERVICE INVOICE

STK#/FLEET#		HRS	PIN/EIN	WARRANTY DATE	HRS	
E17069	Kobelco Excavator,	X	YC13-13199	05/24/20	3000	
SBG	SK350LC-9E	1346	J08EVV10307			
FRT		FREIGHT		2 37.56		75.11
LC21C02809P1		PANEL		1 N 437.41		437.41
LC22T00109P1		NAME PLATE		1 N 60.87		60.87
LC24C01175P1		COVER		1 N 388.61		388.61
LC24C01176P1		COVER		1 N 553.62		553.62
LQ52C00007F1		MIRROR KIT		1 N 125.67		125.67
LQ54S000035004		ANTENNA		1 S 116.74		116.74
RASM35-15		INSTANT START		1 3.05		3.05
YM80S00001F1		FLASHING LAMP		1 212.41		212.41
YN20T01003P2		LABEL		2 S 7.70		15.40
YN20T02351D2		LABEL		2 S 22.48		44.96
YN21C05964P1		PANEL		1 N 1521.49		1521.49
YN22T00244P1		DECAL(BLACK)		1 S 69.03		69.03
YN41C00007P1		STEP		2 S 121.05		242.10
YN54S00052P1		ANTENNA		1 N 148.34		148.34
2456E416		MIRROR		1 131.67		131.67
3X28		DECAL		1 6.06		6.06
				PARTS		4152.54
				LABOR		4298.80
10100002				SEGMENT TOTAL==>		8451.34

****** WORK ORDER TOTALS ******	
PARTS	4152.54
LABOR	4298.80
Enviro Fee	150.00
Shop Supplies	150.00
SUB TOTAL==>	8751.34
PA SALES TAX @ 6.0%	525.06

CONTINUED ON PAGE 03

Highway Equipment Company
22035 Perry Highway
Zelienople, PA 16063
Office: 724-453-7600

Highway Equipment Company
4890 Route 219 North
DuBois, PA 15801
Office: 814-371-3600

Highway Equipment Company
6648 West Road
McKean, PA 16426
Office: 814-476-7756

Machinery Rental, (MRC)
A Division of Highway Equipment
22035 Perry Highway
Zelienople, PA 16063
Office: 412-381-3600

Highway Equipment Company Mid-Atlantic
8071 Lee Highway
Troutville, VA 24175
Office: 540-992-4160

305 Executive Park Drive
Concord, NC 28025
Office: 980-781-4910

Highway Equipment Company of Ohio
1405 Timken Plaza, SW
Canton, OH 44706
Office: 330-916-6391

HIGHWAY EQUIPMENT COMPANY

800-222-8798 • FAX: 724.452.4309 • www.highway-equipment.com

Since 1933

Ship to: SAME AS BELOW

Invoice to:
Welded Construction LP
26933 Eckel Rd
P. O. Box 470
Perrysburg OH 43551

Branch		
DUBOIS		
Date	Time	Page
12/26/18	22:01:10 (B)	01
Account No.	Phone No.	Invoice No.
HWELD001	419-874-1548	D05205
Ship Via	Purchase Order	
	Salesperson	
	LHA	

SERVICE INVOICE

STK#/FLEET#		HRS	PIN/EIN	WARRANTY DATE	HRS
E17069	Kobelco Excavator,	X	YC13-13199	05/24/20	3000
SBO	SK350LC-9E	1346	J08EVV10307		

CUSTOMER TOTAL 9276.40

Highway Equipment Company
22038 Perry Highway
Zelienople, PA 16063
Office: 724-452-7800

Highway Equipment Company
4880 Route 219 North
DuBois, PA 15801
Office: 814-371-3900

Highway Equipment Company
9846 West Road
McKean, PA 16426
Office: 814-476-7758

Machinery Rental (MRC)
A Division of Highway Equipment
22038 Perry Highway
Zelienople, PA 16063
Office: 412-361-3900

Highway Equipment Company Mid-Atlantic
6071 Lee Highway
Troutville, VA 24175
Office: 540-992-4150

