EIN 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: 9/30/2026 at 2:00 p.m. (ET)** **Response Deadline: 8/6/2026 at 4:00 p.m. (ET)**

POST-EFFECTIVE DATE DEBTORS' REPLY IN SUPPORT OF OBJECTION TO CLAIM NO. 844 PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3007

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 submits this reply (this "Reply") in further support of the *Post-Effective Date Debtors' Objection to Claim No. 844 Pursuant to Section 502 of the Bankruptcy Code and Bankruptcy Rule 3007* [D.I. 2078] (the "Objection")[2], and in response to the informal response received by Claimant on July 28, 2026. In support of this Reply, the Post-Effective Date Debtors rely upon the Supplemental Declaration of Frank A. Pometti (the "Supplemental Pometti Declaration"), filed contemporaneously herewith. In further support of this Reply, the Post-Effective Date Debtors respectfully represent as follows:

RELEVANT BACKGROUND

1. On July 16, 2026, the Post-Effective Date Debtors filed the Objection seeking to disallow and expunge Claim No. 844 (the "Claim") filed by Zachary A. Anderson ("Claimant")

[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 used but not otherwise defined herein have the meanings ascribed to them in the Objection.

1812378260924000000000001

on two independent grounds: (a) the Claim was filed nearly four years after the General Bar Date; and (b) the Claim is unsupported by any documentation or the Debtors' books and records.

2. No formal response to the Objection was filed by the Response Deadline of August 6, 2026 at 4:00 p.m. (ET). Notwithstanding, the Post-Effective Date Debtors did receive an informal communication from Claimant on July 28, 2026 indicating that the Claim relates to pension and/or union benefit payments that Claimant believes were never paid in connection with his prior employment with Welded Construction L.P.

3. Upon receipt of Claimant's informal communication, the Post-Effective Date Debtors undertook a review of Welded's books and records, including Welded's records of payments made to the Laborers' International Union of North America (the "Union"), to determine whether any obligation or liability was owed to Claimant. That review confirmed that Welded reported all hours worked by Claimant and paid all dues relating to Claimant's prior employment to the Union.[3]

4. On August 6, 2026, counsel for the Post-Effective Date Debtors sent a detailed letter to Claimant (the "Response Letter") explaining the Post-Effective Date Debtors' position regarding the Claim, enclosing supporting documentation, and requesting that Claimant voluntarily withdraw the Claim. A true and correct copy of the Response Letter is attached as **Exhibit A**. As of the date of this Reply, no response to the Response Letter has been received from Claimant, nor has Claimant responded to any follow up correspondence from counsel for the Post-Effective Date Debtors.[4]

[3] True and correct copies of the records reflecting such proper reporting and payment are attached to the Response Letter (as defined below), which is attached to the Supplemental Pometti Declaration as Exhibit 1.

[4] On each of August 7, 2026 and September 14, 2026, counsel for the Post-Effective Date Debtors attempted to connect with Claimant via both phone and email correspondence to discuss a potential resolution to the Objection. Notwithstanding, Claimant has failed to respond to counsel in any fashion. A true and correct copy of the email chain with Claimant is attached hereto as **Exhibit B**.

REPLY

5. As set forth in the Response Letter and the Supplemental Pometti Declaration, any pension or union benefits amounts Claimant believes are actually owed in connection with his brief employment with Welded would be payable by the Union, not Welded. Supplemental Pometti Declaration ¶ 5.

6. Welded's books and records confirm that Welded properly reported all of Claimant's hours worked and paid all required dues to the Union in connection with Claimant's employment. *Id.*. Accordingly, Welded has no outstanding pension obligation or liability to Claimant, and any dispute Claimant may have regarding unpaid pension or union benefits must be directed to the Union.

7. For these reasons alone, because the Claim does not state a valid claim against Welded, it should be disallowed pursuant to section 502(b)(1) of the Bankruptcy Code.

8. Even if the Claim did state a valid claim against Welded (which it does not), the Claim was filed on January 1, 2023, nearly four years after the General Bar Date of February 28, 2019.

9. Notice of the Bar Date was mailed to all known potential creditors, including Claimant, at his last known address. *See* D.I. 428; Supplemental Pometti Declaration ¶ 6. Claimant has provided no justification for, nor has he sought any relief from this Court excusing his untimely filing. Accordingly, the Claim should also be disallowed as late-filed pursuant to section 502(b)(9).

10. Finally, despite receiving proper notice of the Objection and the hearing thereon, Claimant failed to file a formal response by the Response Deadline, and therefore, pursuant to the Notice of the Objection, Claimant is "deemed to have concurred with and consented to the Objection and the relief requested therein."

11. Finally, given that Claimant is proceeding *pro se*, the Post-Effective Date Debtors undertook extensive efforts to connect with and explain in detail why the Claim lacks merit. However, to date, other than Claimant's intial informal response on July 28th, Claimant has not responded to or otherwise engaged with counsel for the Post-Effective Date Debtors. Accordingly, the Post-Effective Date Debtors file this Reply to provide the Court with the necessary record to sustain the Objection over Claimant's informal response.

CONCLUSION

WHEREFORE, for the reasons set forth herein and in the Objection, the Post-Effective Date Debtors respectfully request that the Court (a) enter the Proposed Order disallowing and expunging the Claim in its entirety, and (b) overrule Claimant's informal response; and (c) grant such other and further relief as is just and proper.

