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)
	:	**Hearing Date: 8/17/2026 at 11:00 a.m. (ET)** **Objection Deadline: 7/24/2026 at 4:00 p.m. (ET)**

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 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, hereby submit this motion (this "Motion") for the entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), pursuant to Rules 9006 and 9027 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), extending through and including January 11, 2027, each of: (i) the period within which the Post-Effective Date Debtors and their estates may remove actions pursuant to 28 U.S.C. § 1452 (the "Removal Deadline"); and (ii) the deadline to object to claims filed against the Debtors (the "Claim Objection Deadline"). In support of this Motion, the Post-Effective Date Debtors respectfully state as follows:

[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.

JURISDICTION AND VENUE

1. The Court has jurisdiction over this matter pursuant to 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. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Pursuant to Rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), the Post-Effective Date Debtors consent to the entry of a final order by the Court in connection with this Motion to the extent it is later determined the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution. Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The predicates for the relief requested in this Motion are 28 U.S.C. § 1452, 11 U.S.C. § 105(a), and Bankruptcy Rules 9006 and 9027.

BACKGROUND

2. On October 22, 2018 (the "Petition Date"), each of the Debtors filed with this Court a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

3. On January 10, 2019, the Court entered an order [D.I. 403] establishing (i) February 28, 2019, at 5:00 p.m. (Eastern Time) as the general bar date for filing proofs of claim that arose prior to the Petition Date, including requests for allowance and payment of claims under section 503(b)(9) of the Bankruptcy Code, and (ii) April 22, 2019, at 5:00 p.m. (Eastern Time) as the deadline for filing proofs of claim by governmental units. Notice of the foregoing deadlines was mailed to all parties known to the Debtors as having potential claims against the Debtors' estates and was published in the national edition of *USA Today*.

4. On March 11, 2019, the Court entered an order [D.I. 554] establishing April 30, 2019, at 5:00 p.m. (Eastern Time) as the deadline for filing requests for the allowance of

administrative expenses that arose during the period from the Petition Date through and including March 31, 2019. Notice of the administrative bar date was mailed to the Debtors' known creditors.

5. On June 25, 2020, the Court entered an order confirming the *Amended Chapter 11 Plan of Welded Construction, L.P. and Welded Construction Michigan, LLC* (the "Plan").[2]

6. On July 31, 2020 (the "Effective Date"), the Plan became effective. On that same date, the Plan Administrator was appointed and empowered to, among other things, implement the terms of the Plan; resolve claims against the estates; liquidate the estates' assets; prosecute, compromise, resolve, or withdraw causes of action; and otherwise wind down the estates.

7. The Debtors have filed seventeen motions[3] seeking to extend the Removal Deadline. The most recent extension motion was filed on January 2, 2026 [D.I. 2053]. On January 21, 2026, the Court entered an order granting the motion and extending the Removal Deadline to July 13, 2026, without prejudice to the rights of the Debtors and their estates to seek further extensions of the Removal Deadline [D.I. 2057].

8. The Plan gives the Post-Effective Date Debtors and the Plan Administrator the authority to reconcile Disputed Claims asserted against the Debtors. *See generally* Plan, Art. VIII.

9. The current Claim Objection Deadline is July 13, 2026, which was extended by order of the Court from the original deadline under the Plan. *See* D.I. 2057; Plan §§ 1.23, 8.2. Section 8.2 of the Plan also provides, *inter alia*, that the Claim Objection Deadline may be extended on motion filed by the Post-Effective Date Debtors, and that the filing of such a motion to extend the Claim Objection Deadline shall automatically extend the Claim Objection Deadline until a final order is entered by the Bankruptcy Court. *See* Plan § 8.2.

[2] Capitalized terms not defined herein shall have the meanings assigned in the Plan.

[3] *See* D.I. 427, 739, 987, 1185, 1384, 1593, 1701, 1740, 1843, 1871, 1902, 1931, 1986, 1998, 2022, 2035, and 2052 (collectively, the "Prior Extension Motions").

10. According to Verita,[4] the claims agent appointed in these cases, to date over 800 claims have been filed in these cases. All proofs of claims filed in these cases are recorded on the official claims register maintained by the claims agent.

