Docket #0032 Date Filed: 6/22/2020

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 (CSS) (Jointly Administered)
EARTH PIPELINE SERVICES, INC., Plaintiff, v. COLUMBIA GAS TRANSMISSION, LLC, Defendant.	Adv. Pro. No. 19-50274 (CSS) Adv. Pro. No. 19-50275 (CSS) (Consolidated)
COLUMBIA GAS TRANSMISSION, LLC, Counter-Claimant, v. EARTH PIPELINE SERVICES, INC., Counter-Defendant.	

REQUEST FOR ORAL ARGUMENT REGARDING
INTERVENOR MERSINO DEWATERING'S MOTION TO INTERVENE

Pursuant to Del. Bankr. L.R. 7007-3, defendant and counter-claimant Columbia Gas Transmission, LLC ("CGT") requests that the Court schedule oral argument on *Intervenor Mersino Dewatering's Motion to Intervene and Brief in Support of Motion for Intervention* [D.I. No. 22] (the "Motion to Intervene").

In support thereof, CGT states as follows:

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BACKGROUND

1. On May 8, 2019, Earth Pipeline Services, Inc. ("Plaintiff") filed a complaint against CGT in the Circuit Court of Wetzel County, West Virginia.

2. The action was subsequently removed to the United States Bankruptcy Court for the Northern District of West Virginia, followed by removal to the United States District Court for the District of Delaware, and finally, by Order dated July 15, 2019, removal to the United States Bankruptcy Court for the District of Delaware.

3. On May 14, 2020, Mersino Dewatering filed the Motion to Intervene [D. I. 22].

4. On May 28, 2020, CGT filed *Columbia Gas Transmission's Brief in Opposition to Mersino Dewatering's Motion to Intervene* [D. I. 24].

5. On May 28, 2020, Plaintiff filed *Plaintiff Earth Pipeline Services, Inc.'s Response and Opposition to Mersino Dewatering's Motion to Intervene and Brief in Support* [D. I. 26].

6. On June 2, 2020, Plaintiff, Mersino Dewatering and CGT entered into the *Stipulation Granting Mersino Dewatering an Extension of Time to File a Reply in Support of Motion to Intervene* [D. I. 27].

7. On June 15, 2020, Mersino Dewatering filed the *Reply Brief to Earth Pipeline Services and Columbia Gas Transmission LLC's Objections to Mersino Dewatering's Motion to Intervene* [D. I. 30].

8. On June 16, 2020, Mersino Dewatering filed the *Declaration of Marco Mersino in Support of Reply Brief to Earth Pipeline Services and Columbia Gas Transmission LLC's Objections to Mersino Dewatering's Motion to Intervene* [D. I. 31].

REQUEST FOR ORAL ARGUMENT

9. CGT respectfully requests that the Court schedule oral argument on the Motion to Intervene.

Date: June 22, 2020

ARCHER & GREINER, P.C.

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CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused true and correct copies of the foregoing **Request for Oral Argument Regarding Intervenor Mersino Dewatering's Motion to Intervene** to be served upon the following parties in the manner indicated below:

Dated: June 22, 2020

By: /s/ *David W. Carickhoff*
David W. Carickhoff (DE 3715)

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