Dated: September 24, 2026
Wilmington, Delaware

BLANK ROME LLP

/s/ Josef W. Mintz

Josef W. Mintz (DE No. 5644)
Lawrence R. Thomas III (DE No. 6935)
Jordan L. Williams (DE No. 7128)
1201 Market Street, Suite 800
Wilmington, Delaware 19801
Telephone: (302) 425-6400
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Lorenzo.Thomas@BlankRome.com
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-and-

Michael B. Schaedle *(pro hac vice)*
John E. Lucian (*pro hac vice*)
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130 N. 18th Street
Philadelphia, Pennsylvania 19103
Telephone: (215) 569-5500
Email: Mike.Schaedle@BlankRome.com
John.Lucian@BlankRome.com

Counsel to the Post-Effective Date Debtors

EXHIBIT A

BLANKROME
1201 N. Market Street, Suite 800
Wilmington, DE 19801

Phone: *(302) 425-6478*
Email: *Josef.Mintz@blankrome.com*

August 6, 2026

VIA ELECTRONIC MAIL AND OVERNIGHT MAIL

Zachary A. Anderson
67 Skyline Drive
Moundsville, WV 26041
Bigdaddyzac2@gmail.com

Re: In re: Welded Construction, L.P., *et al.* (collectively "Welded"); Case No. 18-12378(LSS) (the "Bankruptcy Case") in the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court")

Dear Mr. Anderson:

As you are aware, Blank Rome LLP represents Cullen D. Speckhart, in her capacity as Plan Administrator, in connection with the Bankruptcy Case. We write in connection with your proof of claim, Claim No. 844 (the "Claim"), which you filed against debtor Welded Construction, L.P. on January 1, 2023, and the Plan Administrator's objection to that Claim filed on June 16, 2026 [Docket No. 2078] (the "Objection").

Because you have not provided any evidence of Welded's liability for the Claim and our client's position in the Objection is clear, we write to request that you withdraw the Claim.

We understand that the Claim relates to amounts you believe should have been paid into your union pension fund in connection with your prior employment with Welded. Such amounts, if any are actually owed to you, would be payable by your Union, not Welded. After a review of Welded's records, including Welded's record of payment to the Laborers' International Union of North America (the "Union"), Welded reported all hours and paid all dues relating to your prior employment. We have enclosed copies of Welded's reports along these lines, which confirm that all amounts were properly paid and reported to the Union.[1] If you believe you are still owed amounts by the Union, please contact the Union directly.

Further, even if your Claim stated an actionable claim against Welded (which it does not),

[1] True and correct copies of Welded's records reflecting Welded's proper reporting of work hours and payment of Union dues are attached hereto as **Exhibits A and B**, respectively.

BLANKROME

your Claim is subject to disallowance because it was filed well after the applicable deadline. In a bankruptcy case, there is a deadline called the "bar date", by which all creditors must file their claims. In Welded's case, that deadline was February 28, 2019 (the "Bar Date"). A notice of the Bar Date was docketed on January 11, 2019 [Docket No. 407] and mailed to all known potential creditors, including yourself, to your last known address in Welded's records. A copy of the relevant portion of the applicable Affidavit of Service, Docket No. 428, is enclosed. Please see PDF page 3.[2] Your claim was not filed until January 1, 2023, which is nearly four years after the Bar Date. Thus, even if Welded did owe you any amounts for your Claim (which it does not), any recovery on account of your untimely Claim would be inequitable and contrary to well established law.

A hearing to consider the Objection to your Claim is currently scheduled for **August 17, 2026 at 11:00 a.m. (Eastern Time)** before the Bankruptcy Court, Honorable Laurie Selber Silverstein, in Wilmington, Delaware. The notice of the hearing, including participation instructions, were previously served upon you, but are enclosed for convenience.[3] However, given that Welded clearly has no liability on your Claim, and given further that your Claim was filed well after the Bar Date, **we respectfully request that you voluntarily withdraw your Claim ahead of the hearing**. Withdrawing your Claim would save you, the Bankruptcy Court, and the Plan Administrator the time and expense of litigating this matter any further. If you wish to withdraw your Claim, we will assist you with preparing the applicable paperwork.

If you would instead prefer to proceed with the hearing, that is your right, and we will be prepared to present our position to the Court at that time. However, we believe it would be in everyone's best interest to resolve this matter consensually, if possible.

Should you have questions, please contact my associate Jordan Williams at (302) 425-6417 or by email at Jordan.Williams@blankrome.com.

Very truly yours,

/s/ Josef W. Mintz

Josef W. Mintz, Esq.

Cc: Jordan Williams, Esq.

[2] A true and correct copy of the Affidavit of Service reflecting service at your last known address is attached hereto as **Exhibit C**.
[3] A notice of the hearing on the Objection, including participation instructions, is attached hereto as **Exhibit D**.

BLANKROME
1201 N. Market Street, Suite 800
Wilmington, DE 19801

EXHIBIT A

00 Union Steward Report
Welded Construction LP (15378)

Check Date: 08/03/2018
Processes: 2018072702 - 2018080301
Pay Period: 07/23/2018 - 07/29/2018

UNION CODE: 201801 LB Local 1149 (WV) (201801LB)

Name	SSN	Home Union	Union Hours	Pay Rate	Hire Date	Rehire Date	Class	Term Date	Term Reason
LABORCLASS: Laborer (LB01)									
[redacted]									
Anderson, Zachary A.	[redacted]	LB 1149	49.00	27.43	5/30/2018		LB01	7/28/2018	Safety
[redacted]									

BLANKROME
1201 N. Market Street, Suite 800
Wilmington, DE 19801

EXHIBIT B

Laborers-Employers Benefit Plan Collection Trust

P.O. Box 94491, Chicago, IL 60690-4491
Phone (202) 393-7344 Fax (202) 393-7352 Toll Free 1-800-562-1181

Attention Employers:

One of the following MUST be attached to this report:

1. The Form B2 supplied by LEBPCT for listing individual employee hours;
2. A report generated by your own computer system containing the same information.

Mail this report and attachments along with a check to the above address for receipt no later than the 15th of the month following the month the employees worked. Checks received after that date may be subject to a late fee of 1 1/2% per month, compounded monthly.