RELIEF REQUESTED

11. By this Motion, the Post-Effective Date Debtors request that the Court enter the Proposed Order, substantially in the form attached to this Motion as **Exhibit A**, further extending the Removal Deadline and Claim Objection Deadline, each by 180 days, through and including January 11, 2027,[5] without prejudice to the rights of the Post-Effective Date Debtors to seek further extensions of the time within which to remove actions and related proceedings and to object to Claims filed against the Debtors.[6]

A. Cause Exists to Extend the Removal Deadline.

12. Bankruptcy Rule 9027 and 28 U.S.C. § 1452 govern the removal of pending civil actions. Section 1452(a) provides that:

> (a) A party may remove any claim or cause of action in a civil action other than a proceeding before the United States Tax Court or a civil action by a governmental unit to enforce such governmental unit's police or regulatory power, to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title.

28 U.S.C. § 1452(a).

13. Bankruptcy Rule 9027(a)(2) provides in relevant part that:

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[4] On or about June 11, 2024, Kurtzman Carson Consultants, LLC, the court-approved claims and noticing agent in these cases rebranded as Verita Global.

[5] 180 days after July 13, 2026 is January 9, 2027, which is a Saturday. Pursuant to Bankruptcy Rule 9006(a)(1)(C), "[w]hen the period is stated in days or a longer unit of time…include the last day of the period, but if the last day is a Saturday, Sunday or legal holiday, the period continues to run until the end of the next day that is not a Saturday, Sunday, or legal holiday."

[6] Pursuant to Local Rule 9006-2, the filing of this Motion prior to the expiration of the current Removal Deadline and Claim Objection Deadline automatically extends the Removal Deadline and Claim Objection Deadline until the Court acts on this Motion without the necessity for entry of a bridge order.

> [i]f the claim or cause of action in a civil action is pending when a case under the [Bankruptcy] Code is commenced, a notice of removal may be filed in the bankruptcy court only within the longest of (A) 90 days after the order for relief in the case under the Code, (B) 30 days after entry of an order terminating a stay, if the claim or cause of action in a civil action has been stayed under § 362 of the Code, or (C) 30 days after a trustee qualifies in a chapter 11 reorganization case but not later than 180 days after the order for relief.

Fed. R. Bankr. P. 9027(a)(2).

14. Bankruptcy Rule 9006 permits the Court to extend the Removal Deadline and provides in relevant part:

> [W]hen an act is required or allowed to be done at or within a specified period by [the Bankruptcy Rules] or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion . . . with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order . . . .

Fed. R. Bankr. P. 9006(b)(1).

15. It is well settled that the Court is authorized to extend, for cause, the removal period provided under 28 U.S.C. § 1452 and Bankruptcy Rule 9027. *See, e.g.*, *Pacor, Inc. v. Higgins*, 743 F.2d 984, 996 n.17 (3d Cir. 1984), *overruled on other grounds by Things Remembered, Inc. v. Petrarca*, 516 U.S. 124, 134-35 (1995) (stating the bankruptcy court's power to grant an extension of the removal period pursuant to Bankruptcy Rule 9006(b) is "clear"); *Raff v. Gordon*, 58 B.R. 988, 991 (Bankr. E.D. Pa. 1986) (stating the period in which to file a motion to remove may be expanded pursuant to Bankruptcy Rule 9006); *see also e.g.*, *Jandous Elec. Constr. Corp. v. City of New York (In re Jandous Elec. Constr. Corp.)*, 106 B.R. 48, 50 (Bankr. S.D.N.Y. 1989) (same); *In re World Fin. Servs. Ctr., Inc.*, 81 B.R. 33, 39 (Bankr. S.D. Cal. 1987) (noting the U.S. Supreme Court intended to give Bankruptcy Courts the power to enlarge the removal period under Bankruptcy Rule 9027(a) pursuant to Bankruptcy Rule 9006(b)).

16. As of the Petition Date, the Debtors were parties to actions pending in the courts of certain states and federal districts and some actions were filed against the Debtors postpetition that were stayed under the Bankruptcy Code (collectively, the "Actions"). Some of the Actions may be subject to removal pursuant to 28 U.S.C. § 1452. As such, the Post-Effective Date Debtors believe it is prudent to seek an extension of the time established by Bankruptcy Rule 9027 to protect their right and the right of their estates to seek to remove such Actions to this Court.

