IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
WELDED CONSTRUCTION, L.P., *et al.*,[1]	Case No. 18-12378 (LSS)
Debtors.	(Jointly Administered)
WELDED CONSTRUCTION, L.P.,	
Plaintiff,	
vs.	Adv. Pro. No. 19-50194 (LSS)
THE WILLIAMS COMPANIES, INC., WILLIAMS PARTNERS OPERATING LLC, and TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC,	**Ref. Docket Nos. 442 & 455**
Defendants.	

CERTIFICATION OF COUNSEL REGARDING PROPOSED FINAL JUDGMENT

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

1. On May 3, 2019, Welded initiated the above-captioned adversary proceeding by filing a complaint against the Williams Companies, Inc., Williams Partners Operating LLC, and Transcontinental Gas Pipe Line Company, LLC ("Transco"), alleging breach of contract among other claims and causes of action, and an objection to claims filed by Transco.

[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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2. From August 22, 2023, through September 7, 2023, the Court heard testimony and argument over the course of a 10-day bench trial to resolve the claims and counterclaims between Welded and Transco.

3. On August 20, 2024, the Court heard post-trial argument from Welded and Transco, and on February 4, 2025, the Court entered its Opinion [Adv. Docket No. 442] (the "Opinion").

4. In the Opinion, the Court instructed Welded and Transco to confer on an appropriate form of order. Welded and Transco conferred regarding the form and amount of the proposed final judgment but disagreed regarding post-judgment interest.

5. On March 3, 2025, Welded and Transco filed letter briefs with competing forms of orders, and on April 21, 2025, the Court issued its letter ruling with respect to the issue of post-judgment interest [Adv. Docket No. 455] (the "Letter Ruling").

6. In the Letter Ruling, the Court instructed Welded and Transco to confer and update the proposed form of order. Welded and Transco have conferred regarding an updated judgment order and hereby jointly submit the proposed final judgment attached hereto as **Exhibit A** (the "Proposed Judgment").

WHEREFORE, Welded respectfully requests that the Court enter the Proposed Judgment at its earliest convenience.

Dated: April 30, 2025
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Travis Buchanan

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Counsel for Welded Construction, L.P.

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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

FINAL JUDGMENT

WHEREAS, the above-captioned adversary proceeding (the "Adversary Proceeding") came on for a bench trial before this Court with respect to the claims and counterclaims between Welded Construction, L.P. ("Welded") and Transcontinental Gas Pipe Line Company, LLC ("Transco");

[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.

WHEREAS, the Court rendered its Opinion [Adv. Docket No. 442] (the "Opinion") on February 4, 2025, which constitutes the Court's findings of fact and conclusions of law pursuant to Rule 7052 of the Federal Rules of Bankruptcy Procedure; and

WHEREAS, the Court rendered a supplemental letter ruling regarding post-judgment interest and penalties [Adv. Docket No. 455] (the "Letter Ruling") on April 21, 2025;

IT IS HEREBY ORDERED, ADJUDGED, and DECREED, as stated in the Opinion and Letter Ruling, that:

1. Judgment is entered in favor of Welded and against Transco in the principal amount of $44,632,308 plus (i) pre-judgment interest and penalties, which total $57,447,123.01 as of April 30, 2025, and shall continue to accrue as set forth in the following paragraph, and (ii) attorneys' fees and expenses (collectively, the "Judgment").

2. Subject to the quantification of attorneys' fees and expenses as set forth in Paragraph 4, the Judgment in Welded's favor is $102,079,431.01 as of April 30, 2025, with pre-judgment interest and penalties continuing to accrue, pursuant to 73 Pa. Cons. Stat. §§ 501 *et seq.*, at (i) the rate of 1% simple interest on the principal amount of $39,582,308 per month (prorated for any fraction of a month); and (ii) 1% penalty on the principal amount of $39,582,308 per month (prorated for any fraction of a month) from April 13, 2019, until the entry of this Judgment.

3. Pursuant to 28 U.S.C. § 1961, Welded is awarded post-judgment interest on the Judgment until the date that the Judgment is paid in full by, or on behalf of, Transco. Pursuant to 28 U.S.C. § 1961, post-judgment interest on Welded's attorneys' fees and expenses will accrue from the date that those attorneys' fees and expenses are quantified in a separate judgment order

as set forth in Paragraph 4 of this Judgment. Post-judgment interest on the remainder of the Judgment will accrue from the date of the entry of this Judgment, pursuant to 28 U.S.C. § 1961.

4. Pursuant to 73 Pa. Cons. Stat. § 512(b), as the substantially prevailing party, Welded is awarded its attorneys' fees and expenses in this Adversary Proceeding. Welded shall make a submission regarding its attorneys' fees and expenses no later than forty-five (45) days from the date of entry of this Judgment. Transco shall have fourteen (14) days from the date Welded's submission is filed with the Court to file a response. Welded shall have seven (7) days from the date Transco's response is filed with the Court to file a reply. The Court shall enter a separate judgment order quantifying Welded's attorneys' fees and expenses.

5. All of Transco's claims and counterclaims against Welded, including Transco's (i) *Motion for Order Directing Welded Construction, L.P. to Comply with the Court's Orders Approving Commitment Letters* [Case No. 18-12378-LSS, Docket No. 836], and (ii) *Request for Adequate Protection* [Case No. 18-12378-LSS, Docket No. 837], regarding Transco's Request for Payment of Administrative Expense (assigned claim number 775) filed on April 26, 2019, as well as Transco's proofs of claim numbers 632 and 636, are hereby fully resolved and satisfied for the reasons set forth in the Opinion.

6. The Court enters this Judgment in favor of Welded and against Transco in this Adversary Proceeding for the reasons set forth in the Opinion. The Clerk of the Court is hereby directed to enter judgment on a final basis as set forth in this Judgment pursuant to Federal Rule of Civil Procedure 54(b) because there is no just reason for delay of entry of final judgment against Transco in this matter. All of Welded's existing claims against Transco and all of Transco's claims against Welded have been finally adjudicated by the Opinion, with the exception of quantification of the award of Welded's attorneys' fees and expenses, which will be

addressed by the Court as set forth in Paragraph 4 of this Judgment. The delay of entry of final judgment until the adjudication of Welded's complaint against The Williams Companies, Inc. and William Partners Operating LLC by a jury trial would prejudice the creditors of the Debtors' estate.