Employer:

Company Name: Welded Construction, L.P.
Address: P.O. Box 470, Perrysburg, OH 43552-0470

Please complete all the requested information:

1. Last day of pay period covered by this report: 7/29/2018
2. Project Name: Columbia Gas - MXP
   Counties: Marshall County, WV
   City: Tridelphia State: WV
   Yard Is Located in OH
3. _____ Completion Date, FINAL report for this job site.
4. 1149 Laborers' Local Union number (Jurisdictional Local Union)

Benefit Codes	
A -	Health & Welfare
B -	Annuity
C -	Pension
D -	Legal Fund
E -	Vacation Fund
F -	Local LECET
G -	Training Fund
H -	**LOCAL PAC**
I -	
J -	Laborers' Political League (LPL)
K -	Administrative Fund
L -	Contract Compliance
M -	Defined Contributions
N -	Dental
O -	Education
P -	Sub
Q -	Fair Contracting
R -	Industry Advancement
S -	Other (Attach explanation)

5. Employee benefit deductions:

Benefit Code	Hours x	Rate =	Amount
A	56,902	8.25	$ 469,441.50
B	56,902	2.50	$ 142,255.00
C	56,902	5.50	$ 312,961.00
F	56,902	0.15	$ 8,535.30
G	56,902	1.00	$ 56,902.00
H	-	0.00	$ -
			$ -
J	56,902	0.05	$ 2,845.10

	Hours	Total
6. Benefit Totals	56,902	$ 992,939.90
7. LEBPCT* (.06 per hr.)	56,902	$ 3,414.12
8. Pipeline Lecet (.10 per hr.)	56,902	$ 5,690.20
9. Working Dues**		$ 105,153.98
10. Union/Book Fees**		
11. Report Total		$ 1,107,198.20
12. Check Amount for ALL Reports		$ 1,107,198.20

* All employers MUST complete this entry. $ -
** Please attach all supporting payroll documentation.

