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

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

**NOTICE OF WITHDRAWAL OF APPEARANCE**

**PLEASE TAKE NOTICE** that Morris James LLP hereby withdraws its appearance as counsel for Pipeline Industry Benefit Fund ("PIBF")[2], the Pipeliners Local Union 798 (the "Union"), the Operating Engineers' Local 324 Fringe Benefit Funds (the "Operators")[3], and the Michigan Laborers' Fringe Benefit Funds (the "Laborers", and collectively with the PIBF and the Operators, the "Funds")[4], in these bankruptcy cases, and requests that Morris James LLP be removed from any applicable service lists herein on behalf of the Union and the Funds including the Court's CM/ECF electronic notification list.

**PLEASE TAKE FURTHER NOTICE** that Maddin Hauser Roth & Heller P.C. will continue to represent the Union and the Funds in this Case.

[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] The PIBF consists of the Pipeline Industry Benefit Fund, the Pipeline Industry Pension Fund, the Pipeline Industry Annuity/401(k) Fund, the UA Local 798 Training Center, the UA International Training Fund, and the Pipeline Industry Advancement Fund.

[3] The Operating Engineers' Local 324 Fringe Benefit Funds consist of the Operating Engineers' Local 324 Health Care Plan, the Operating Engineers' Local 324 Pension Fund, the Operating Engineers' Local 324 Retiree Benefit Fund, the Operating Engineers' Local 324 Vacation and Holiday Fund, the Operating Engineers' Local 324 Supplemental Vacation Fund, the Operating Engineers' Local 324 Journeyman and Apprenticeship Training Fund, the Operating Engineers' Local 324 Labor-Management Education Committee, and the Operating Engineers' Local 324 Defined Contribution Pension Plan.

[4] The Michigan Laborers' Fringe Benefit Funds consist of the Michigan Laborers' Health Care Fund, the Michigan Laborers' Vacation Fund, the Michigan Laborers' Training Fund, the Michigan Laborers' Pension Fund, the Michigan Laborers' Labor and Management Training Fund, and the Michigan Laborers' Industry Advancement Fund.



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Dated: April 29, 2026

**MORRIS JAMES LLP**

*/s/ Carl N. Kunz, III*

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*Withdrawing Counsel to the Pipeline Industry Benefit Fund, the Pipeliners Local Union No. 798, the Operating Engineers' Local 324 Fringe Benefit Funds, and the Michigan Laborers' Fringe Benefit Funds*