305 Executive Park Drive
Concord, NC 28025
Office: 980-781-4510

Highway Equipment Company of Ohio
1405 Timken Place, SW
Canton, OH 44706
Office: 330-916-9391

412-361-3600

MRC MACHINERY RENTAL
A division of Highway Equipment Company

www.highway-equipment.com

Ship to: SAME AS BELOW

Invoice to:
Welded Construction LP
26933 Eckel Rd
P. O. Box 470
Perrysburg OH 43551

Branch		
MRC		
Date	Time	Page
04/10/19	11:12:16 (O)	01
Account No.	Phone No.	Invoice No.
HWELD001	419-874-3548	M07227
Ship Via	Purchase Order	
		Salesperson
		EKO

SERVICE INVOICE

STK#/FLEET#		HRS	PIN/EIN	WARRANTY DATE	HRS
MR17023	Kaeser 400 CFM Air	424	1038		
	M122				

SEGMENT# 1 5 619 NA 01/23/19 01/25/19
RENTAL DAMAGE
CORRECTION:
replaced one battery, fixed front left marker bracket, repaired and welded back right light bracket and secured wires removed both doors to be able to replace top center panel reinstalled doors with new hinges . replaced rear lower panel and installed new break away cable.
ADDITIONAL DESCRIPTION:
BROKEN DOOR HINGES, TOP CENTER PANEL, BOTTOM REAR PANEL DAMAGED, LEFT FRONT MARKER LIGHT BROKEN, & RIGHT REAR TAIL LIGHT BROKEN OFF, BATTERY'S DEAD KEY WAS IN ON POSITION WHEN UNIT PICKED UP, UNIT RETURNED EMPTY IT TOOK 50 GALLONS OF FUEL.

FRT	FREIGHT	2		260.00	520.00
FUEL-GAL	DIESEL FUEL	50		7.50	375.00
221248E00010	COVER UP/CENTER	1	N	546.74	546.74
221543E1	AIR INLET GRILL	1	N	1514.24	1514.24
402499.0	HINGE CLOSURE	2	N	511.72	1023.44
694RMF	BATTERY	1	N	208.60	208.60

****** WORK ORDER TOTALS ******	
PARTS	4188.02
LABOR	361.92
Enviro Fee	136.49
Shop Supplies	136.49
SUB TOTAL==>	4822.92

CONTINUED ON PAGE 02

Highway Equipment Company
22035 Perry Highway
Zelienople, PA 16063
O: 724-452-7800

Highway Equipment Company
4690 Route 219 North
DuBois, PA 15801
O: 814-371-3600 F: 814-371-8770

Highway Equipment Company
5846 West Road
McKean, PA 16426
O: 814-476-7755 F: 814-476-1759

Machinery Rental, (MRC)
22035 Perry Highway
Zelienople, PA 16063
O: 412-361-3600 F: 412-361-1624

Highway Equipment Company Mid-Atlantic
8071 Lee Highway
Troutville, VA 24175
O: 540-992-4150 F: 540-992-3742

306 Executive Park Drive
Concord, NC 28025
O: 980-781-4510 F: 980-781-5358

Highway Equipment Company of Ohio
1405 Timken Place, SW
Canton, OH 44706
O: 330-915-8391 F: 330-915-8411

Since 1933

412-361-3600

MRC MACHINERY RENTAL
A division of Highway Equipment Company

www.highway-equipment.com

Ship to: SAME AS BELOW

Invoice to:
Welded Construction LP
26933 Eckel Rd
P. O. Box 470
Perrysburg OH 43551

Branch		
MRC		
Date	Time	Page
04/10/19	11:12:16 (0)	02
Account No.	Phone No.	Invoice No.
HWELD001	419-874-3548	M07227
Ship Via	Purchase Order	
	Salesperson	
	EKO	

SERVICE INVOICE

STK#/FLEET#		HRS	PIN/EIN	WARRANTY DATE	HRS
MR17023	Kaeser 400 CFM Air Compressor M122	424	1038		

PA Sales Tax @ 6.0%	289.37
CUSTOMER TOTAL	5112.29

Highway Equipment Company
22035 Perry Highway
Zelienople, PA 16063
O: 724-452-7800

