IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: WELDED CONSTRUCTION, L.P., *et al.*,[1] Debtors.	Chapter 11 Case No. 18-12378 (KG) (Jointly Administered)
WELDED CONSTRUCTION, L.P., Plaintiff, v. THE WILLIAMS COMPANIES, INC., WILLIAMS PARTNERS OPERATING LLC, and TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC, Defendants.	Adv. Pro. No. 19-50194 (KG) **Ref. Adv. Docket Nos. 58 & 63**

CERTIFICATION OF COUNSEL REGARDING STIPULATION EXTENDING PLAINTIFF'S DEADLINE TO RESPOND TO TRANSCO COUNTERCLAIMS

The undersigned counsel to Welded Construction, L.P. (the "Plaintiff") hereby certifies as follows:

1. On May 3, 2019, the Plaintiff commenced the above-captioned adversary proceeding (the "Adversary Proceeding") by filing its *Complaint and Objection to Claims* [Adv. Docket No. 1] (the "Complaint") against The Williams Companies, Inc., Williams Partners Operating LLC, and Transcontinental Gas Pipeline Company, LLC (collectively, the "Defendants" and, with Plaintiff, the "Parties").

[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.

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2. On July 3, 2019, the Defendants filed a motion (the "Motion") to abstain, transfer venue, or dismiss certain counts of the Complaint.

3. On October 16, 2019, the Court entered an order [Adv. Docket No. 49] denying in part, granting in part, the Defendants' Motion.

4. Pursuant to a Court-approved stipulation [Adv. Docket No. 58], the deadline for the Defendants to answer the Complaint was extended through and including November 13, 2019.

5. On November 13, 2019, defendant Transcontinental Gas Pipe Line Company, LLC ("Transco") filed its answer and counterclaims against Plaintiff [Adv. Docket No. 63] (collectively, the "Transco Counterclaims").

6. The Parties have conferred and entered into a stipulation (the "Stipulation"), pursuant to which they have agreed, subject to the Court's approval, that the deadline for Plaintiff to respond to the Transco Counterclaims shall be extended from December 4, 2019 to and including December 18, 2019. The Stipulation is **Exhibit 1** to the proposed order attached hereto as **Exhibit A** (the "Proposed Order").

7. Plaintiff submits that the Proposed Order is appropriate and consistent with the Parties' discussions, and Transco consented to the entry of the Proposed Order.

[Remainder of page intentionally left blank]

Dated: November 20, 2019
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Michael S. Neiburg

Sean M. Beach (No. 4070)
Kevin A. Guerke (No. 4096)
Michael S. Neiburg (No. 5275)
Travis G. Buchanan (No. 5595)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1256

-and-

LEWIS BRISBOIS BISGARD & SMITH, LLP
Kenneth D. O'Reilly
77 Water Street
21st Floor
New York, NY 10005
Telephone: (646) 783-1717
Facsimile: (212) 232-1399

Counsel for Plaintiff Welded Construction, L.P.

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: WELDED CONSTRUCTION, L.P., *et al.*,[1] Debtors.	Chapter 11 Case No. 18-12378 (KG) (Jointly Administered)
WELDED CONSTRUCTION, L.P., Plaintiff, v. THE WILLIAMS COMPANIES, INC., WILLIAMS PARTNERS OPERATING LLC, and TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC, Defendants.	Adv. Pro. No. 19-50194 (KG) **Ref. Adv. Docket Nos. 58, 63, & ___**

ORDER APPROVING STIPULATION EXTENDING
PLAINTIFF'S DEADLINE TO RESPOND TO TRANSCO COUNTERCLAIMS

Upon consideration of the Certification of Counsel;[2] and upon review of such certification and the Parties' *Stipulation Extending Plaintiff's Deadline to Respond to Transco Counterclaims* attached hereto as **Exhibit 1** (the "Stipulation"); and good and sufficient cause appearing therefor; it is hereby

ORDERED that the Stipulation is APPROVED; and it is further

[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.