17. The Post-Effective Date Debtors submit that extending the current Removal Deadline is essential and is in the best interests of their estates and creditors. As discussed below, and as further discussed in the Prior Extension Motions, the Post-Effective Date Debtors and the Debtors before them have worked diligently to, among other things, ensure the smooth transition of the Debtors' operations into chapter 11, preserve and maximize the value of the Debtors' estates for the benefit of all stakeholders, and negotiate with their major constituencies in a concerted effort to ensure a consensual process. Such efforts resulted in a consensual chapter 11 Plan that was overwhelmingly supported by creditors, confirmed by this Court, and became effective on July 31, 2020.

18. Since the Effective Date, the Plan Administrator and the Post-Effective Date Debtors' professionals have worked diligently to, among other things, attend to emergent matters, coordinate distributions to holders of Allowed Convenience Claims, reconcile and object to proofs of Claim filed in these chapter 11 cases, prosecute both Avoidance Actions and Retained Causes of Action, including the recently resolved adversary proceeding against the Williams Companies and certain affiliates (the "Williams Litigation") and the still-pending adversary proceeding against Industrial Fabrics (Adv. Proc. No. 20-ap-50932) (the "Industrial Fabrics Litigation"),[7] and chart a

[7] Competing motions for summary judgement were filed in he Industrial Fabrics Litigation and a notices of completion of briefing were filed in June, 2022 and are ripe for ruling by the Court. *See* Industrial Fabrics Litigation, D.I., 64,

path to efficiently and expeditiously wind up these estates in a manner that maximizes the value of the estates' assets.

19. In addition to the activities detailed in the Prior Extension Motions, which are incorporated herein by reference and further support the relief requested herein, since the Court's entry of the prior extension order, the Post-Effective Date Debtors and the Debtors before them have, among other things:

(i) continued to prosecute, defend or resolve, as applicable, all pending adversary proceedings, including the Williams Litigation;

(ii) continued to prosecute Avoidance Actions including the still pending Industrial Fabrics Litigation, which to date has resulted in material recoveries of prepetition transfers; and

(iii) handled various tasks related to the administration of the estates and these chapter 11 cases, including responded to various inquiries from creditors and interested parties.

20. As a result of the foregoing and other efforts, the Post-Effective Date Debtors have not had sufficient time to determine whether the Actions should be removed pursuant to Bankruptcy Rule 9027(a). The extension sought will afford the Post-Effective Date Debtors an opportunity to make more fully informed decisions concerning the removal of any Actions, and will ensure the Debtors and their estates do not forfeit the valuable rights afforded to them under 28 U.S.C. § 1452.

21. At the same time, extending the Removal Deadline as requested herein will not prejudice the rights of any other parties to the Actions because, in many (if not all) circumstances, such parties may not prosecute the Actions absent relief from the automatic stay. In addition, nothing contained in this Motion is intended to prejudice the rights of any party to an Action, which the Post-Effective Date Debtors ultimately may seek to remove, because such parties retain

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the right to seek remand of any such Action as provided under 28 U.S.C. § 1452(b) at the appropriate time.

22. For the reasons set forth above, the Post-Effective Date Debtors respectfully submit extending the current Removal Deadline through and including January 11, 2027 is necessary, prudent, and in the best interests of the estates and creditors.

B. Cause Exists to Extend the Claim Objection Deadline.

23. Since the Effective Date, as set forth more fully above, the Post-Effective Date Debtors and the Plan Administrator have been engaged in a wide range of activities related to claims reconciliation, including: (i) negotiating with various creditors in order to resolve disputes regarding their proofs of claim and requests for payment of administrative expenses; (ii) continuing to reconcile the more than 800 administrative, priority and secured Claims that have been filed in these cases in order to determine which Claims can be allowed and which will require further review and/or objections; and (iii) continuing to analyze claims data.

24. Notwithstanding these efforts, the analysis and reconciliation of the claims is ongoing, and an extension of the Claim Objection Deadline is necessary for the Post-Effective Date Debtors and the Plan Administrator to fully review and, as necessary, object to claims asserted against the Debtors.

25. As noted above, to date, approximately 800 claims have been asserted against the Debtors. Given the magnitude of the claims and the volume of data involved, the extension requested herein is necessary to enable the Post-Effective Date Debtors and the Plan Administrator to continue this process without the need to commence litigation prematurely. Further, the Post-Effective Date Debtors and the Plan Administrator are prosecuting Retained Causes of Action,

including Avoidance Actions and the Williams Litigation, which also includes existing claim objections and may necessitate objections to certain additional Claims in the future.