Highway Equipment Company
4690 Route 219 North
DuBois, PA 15801
O: 814-371-3600 F: 814-371-6770

Highway Equipment Company
5848 West Road
McKean, PA 16426
O: 814-476-7755 F: 814-476-1759

Machinery Rental, (MRC)
22035 Perry Highway
Zelienople, PA 16063
O: 412-361-3600 F: 412-361-1624

Highway Equipment Company Mid-Atlantic
8071 Lee Highway
Troutville, VA 24175
O: 540-992-4150 F: 540-992-3742

305 Executive Park Drive
Concord, NC 28025
O: 980-781-4510 F: 980-781-5356

Highway Equipment Company of Ohio
1405 Timken Place, SW
Canton, OH 44706
O: 330-915-6301 F: 330-915-6411

Since 1933

HIGHWAY EQUIPMENT COMPANY / PROJECT RECONCILIATION

Company	Invoice #	Invoice Date	Invoice Amount	Job #	Location	Notes
Highway Equipment Company	Late Fee	12/21/2017	430.66	2017-09	ASR	
Highway Equipment Company	Late Fee	3/31/2018	198.55	2017-09	ASR	
Highway Equipment Company	Late Fee	6/30/2018	215.82	2018-01	MXP	West Virgina
Highway Equipment Company	R02603	7/20/2018	10,920.00	2016-04	LXP	West Virgina
Highway Equipment Company	R02660	8/7/2018	10,920.00	2016-04	LXP	West Virgina
Highway Equipment Company	R05673	8/15/2018	9,561.20	2017-09	ASR	
Highway Equipment Company	R05674	8/15/2018	9,561.20	2017-09	ASR	
Highway Equipment Company	R02766	9/4/2018	10,920.00	2016-04	LXP	West Virgina
Highway Equipment Company	M06677	9/7/2018	11,914.03	2017-09	ASR	Damages
Highway Equipment Company	R05753	9/12/2018	9,561.20	2017-09	ASR	
Highway Equipment Company	R05754	9/12/2018	9,561.20	2017-09	ASR	
Highway Equipment Company	P00085	9/19/2018	3,979.24	2017-09	ASR	
Highway Equipment Company	Late Fee	9/30/2018	434.22	2017-09	ASR	
Highway Equipment Company	R02908	10/2/2018	7,800.00	2016-04	LXP	West Virgina
Highway Equipment Company	R05841	10/10/2018	2,459.20	2017-09	ASR	
Highway Equipment Company	R05842	10/10/2018	9,561.20	2017-09	ASR	
Highway Equipment Company	R19758	11/5/2018	2,459.20	Precision Pipeline	ETP	Considered a Precision rental --Dates 11/2 -11/29 on ETP Morgantown
Highway Equipment Company	D05205	12/26/2018	9,276.40	2017-09	ASR	
Highway Equipment Company	D03290	12/26/2018	10,920.00	2018-01	MXP	Entered as R03290 Not "D"03290; WV
			130,653.32			

EXHIBIT B

Case 18-12378-KG Doc 985 Filed 09/09/19 Page 22 of 26

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

IN RE: **WELDED CONSTRUCTION, L.P., et al., Debtors**	**Chapter 11**
	Case No. 18-12378 (KG)
	(Jointly Administered)
	Document No.
	Related to Document No. 963
	Hearing Date: **September 23, 2019 @ 10:00 a.m. (ET)**
	Response Deadline: **September 6, 2019 @ 4:00 p.m. (ET)**

ORDER OF COURT

Upon consideration of the Debtors' Eighth (8th) Omnibus (Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule3007-1; the Pometti Declaration; and the Response thereto filed by Highway Equipment Company, it is hereby **ORDERED, ADJUSTED, AND DECREED**, as follows:

a. The administrative claim of Highway Equipment Company as referenced in the Highway Equipment Company administrative claim is allowed with respect to Invoices number R03290, Z032935, R19758, Z03742, and M07227 and that payment thereof is authorized to be made by the debtor-in-possession;

b. The administrative claim for payment of invoice #D05205 is denied as the aforesaid claim has previously been paid pursuant to a bond claim.