[2] Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Certification of Counsel.

ORDERED that the deadline for Plaintiff to file and serve its response to the Transco Counterclaims is extended from December 4, 2019 to and including December 18, 2019.

EXHIBIT 1

Stipulation

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: WELDED CONSTRUCTION, L.P., *et al.*,[1] Debtors.	Chapter 11 Case No. 18-12378 (KG) (Jointly Administered)
WELDED CONSTRUCTION, L.P., Plaintiff, v. THE WILLIAMS COMPANIES, INC., WILLIAMS PARTNERS OPERATING LLC, and TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC, Defendants.	Adv. Pro. No. 19-50194 (KG)

STIPULATION EXTENDING PLAINTIFF'S DEADLINE
TO RESPOND TO TRANSCO COUNTERCLAIMS

The Williams Companies, Inc., Williams Partners Operating LLC, and Transcontinental Gas Pipeline Company, LLC (collectively, the "Defendants") and Welded Construction, L.P. (the "Plaintiff" and, together with the Defendants, the "Parties") hereby stipulate to the following:

WHEREAS, on May 3, 2019, Plaintiff commenced the above-captioned adversary proceeding (the "Adversary Proceeding") by filing its *Complaint and Objection to Claims* [Adv. Docket No. 1] (the "Complaint") against the defendants;

WHEREAS, on July 3, 2019, the Defendants filed a motion (the "Motion") to abstain, transfer venue, or dismiss certain counts of the Complaint;

[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.

WHEREAS, on October 16, 2019, the Court entered an Order [Adv. Docket No. 49] denying in part, granting in part, the Defendants' Motion;

WHEREAS, pursuant to a Court-approved stipulation [Adv. Docket No. 58], the deadline for the Defendants to answer or otherwise respond to the Complaint was extended through and including November 13, 2019;

WHEREAS, on November 13, 2019, defendant Transcontinental Gas Pipe Line Company, LLC filed its answer and therein asserted three counterclaims [Adv. Docket No. 63] (collectively, the "Transco Counterclaims") against Plaintiff; and

WHEREAS, the Parties have conferred with respect to an extension of the deadline for Plaintiff to respond to the Transco Counterclaims.

NOW THEREFORE, SUBJECT TO THE COURT'S APPROVAL, IT IS HEREBY STIPULATED AND AGREED as follows:

1. The deadline for the Plaintiff to file and serve its response to the Transco Counterclaims is extended from December 4, 2019 to and including December 18, 2019.

[Remainder of page intentionally left blank]

SAUL EWING ARNSTEIN & LEHR LLP

By: */s/ Lucian B. Murley*
Lucian B. Murley (DE Bar No. 4892)
1201 N. Market Street, Suite 2300
P.O. Box 1266
Wilmington, DE 19899
Telephone: (302) 421-6898
Fax: (302) 421-5864
luke.murley@saul.com

-and-

HALL ESTILL
Steven Soulé, Esquire
John F. Heil, III, Esquire
320 South Boston Avenue, Suite 200
Tulsa, OK 74103-3706
Telephone: (918) 594-0466 / 0480
Fax: (918) 594-0505
ssoule@hallestill.com
jheil@hallestill.com

Counsel for Defendants The Williams Companies, Inc., Williams Partners Operating LLC, and Transcontinental Gas Pipe Line Company, LLC

Dated: November 20, 2019

YOUNG CONAWAY STARGATT & TAYLOR, LLP

By: */s/ Michael S. Neiburg*
Sean M. Beach (No. 4070)
Kevin A. Guerke (No. 4096)
Michael S. Neiburg (No. 5275)
Travis G. Buchanan (No. 5595)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1256

-and-

LEWIS BRISBOIS BISGARD & SMITH, LLP
Kenneth D. O'Reilly
77 Water Street
21st Floor
New York, NY 10005
Telephone: (646) 783-1717
Facsimile: (212) 232-1399

Counsel for Plaintiff Welded Construction, L.P.

Dated: November 20, 2019