Docket #0037 Date Filed: 6/29/2020

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, WELDED CONSTRUCTION, L.P., Defendants.	Adv. No. 19-50274 (CSS) Adv. No. 19-50275 (CSS) (Consolidated)
WELDED CONSTRUCTION, L.P., Plaintiff, v. EARTH PIPELINE SERVICES, INC. Defendants.	Adv. Proc. No. 20-50612 (CSS) (Consolidated)

NOTICE OF APPEARANCE AND
DEMAND FOR NOTICE AND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned hereby appears as Co-Counsel for Earth Pipeline Services, Inc., in the above-referenced Chapter 11 proceeding and associated adversary proceedings, pursuant to Bankruptcy Rules 2002 and 9010(b), and requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the undersigned attorney, or on its behalf, at the addresses set forth below:

Stephen A. Venzie, Esq. (Bar No. 5716)
Cohen, Seglias, Pallas, Greenhall & Furman, PC
500 Delaware Avenue, Suite 730
Wilmington, DE 19801



Telephone: (302) 425-5089
Email: svenzie@cohenseglias.com

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request of Service of Papers includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleadings, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand deliver, telephone, facsimile transmission, telegraph, telex, or otherwise that (1) affects or seeks to affect in any way any rights or interests of any creditor or party-in-interest in this case, including, with respect to: (a) the debtors; (b) property of the estates, or proceeds thereof, in which the debtors may claim an interest; or (c) property or proceeds thereof in the possession, custody or control of others that the debtors may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment, or other conduct.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive Earth Pipeline Services, Inc.'s (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; (iv) right to enforce any contractual provisions with respect to arbitration; or (v) other rights, claims, actions, defenses, setoffs, or recoupments to which Earth Pipeline Services, Inc. has or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: June 26, 2020

By: /s/ Stephen A. Venzie
Stephen A. Venzie

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)
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CERTIFICATE OF SERVICE

I, Sally J. Daugherty, hereby certify that on this 26th day of June 2020, I caused a true and correct copy of the ***Notice of Appearance and Demand for Notice and for Service of Papers*** to be served upon the parties identified below via email and by the Court's CM/ECF System:

David W. Carickhoff, Esq.
Alan M. Root, Esq.
Kevin F. Shaw, Esq.
Archer & Greiner P.C.
300 Delaware Avenue, Suite 1100
Wilmington, DE 19801
dcarickhoff@archerlaw.com
aroot@archerlaw.com
kshaw@archerlaw.com
Attorneys for Columbia Gas Transmission, LLC

Charles Stephen Kelley, Esq.
Andrew Elkhoury, Esq.
Mayer Brown LLP
700 Louisiana Street
Suite 3400
Houston, TX 77002
ckelley@mayerbrown.com
aelkhoury@mayerbrown.com
Attorneys for Columbia Gas Transmission, LLC

GianClaudio Finizio, Esq.
Gregory J. Flasser, Esq.
Bayard, P.A.
600 North King Street, Suite 400
Wilmington, Delaware 19801
gfinizio@bayardlaw.com
gflasser@bayardlaw.com
Attorneys for Mersino Dewatering, Inc.

Max J. Newman, Esq.
Michael Griffie, Esq.
Butzel Long PC
Stoneridge West
41000 Woodard Ave.
Bloomfield Hills, MI 48304
newman@butzel.com
griffie@butzel.com
Attorneys for Mersino Dewatering, Inc.

Sean M. Beach, Esq.
Robert F. Poppiti, Jr., Esq.
Allison S. Mielke, Esq.
Betsy L. Feldman, Esq.
Young Conaway Stargatt & Taylor, LLP
Rodney Square
1000 North King Street
Wilmington, DE 19801
sbeach@ycst.com
rpoppiti@ycst.com
amielke@ycst.com
bfeldman@ycst.com
Attorneys for Welded Construction, L.P.

COHEN, SEGLIAS, PALLAS, GREENHALL
& FURMAN, P.C.

/s/ Sally J. Daugherty
Sally J. Daugherty, Esquire (DE Bar I.D. No. 5473)
Stephen A. Venzie, Esquire (DE Bar I.D. No. 5716)
500 Delaware Avenue, Suite 730
Wilmington, DE 19801
(302) 425-5089
sdaugherty@cohenseglias.com
svenzie@cohenseglias.com

Attorneys for Earth Pipeline Service

DATED: June 26, 2020