13. This report prepared by:

Brandi L. Stannert
Signature

Date: 8/15/2018

(419) 874-3548
Phone

Brandi L., Stannert
Printed Name

E-mail: payroll@welded.com

Fax

Welded Construction, L.P.
P.O. Box 470
Perrysburg, Ohio 43552

PERIOD ENDING: 29-Jul-18
PHONE: 419-874-3548

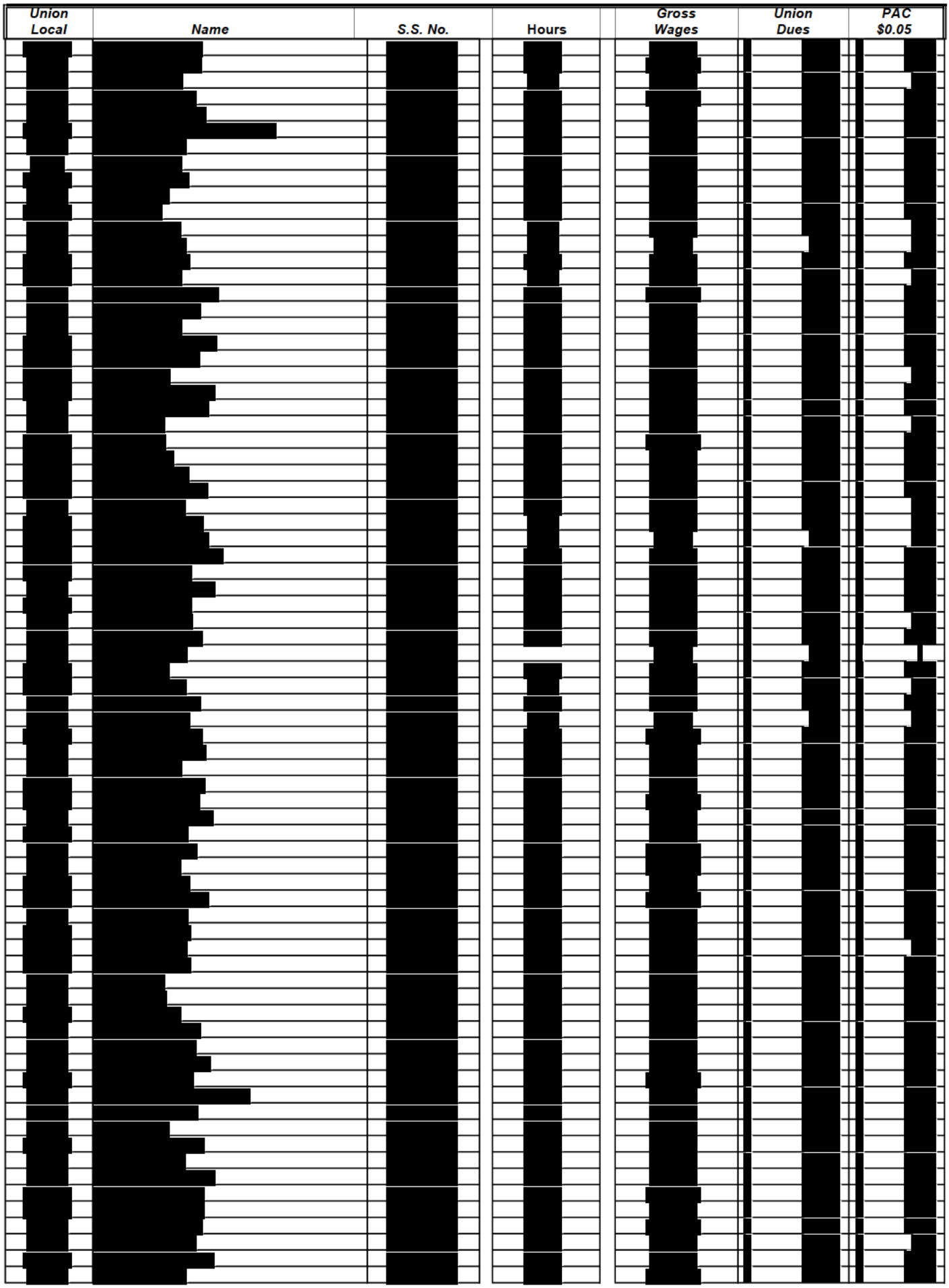
July 2018

JOB: Columbia Gas - MXP
Marshall County, WV

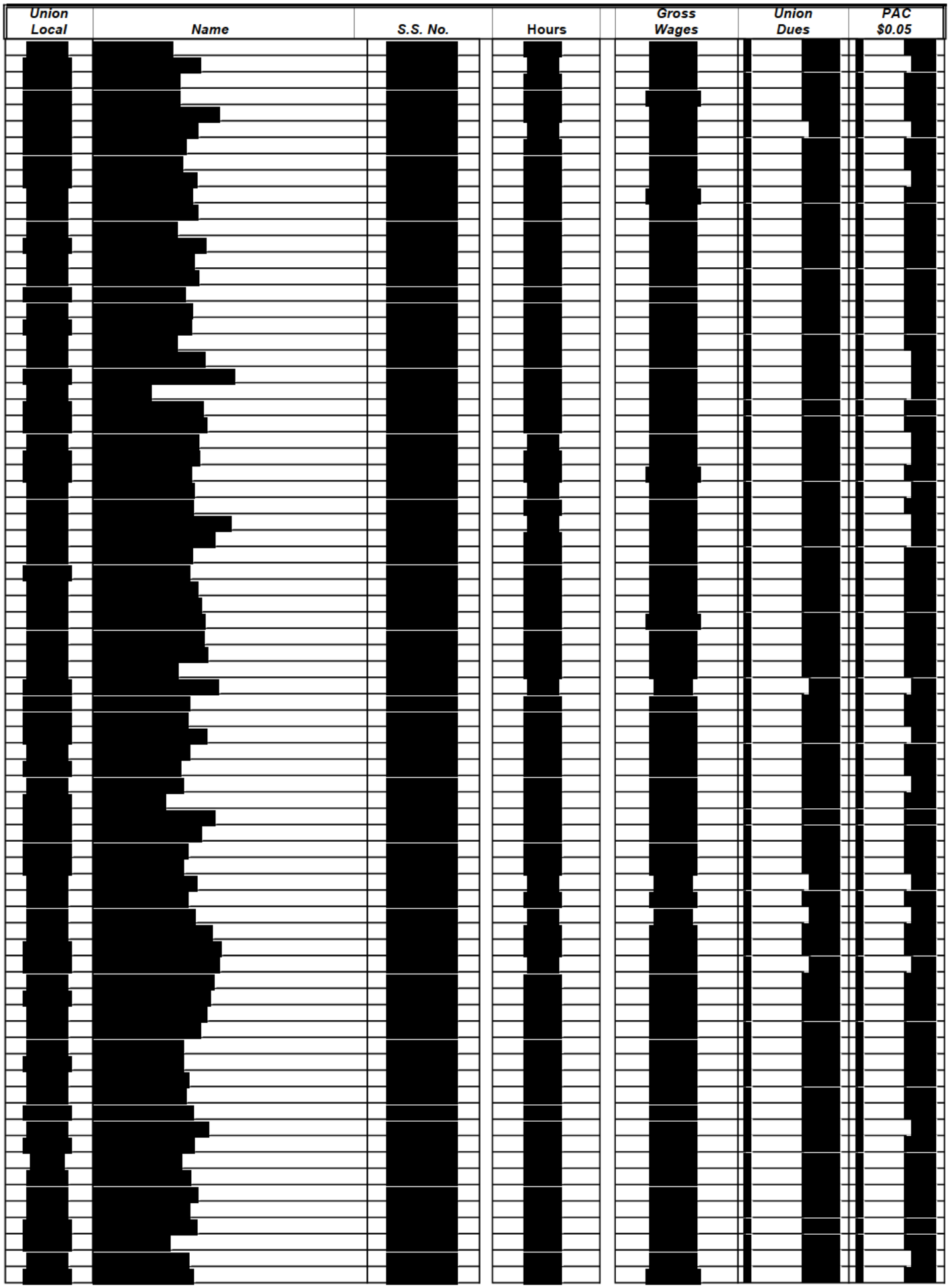
JOB NO.: 2018-01

LABORERS-EMPLOYERS BENEFIT PLAN COLLECTION TRUST
P.O. BOX 630771
BALTIMORE, MARYLAND 21263-0771

Union Local	Name	S.S. No.	Hours	Gross Wages	Union Dues	PAC $0.05
HOURLY EMPLOYEES:						
[redacted]						
LB 1149	Anderson, Zachary A.	[redacted]	270.00	9,298.78	$ 479.95	$ 13.50
[redacted]						



Union Local	Name	S.S. No.	Hours	Gross Wages	Union Dues	PAC $0.05



Union Local	Name	S.S. No.	Hours	Gross Wages	Union Dues	PAC $0.05

Union Local	Name	S.S. No.	Hours	Gross Wages	Union Dues	PAC $0.05
[redacted]						
					$ -	$ -
	Total Hourly:		53,692.00	$ 1,835,836.74	$ 94,910.27	$ 2,684.60
SALARIED EMPLOYEES:						
[redacted]						
					$ -	$ -
					$ -	$ -
	Total Salaried:		3,210.00	$ 223,992.83	$ 10,243.71	$ 160.50
	TOTALS:		**56,902.00**	**$ 2,059,829.57**	**$ 105,153.98**	**$ 2,845.10**

