Docket #0005 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:

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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:

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DATED: June 26, 2020

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