26. Without additional time to investigate and if necessary object to proofs of claim, the Post-Effective Date Debtors and the Plan Administrator could be forced to allow Claims that would otherwise be objectionable to the detriment of all creditors.

27. Bankruptcy Rule 9006 permits the Court to extend the Claim Objection Deadline. *See* ¶ 14, *supra*. While not required by the Plan, as detailed above, ample cause exists to extend the Claim Objection Deadline. Accordingly, the Claim Objection Deadline should be extended by 180 days to and including January 11, 2027, to permit the orderly and efficient administration of the estates and distribution of the Debtors' assets.

28. As this process continues, and during the proposed extension period, the Post-Effective Date Debtors and the Plan Administrator anticipate that they will continue to prepare and file further objections to claims and continue efforts to resolve all claims expeditiously. The Post-Effective Date Debtors and the Plan Administrator reserve the right to seek further extensions of the Claim Objection Deadline as necessary.

NOTICE

29. Notice of this Motion has been provided to the following parties or their counsel of record, if known: (i) the Office of the United States Trustee for the District of Delaware; (ii) all known parties to the Actions; and (iii) all parties that have requested to receive in these cases notices pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested herein, the Post-Effective Date Debtors submit no other or further notice is necessary.

PRIOR REQUESTS

30. The Court has granted seventeen prior extensions of the Removal Deadline. *See* Orders at D.I. 470, 772, 1009, 1204, 1413, 1616, 1717, 1749, 1848, 1875, 1910, 1940, 1991, 2004, 2026, 2039 & 2057.

31. The Court has granted eleven prior extensions of the Claim Objection Deadline. *See* Orders at D.I. 1717, 1749, 1848, 1875, 1910, 1940, 1991, 2004, 2026, 2039 & 2057.

CONCLUSION

WHEREFORE the Post-Effective Date Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached to this Motion as **Exhibit A**, granting the relief requested in this Motion extending the Removal Deadline and Claim Objection Deadline to January 11, 2027, and granting the Post-Effective Date Debtors such further relief as may be just and proper under the circumstances.

Dated: July 10, 2026
Wilmington, Delaware

BLANK ROME LLP

/s/ Josef W. Mintz

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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)
	:	**Hearing Date: 8/17/2026 at 11:00 a.m. (ET)** **Objection Deadline: 7/24/2026 at 4:00 p.m. (ET)**

NOTICE OF 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

PLEASE TAKE NOTICE that on July 10, 2026, 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* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court"). By the Motion, the Post-Effective Date Debtors seek the entry of an order pursuant to Rules 9006 and 9027 of the Federal Rules of Bankruptcy Procedure (i) extending the period within which the Post-Effective Date Debtors and their estates may file notices of removal of claims and causes of action pursuant to 28 U.S.C. § 1452 and (ii) extending the deadline to object to claims filed against the Debtors from the current deadline of July 13, 2026, through and including January 11, 2027.

Any responses or objections to the Motion must be (i) filed in writing with the Clerk of the Bankruptcy Court, 824 N. Market Street, Third Floor, Wilmington, Delaware 19801, on or before **July 24, 2026 at 4:00 p.m. (prevailing Eastern Time)** (the "Objection Deadline"); and (ii) served on the undersigned counsel to the Post-Effective Date Debtors so as to be received on or before the Objection Deadline.

If a response or objection is timely filed, served and received and is not otherwise resolved, a hearing to consider the relief requested in the Motion and any response or objection thereto will be held before the Honorable Laurie Selber Silverstein, Judge of the United States Bankruptcy

[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.

Court for the District of Delaware, Sixth Floor, Courtroom 2, 824 N. Market Street, Wilmington, Delaware 19801 on **August 17, 2026 at 11:00 a.m. (prevailing Eastern Time)**.

IF NO OBJECTIONS OR RESPONSES TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: July 10, 2026
Wilmington, Delaware

BLANK ROME LLP

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EXHIBIT A

Proposed Order

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. __**

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 11, 2027; 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 of the Constitution; and upon the record of the chapter 11 cases; and this Court having determined

[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.

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 11, 2027 (the "Removal Deadline").

3. The deadline to object to all claims filed against the Debtors' estates is hereby extended through and including January 11, 2027 (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.