	Total Hours		Rate		Total	
A - Health & Welfare	56,902	x	8.25	= $	469,441.50	
B - Annuity	56,902	x	2.50	= $	142,255.00	
C - Pension	56,902	x	5.50	= $	312,961.00	
F - Local LECET	56,902	x	0.15	= $	8,535.30	
G - Training	56,902	x	1.00	= $	56,902.00	
LEBPCT	56,902	x	0.06	= $	3,414.12	
Pipeline LECET	56,902	x	0.10	= $	5,690.20	
LPL** (PAC)	56,902	x	0.05	= $	2,845.10	
Working Dues*	56,902	x	4% & .40	= $	105,153.98	Dues & Org. Due
					$ 1,107,198.20	

Laborers-Employers Benefit Plan Collection Trust

P.O. Box 94491, Chicago, IL 60690-4491
Phone (202) 393-7344 Fax (202) 393-7352 Toll Free 1-800-562-1181

Attention Employers:

One of the following MUST be attached to this report:

1. The Form B2 supplied by LEBPCT for listing individual employee hours;
2. A report generated by your own computer system containing the same information.

Mail this report and attachments along with a check to the above address for receipt no later than the 15th of the month following the month the employees worked. Checks received after that date may be subject to a late fee of 1 1/2% per month, compounded monthly.

Employer:

Company Name: Welded Construction, L.P.
Address: P.O. Box 470, Perrysburg, OH 43552-0470

Please complete all the requested information:

1. Last day of pay period covered by this report: 7/1/2018
2. Project Name: Columbia Gas - MXP
   Counties: Marshall County, WV
   City: Tridelphia State: WV
   Yard Is Located in OH
3. _____ Completion Date, FINAL report for this job site.
4. 1149 Laborers' Local Union number (Jurisdictional Local Union)

Benefit Codes	
A -	Health & Welfare
B -	Annuity
C -	Pension
D -	Legal Fund
E -	Vacation Fund
F -	Local LECET
G -	Training Fund
H -	**LOCAL PAC**
I -	
J -	Laborers' Political League (LPL)
K -	Administrative Fund
L -	Contract Compliance
M -	Defined Contributions
N -	Dental
O -	Education
P -	Sub
Q -	Fair Contracting
R -	Industry Advancement
S -	Other (Attach explanation)

5. Employee benefit deductions:

Benefit Code	Hours x	Rate =	Amount
A	45,061	8.25	$ 371,753.25
B	45,061	2.50	$ 112,652.50
C	45,061	5.50	$ 247,835.50
F	45,061	0.15	$ 6,759.15
G	45,061	1.00	$ 45,061.00
H	-	0.00	$ -
			$ -
J	45,061	0.05	$ 2,253.05

	Hours	Total
6. Benefit Totals	45,061	$ 786,314.45
7. LEBPCT* (.06 per hr.)	45,061	$ 2,703.66
8. Pipeline Lecet (.10 per hr.)	45,061	$ 4,506.10
9. Working Dues**		$ 83,956.61
10. Union/Book Fees**		
11. Report Total		$ 877,480.82
12. Check Amount for ALL Reports		$ 877,480.82

* All employers MUST complete this entry. $ -
** Please attach all supporting payroll documentation.

13. This report prepared by:

Brandi L. Stannert
Signature

Date: 7/10/2018

(419) 874-3548
Phone

Brandi L., Stannert
Printed Name

E-mail: payroll@welded.com

Fax

Welded Construction, L.P.
P.O. Box 470
Perrysburg, Ohio 43552

PERIOD ENDING: 1-Jul-18
PHONE: 419-874-3548

June 2018

JOB: Columbia Gas - MXP
Marshall County, WV

JOB NO.: 2018-01

LABORERS-EMPLOYERS BENEFIT PLAN COLLECTION TRUST
P.O. BOX 630771
BALTIMORE, MARYLAND 21263-0771

Union Local	Name	S.S. No.	Hours	Gross Wages	Union Dues	PAC $0.05
HOURLY EMPLOYEES:						
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
LB 1149	Anderson, Zachary A.	[redacted]	243.00	8,407.30	$ 433.49	$ 12.15
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

Union Local	Name	S.S. No.	Hours	Gross Wages	Union Dues	PAC $0.05
[redacted]						

Union Local	Name	S.S. No.	Hours	Gross Wages	Union Dues	PAC $0.05
[redacted]						

Union Local	Name	S.S. No.	Hours	Gross Wages	Union Dues	PAC $0.05
[redacted]					$ -	$ -
					$ -	$ -
	Total Hourly:		42,541.00	$ 1,481,673.26	$ 76,283.33	$ 2,127.05
SALARIED EMPLOYEES:						
[redacted]					$ -	$ -
					$ -	$ -
	Total Salaried:		2,520.00	$ 166,632.01	$ 7,673.28	$ 126.00
	TOTALS:		**45,061.00**	**$ 1,648,305.27**	**$ 83,956.61**	**$ 2,253.05**

	Total Hours		Rate		Total	
A - Health & Welfare	45,061	x	8.25	= $	371,753.25	
B - Annuity	45,061	x	2.50	= $	112,652.50	
C - Pension	45,061	x	5.50	= $	247,835.50	
F - Local LECET	45,061	x	0.15	= $	6,759.15	
G - Training	45,061	x	1.00	= $	45,061.00	
LEBPCT	45,061	x	0.06	= $	2,703.66	
Pipeline LECET	45,061	x	0.10	= $	4,506.10	
LPL** (PAC)	45,061	x	0.05	= $	2,253.05	
Working Dues*	45,061	x	4% & .40	= $	83,956.61	Dues & Org. Due
					$ 877,480.82	

Laborers-Employers Benefit Plan Collection Trust

P.O. Box 94491, Chicago, IL 60690-4491
Phone (202) 393-7344 Fax (202) 393-7352 Toll Free 1-800-562-1181

Attention Employers:

One of the following MUST be attached to this report:

1. The Form B2 supplied by LEBPCT for listing individual employee hours;
2. A report generated by your own computer system containing the same information.

