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 (CSS) (Jointly Administered)
EARTH PIPELINE SERVICES, INC., Plaintiff, v. COLUMBIA GAS TRANSMISSION, LLC, WELDED CONSTRUCTION, L.P., Defendants.	Adv. Pro. No. 19-50274 (CSS) Adv. Pro. No. 19-50275 (CSS) (Consolidated)
WELDED CONSTRUCTION, L.P., Plaintiff, v. EARTH PIPELINE SERVICES, INC. Defendants.	Adv. Proc. No. 20-50612 (CSS) (Consolidated)

PLAINTIFF EARTH PIPELINE SERVICES, INC.'S REQUEST FOR ORAL ARGUMENT REGARDING DEFENDANT COLUMBIA GAS TRANSMISSION'S MOTION TO DISMISS PLAINTIFF EARTH PIPELINE SERVICES, INC.'S SECOND AMENDED COMPLAINT

Pursuant Del. Bankr. L.R. 7007-3, Plaintiff, Earth Pipeline Services, Inc. ("Plaintiff" or "EPS"), by and through its undersigned counsel, hereby respectfully requests that the Court schedule oral argument on the motion of defendant Columbia Gas Transmission, LLC ("CGT")

[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 P.O. Box 470, Perrysburg, OH 43552-0470.

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to dismiss EPS's second amended complaint, and EPS' response and brief in opposition thereto [Adv. 19-50274; Docket Nos. 58 and 61].

Respectfully submitted,

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

/s/ Stephen A. Venzie
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DATED: February 23, 2021

Attorneys for Earth Pipeline Services, Inc.

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CERTIFICATE OF SERVICE

I, Stephen A. Venzie, Esq., hereby certify that on this 23rd day of February, 2021, a true and correct copy of *Plaintiff Earth Pipeline Services, Inc.'s Request for Oral Argument Regarding Defendant Columbia Gas Transmission's Motion to Dismiss Plaintiff Earth Pipeline Services, Inc.'s Second Amended Complaint* was served upon the all counsel of record via the Court's CM/ECF System.

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

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