Docket #0474 Date Filed: 6/5/2025

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 (LSS) (Jointly Administered)
WELDED CONSTRUCTION, L.P., Plaintiff, v. THE WILLIAMS COMPANIES, INC., WILLIAMS PARTNERS OPERATING LLC, and TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC, Defendants.	Adv. Pro. No. 19-50194 (LSS)
WELDED CONSTRUCTION, L.P., Plaintiff-Appellant, v. TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC, Defendant-Appellee.	C.A. No. 25-00638 (CFC)

[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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WELDED CONSTRUCTION, L.P.'S DESIGNATION OF THE RECORD AND STATEMENT OF ISSUES ON APPEAL

Plaintiff-Appellant Welded Construction, L.P. ("Welded") hereby submits this statement of the issues to be presented on appeal and designation of the record on appeal, pursuant to Federal Rule of Bankruptcy Procedure 8009(a) and Rule 8009-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware, in connection with Welded's appeal of the Final Judgment [Adv. D.I. 457] dated May 8, 2025, in Adversary Proceeding No. 19-50194 (LSS).

I. STATEMENT OF THE ISSUES TO BE PRESENTED ON APPEAL

1. The first legal question presented by the appeal is whether the Bankruptcy Court erred in concluding that the interest provided under § 505(d) of Pennsylvania's Contractor and Subcontractor Payment Act ("CASPA"), 73 Pa. Cons. Stat. §§ 501–17, ceased to accrue once the Bankruptcy Court entered judgment, pursuant to 28 U.S.C. § 1961.

2. The second legal question presented by the appeal is whether the Bankruptcy Court erred in concluding that the penalty provided under CASPA § 512(a)(1) ceased to accrue once the Bankruptcy Court entered judgment.

II. DESIGNATION OF THE RECORD ON APPEAL[1]

Welded hereby designates the following items for inclusion in the record on appeal.

Docket No. in Adv. Pro. No. 19-50194 (LSS)	Filing Date	Description
442	2/4/25	Opinion
448	3/3/25	Letter brief for Transcontinental Gas Pipe Line Company, LLC
449	3/3/25	Letter brief for Welded Construction, L.P.
455	4/21/25	Letter ruling
457	5/8/25	Final Judgment

[Signature page follows]

[1] Welded has filed a motion to consolidate this appeal with the appeal filed by the Defendant-Appellee. *See* C.A. No. 25-00638 (CFC), D.I. 4; C.A. No. 25-00199 (CFC), D.I. 57. Welded reserves the right to include one or more items that have been designated in the Defendant-Appellee's appeal as and where appropriate if the motion to consolidate is not granted.

Dated: June 5, 2025
Wilmington,
Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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