Mail this report and attachments along with a check to the above address for receipt no later than the 15th of the month following the month the employees worked. Checks received after that date may be subject to a late fee of 1 1/2% per month, compounded monthly.

Employer:

Company Name: Welded Construction, L.P.
Address: P.O. Box 470, Perrysburg, OH 43552-0470

Please complete all the requested information:

1. Last day of pay period covered by this report: 6/3/2018
2. Project Name: Columbia Gas - Leach Express
   Counties: Marshall County, WV
   City: Tridelphia State: WV
   Yard Is Located in OH
3. _____ Completion Date, FINAL report for this job site.
4. 1149 Laborers' Local Union number (Jurisdictional Local Union)

Benefit Codes	
A -	Health & Welfare
B -	Annuity
C -	Pension
D -	Legal Fund
E -	Vacation Fund
F -	Local LECET
G -	Training Fund
H -	**LOCAL PAC**
I -	
J -	Laborers' Political League (LPL)
K -	Administrative Fund
L -	Contract Compliance
M -	Defined Contributions
N -	Dental
O -	Education
P -	Sub
Q -	Fair Contracting
R -	Industry Advancement
S -	Other (Attach explanation)

5. Employee benefit deductions:

Benefit Code	Hours x	Rate =	Amount
A	31,719	8.25	$ 261,681.75
B	31,719	2.50	$ 79,297.50
C	31,719	5.50	$ 174,454.50
F	31,719	0.15	$ 4,757.85
G	31,719	1.00	$ 31,719.00
H	-	0.00	$ -
			$ -
J	-	0.05	$ -

	Hours	Total
6. Benefit Totals	31,719	$ 551,910.60
7. LEBPCT* (.05 per hr.)	31,719	$ 1,585.95
8. Pipeline Lecet (.10 per hr.)	31,719	$ 3,171.90
9. Working Dues**		$ 31,719.00
10. Union/Book Fees**		
11. Report Total		$ 588,387.45
12. Check Amount for ALL Reports		$ 615,767.73

* All employers MUST complete this entry. $ -
** Please attach all supporting payroll documentation.

13. This report prepared by:

Brandi L. Stannert
Signature

Date: 6/15/2018

(419) 874-3548
Phone

Brandi L., Stannert
Printed Name

E-mail: payroll@welded.com

Fax

Welded Construction, L.P.
P.O. Box 470
Perrysburg, Ohio 43552

PERIOD ENDING: 29-Apr-18
PHONE: 419-874-3548

May 2018

JOB: Columbia Gas - Leach Express
Marshall County, WV

JOB NO.: 2018-01

LABORERS-EMPLOYERS BENEFIT PLAN COLLECTION TRUST
P.O. BOX 630771
BALTIMORE, MARYLAND 21263-0771

Union Local	Name	S.S. No.	Hours	Gross Wages	Union Dues	PAC $0.05
	HOURLY EMPLOYEES:					
[redacted]						
LB 1149	Anderson, Zachary A.	[redacted]	39.00	1,161.90	$ 62.08	$ 1.95
[redacted]						

Union Local	Name	S.S. No.	Hours	Gross Wages	Union Dues	PAC $0.05
[redacted]						

Union Local	Name	S.S. No.	Hours	Gross Wages	Union Dues	PAC $0.05
[redacted]					$ -	$ -
	Total Hourly:		28,603.00	$ 918,512.41	$ 48,181.70	$ 1,430.15
SALARIED EMPLOYEES:						
[redacted]					$ -	$ -
					$ -	$ -
	Total Salaried:		3,116.00	$ 202,130.87	$ 9,331.63	$ 155.80
	TOTALS:		**31,719.00**	**$ 1,120,643.28**	**$ 57,513.33**	**$ 1,585.95**

	Total Hours		Rate		Total	
A - Health & Welfare	31,719	x	8.25	= $	261,681.75	
B - Annuity	31,719	x	2.50	= $	79,297.50	
C - Pension	31,719	x	5.50	= $	174,454.50	
F - Local LECET	31,719	x	0.15	= $	4,757.85	
G - Training	31,719	x	1.00	= $	31,719.00	
LEBPCT	31,719	x	0.05	= $	1,585.95	
Pipeline LECET	31,719	x	0.10	= $	3,171.90	
LPL** (PAC)	31,719	x	0.05	= $	1,585.95	
Working Dues*	31,719	x	4% & .40	= $	57,513.33	Dues & Org. Due
					$ 615,767.73	

BLANKROME
1201 N. Market Street, Suite 800
Wilmington, DE 19801

EXHIBIT C

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)

AFFIDAVIT OF SERVICE

I, Jennifer Westwood, depose and say that I am employed by Kurtzman Carson Consultants LLC (KCC), the claims and noticing agent for the Debtors in the above-captioned case.

On January 15, 2019, at my direction and under my supervision, employees of KCC caused to be served the following documents via Electronic Mail upon the service list attached hereto as **Exhibit A**; and via First Class Mail upon the service lists attached hereto as **Exhibit B** and **Exhibit C**:

- **Notice of Deadline for Filing of Proofs of Claim** [Docket No. 407]
- **Official Form 410 Proof of Claim**

Furthermore, on January 15, 2019, at my direction and under my supervision, employees of KCC caused to be served the following documents via First Class Mail upon the service list attached hereto as **Exhibit D**:

- **Notice of Deadline for Filing of Proofs of Claim** [Docket No. 407]
- ***Customized* Official Form 410 Proof of Claim**

Furthermore, on January 16, 2019, at my direction and under my supervision, employees of KCC caused to be served the following documents via First Class Mail upon the service list attached hereto as **Exhibit E**:

- **Notice of Deadline for Filing of Proofs of Claim** [Docket No. 407]
- **Official Form 410 Proof of Claim**

[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.