United States Bankruptcy Judge

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

2019 SEP -6 AM 10:51

IN RE: **WELDED CONSTRUCTION, L.P., et al., Debtors**	:	**Chapter 11**
	:	**Case No. 18-12378 (KG)**
	:	**(Jointly Administered)**
	:	**Document No.**
	:	**Related to Document No. 963**
	:	**Hearing Date:** **September 123, 2019 @ 10:00 a.m.**
	:	**Response Deadline:** **September 6, 2019 @ 4:00 p.m.**

CERTIFICATE OF SERVICE OF HIGHWAY EQUIPMENT COMPANY'S RESPONSE TO DEBTORS' EIGHTH (8TH) OMNIBUS (Substantive) OBJECTIONS TO CLAIM OF HIGHWAY EQUIPMENT COMPANY

I, DAVID ABRAMS, ESQUIRE, certify under penalty of perjury that I served Highway Equipment Company's Response to the Debtors' Eighth (8th) Omnibus (Substantive) Objections to Administrative Claim of Highway Equipment Company on the parties at the addresses listed below on the 4th day of September, 2019, in the following manner:

FIRST CLASS MAIL, POSTAGE FULLY PREPAID

KCC - Kurtzman Carson Consultants
Kurtzman Carson Consultants
1290 Avenue of the Americas
9th Floor
New York, NY 10104
Claims Agent/Service Agent/Noticing Agent for Welded Construction, L.P. et al. for service on all interested parties
Weldedinfo@kccllc.com

ELECTRONIC SERVICE EMAIL BELOW/CE-ECF/SERVICE BY NEF AT ADDRESSES LISTED BELOW:

John E. Lucian, Esquire
Blank Rome
130 North 18th Street
Philadelphia, PA 19103
Phone: 215-569-5442
FAX: 215-832-5442
Lucian@BlankRome.com
Attorney for Official Committee of Unsecured Creditors

Michael B. Shaedle, Esquire
Blank Rome
130 North 18th Street
Philadelphia, PA 19103
Phone: 215-569-5762
FAX: 215-832-5762
Shaedle@BlankRome.com
Attorney for Official Committee of Unsecured Creditors

Jose F. Bilbiloni, Esquire
Blank Rome
1201 N. Market Street
Suite 800
Wilmington, DE 19801
Phone: 302-425-6498
FAX: 215-689-2753
JBilbiloni@BlankRome.com
Attorney for Official Committee of Unsecured Creditors

Josef W. Mintz Esquire
Blank Rome
1201 N. Market Street
Suite 800
Wilmington, DE 19801
Phone: 302-425-6478
FAX: 215-832-5528
Mintz@BlankRome.com
Attorney for Official Committee of Unsecured Creditors

Betsy Feldman, Esquire
Young Conaway Stargatt & Taylor, L.L.P.
Rodney Square
1000 North King Street
Wilmington, DE 19801
Phone: 302-571-6600
FAX: 302-571-1253
bfeldman@cst.com
Attorney for the debtors, Welded Construction, L.P., et al.

Jackie Weissberger, Esquire
U.S. Trustee for the District of Delaware
844 King Street, Suite 2207
Lock Box 35
Wilmington, DE 19899-0035
Phone: 302-573-6491
FAX: 302-573-6497
Jaclyn.Weissberger@usdoj.gov

Jane Leamy, Esquire
U.S. Trustee for the District of Delaware
844 King Street, Suite 2207
Lock Box 35
Wilmington, DE 19899-0035
Phone: 302-573-6491
FAX: 302-573-6497
Jane.M.Leamy@usdoj.gov

The total number of parties served was 8.

EXECUTED ON: September 4, 2019

By: /s/David Abrams, Esquire
DAVID ABRAMS, ESQUIRE
ABRAMS LAW FIRM
12A N. Meadowcroft Ave.
Pittsburgh, PA 15216
Pa. Supreme Court No. 15983
Telephone: (412) 207-9520
Facsimile: (412) 207-9531
Pa. Supreme Ct. #15983