Furthermore, on January 16, 2019, at my direction and under my supervision, employees of KCC caused to be served the following documents via First Class Mail upon the service list attached hereto as **Exhibit F**:

- **Notice of Deadline for Filing of Proofs of Claim** [Docket No. 407]
- ***Customized* Form 410 Proof of Claim**

Dated: January 18, 2019

Jennifer Westwood
Jennifer Westwood

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California, County of San Diego

Subscribed and sworn to (or affirmed) before me on this 18th day of January, 2019, by Jennifer Westwood, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Signature:

B. S. PACLIVAR
Commission No. 2205019
NOTARY PUBLIC - CALIFORNIA
SAN DIEGO COUNTY
Commission Expires July 12, 2021

Exhibit D
Creditor Matrix
Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country
Andersen, Brad P		3802 Mystic Circle			Montbomery	TX	77356	
Anderson Equipment Company		1000 Washington Pike			BRIDGEVILLE	PA	15017	
Anderson, Andrew K		1115 James St			New Martinsville	WV	26155	
Anderson, Brian C		1429 Dudley Hill Rd			Middlebourne	WV	26149	
Anderson, Brinson W		2665 FM 2068			Klondike	TX	75448	
Anderson, Bryan L		228 Deadfall Rd			Smithfield	WV	26437	
Anderson, Christopher L		127 Grace Ave			Barnesville	OH	43713	
Anderson, Donald L		281 Reader Run Road			Reader	WV	26167	
Anderson, Douglas R		37508 170th Ave			Middle River	MN	56737	
Anderson, Greg A		568 Lenard Loop Rd			West Monroe	LA	71292	
Anderson, Hobert W		78 High St			Cameron	WV	26033	
Anderson, Howard		4905 Dry Ridge Rd			Cameron	WV	26033	
Anderson, James B		1136 SCR 45			MOUNT OLIVE	MS	39119	
Anderson, James M		33191 HWY 18			BAY SPRINGS	MS	39422	
Anderson, James S		148 Border Lane			Reader	WV	26167	
Anderson, Jason		310 Park Avenue			Middlebourne	WV	26149	
Anderson, Jerome B		520 Rosa Street			Rayville	LA	71269	
Anderson, Kyle A		104 Waller Street			Larksville	PA	18704	
Anderson, Larry D		111 HICKORY HEIGHTS DR			HENDERSONVILLE	TN	37075	
Anderson, Lawrence E		1793 Burch Ridge Rd			Proctor	WV	26055	
Anderson, Lucas C		19596 Liv 320			Hale	MO	64643	
Anderson, Mark V		P. O. Box 321			Hepzibah	WV	26369	
Anderson, Reba D		1429 Dudley Hill Rd			Middlebourne	WV	26149	
Anderson, Robert		31 Crawford Ave			Cameron	WV	26033	
Anderson, Robert L		1009 CR 966			Alpena	AR	72611	
Anderson, Roger		177 Hickory Hills Dr.			Elkview	WV	25071	
Anderson, Sheila J		214 S. Park Street			Red Lion	PA	17356	
Anderson, Terrance T		20217 Moross			Detroit	MI	48224	
Anderson, Terry K		6995 Old River Road			Philo	OH	43771	
Anderson, Todd K		P. O. Box 63			Emily	MN	56447	
Anderson, Tommy D		12048 W Shady Grove Road			Hulbert	OK	74441	
Anderson, Travis E		10239 185th Avenue SW #48			Rochester	WA	98579	
Anderson, Zachary A		5884 Waynesburg Pike Rd			Moundsville	WV	26041	
Anderson-Allman, Kristin B		110 Baker Ave			Moundsville	WV	26041	
Andino, Nelson E		927 hunter st			york	SC	29745	
Andres, Troy K		107 Mont Road			Butler	PA	16001	
Andrews, Donique		1542 Thomas St			Marion	LA	71260	
Andrews, Kevin S		PO Box 108			W Middletown	PA	15379	
Andrews, Mark L		815 Huddle Rd			Napoleon	OH	43545	
Angela M. Gordon		44986 Six Points Rd			Woodsfield	OH	43793	
Angeletti, Eugene		64 Christy Rd			Washington	PA	15301	
Angelos, Jacob N		3235 W Bloomfield Rd			Mt. Plesant	MI	48858	

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BLANKROME
1201 N. Market Street, Suite 800
Wilmington, DE 19801

EXHIBIT D

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)** **Response Deadline: 8/6/2026 at 4:00 p.m. (ET)**

NOTICE OF POST-EFFECTIVE DATE DEBTORS' OBJECTION TO CLAIM NO. 844 PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3007

THE PARTY RECEIVING THIS NOTICE SHOULD LOCATE ITS NAME AND DISPUTED CLAIM IDENTIFIED ON EXHIBIT A TO THE PROPOSED ORDER

TO: (I) THE OFFICE OF THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE; (II) ALL PARTIES WHO, AS OF THE FILING OF THE OBJECTION, HAVE FILED A NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS PURSUANT TO BANKRUPTCY RULE 2002; AND (III) CLAIMANT WHOSE DISPUTED CLAIM IS SUBJECT TO THE OBJECTION

PLEASE TAKE NOTICE that 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' Objection to Claim No. 844 Pursuant to Section 502 of the Bankruptcy Code and Bankruptcy Rule 3007* (the "Objection").[2]

PLEASE TAKE FURTHER NOTICE that any responses (each, a "Response") to the relief requested in the Objection must be filed on or before **August 6, 2026 at 4:00 p.m. (ET)** (the "Response Deadline") with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, any party submitting a Response (each, a "Respondent") must serve a copy of its Response upon the undersigned counsel to the Post-Effective Date Debtors so as to be received on or before the Response Deadline.

[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 used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

PLEASE TAKE FURTHER NOTICE that any Response must contain, at a minimum, the following:

a. a caption setting forth the name of the Court, the above-referenced case number and the title of the Objection to which the Response is directed;

b. the name of the Respondent and a description of the basis for the amount and classification asserted in the Disputed Claim, if applicable;

c. a concise statement setting forth the reasons why the particular Disputed Claim should not be disallowed, reclassified or otherwise modified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the Respondent will rely in opposing the Objection at any hearing thereon;

d. all documentation or other evidence of the particular Disputed Claim or asserted amount and classification thereof, to the extent not already included with the proof of claim previously filed, upon which the Respondent will rely in opposing the Objection at any hearing thereon; and

e. the name, address, telephone number and email address of the person(s) (who may be the Respondent or a legal representative thereof) (i) possessing ultimate authority to reconcile, settle or otherwise resolve the Disputed Claim on behalf of the Respondent and (ii) to whom the Post-Effective Date Debtors should serve any reply to the Response.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE OBJECTION (THE "HEARING") WILL BE HELD ON **AUGUST 17, 2026 AT 11:00 A.M. (ET)** BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU ARE A CLAIMANT AND FAIL TO TIMELY FILE AND SERVE A RESPONSE IN ACCORDANCE WITH THE ABOVE REQUIREMENTS, YOU WILL BE DEEMED TO HAVE CONCURRED WITH AND CONSENTED TO THE OBJECTION AND THE RELIEF REQUESTED THEREIN, AND THE POST-EFFECTIVE DATE DEBTORS WILL PRESENT TO THE COURT, WITHOUT FURTHER NOTICE TO YOU, THE PROPOSED ORDER SUSTAINING THE OBJECTION.

PLEASE TAKE FURTHER NOTICE THAT QUESTIONS CONCERNING THE OBJECTION SHOULD BE DIRECTED TO THE UNDERSIGNED COUNSEL FOR THE POST-EFFECTIVE DATE DEBTORS. CLAIMANTS SHOULD NOT CONTACT THE CLERK OF THE COURT TO DISCUSS THE MERITS OF THEIR DISPUTED CLAIM OR THE OBJECTION.

Dated: June 16, 2026
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 B

From: Williams, Jordan L.
Sent: Monday, September 14, 2026 2:27 PM
To: Bigdaddyzac2@gmail.com
Cc: Mintz, Josef
Subject: RE: Welded Construction - 18-12378
Attachments: Welded - Response Letter to Z.A..pdf

Good Afternoon Mr. Anderson:
Kindly following up on our below email and letter correspondence in connection with your claim, which you filed against Welded Construction. A copy of the letter is attached here for your reference. Please note that a hearing to consider our objection to your claim was rescheduled to **September 30, 2026 at 2:00 p.m.** before the Bankruptcy Court, Honorable Laurie Selber Silverstein, in Wilmington, Delaware.

Should you have any questions or concerns about our letter, your claim in the case, or the upcoming hearing, please contact me at either number below.

Best,
Jordan

Jordan L. Williams | BLANKROME
1201 N. Market Street | Suite 800 | Wilmington, DE 19801
direct: +1.302.425.6417 | mobile: +1.215.499.1038
jordan.williams@blankrome.com | bio

From: Williams, Jordan L.
Sent: Friday, August 7, 2026 2:56 PM
To: 'Bigdaddyzac2@gmail.com' <Bigdaddyzac2@gmail.com>
Cc: Mintz, Josef <josef.mintz@blankrome.com>
Subject: RE: Welded Construction - 18-12378

Mr. Anderson:
Please find the attached correspondence in connection with your claim in the Welded Construction bankruptcy case.

Please contact me if you have any questions.

Best,
Jordan

Jordan L. Williams | BLANKROME
1201 N. Market Street | Suite 800 | Wilmington, DE 19801
direct: +1.302.425.6417 | mobile: +1.215.499.1038
jordan.williams@blankrome.com | bio

From: Williams, Jordan L.
Sent: Friday, May 29, 2026 6:10 AM
To: 'Bigdaddyzac2@gmail.com' <Bigdaddyzac2@gmail.com>
Cc: Mintz, Josef <josef.mintz@blankrome.com>
Subject: RE: Welded Construction - 18-12378

Good Morning Mr. Anderson:
Following up on my below email in connection with your claim in the Welded Construction bankruptcy case. Please advise and please let us know if you have any questions.

Best,
Jordan

Jordan L. Williams | BLANKROME
1201 N. Market Street | Suite 800 | Wilmington, DE 19801
direct: +1.302.425.6417 | mobile: +1.215.499.1038
jordan.williams@blankrome.com | bio

From: Williams, Jordan L.
Sent: Friday, May 22, 2026 11:39 AM
To: 'Bigdaddyzac2@gmail.com' <Bigdaddyzac2@gmail.com>
Cc: Mintz, Josef <josef.mintz@blankrome.com>
Subject: Welded Construction - 18-12378

Mr. Anderson:
Blank Rome is counsel to the Welded Construction Plan Administrator. We have reviewed the proof of claim that you submitted in this chapter 11 case, a copy of which is attached for your reference.

Following our review, we have several questions regarding your claim. First, the proof of claim does not appear to include any supporting documentation. Could you please provide the basis for your claim, including any documents or records that support the amounts asserted?

Second, we note that your claim was filed in January 2023, approximately four years after the February 28, 2019 bar date established by the Court for the filing of proofs of claim. Please advise whether you have any basis for the late filing of your claim, including any argument as to why the claim should not be disallowed as untimely.

We look forward to your response and please let us know if you have any questions.

Best,
Jordan

Jordan L. Williams | BLANKROME
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direct: +1.302.425.6417 | mobile: +1.215.499.1038
jordan.williams@blankrome.com | bio