Docket #0484 Date Filed: 7/21/2025

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,	
v.	Adv. Pro. No. 19-50194 (LSS)
THE WILLIAMS COMPANIES, INC., WILLIAMS PARTNERS OPERATING LLC, and TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC,	
Defendants.	**Related to Docket No. 483**

DEFENDANT TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC'S MOTION TO EXCEED PAGE LIMITATIONS IN CONNECTION WITH ITS OBJECTION TO WELDED CONSTRUCTION L.P.'S APPLICATION FOR ATTORNEYS' FEES AND EXPENSES

Defendant Transcontinental Gas Pipe Line Company, LLC ("Transco") hereby respectfully moves (the "Motion") this Court for an order authorizing Transco to exceed the page limitations imposed by Rule 7007-2(a)(iv) of the Local Rules for the United States Bankruptcy Court for the District of Delaware (the "Local Rules") in connection with *Transcontinental Gas Pipe Line Company, LLC's Objection to Welded Construction, LP's Application for Attorneys' Fees and Expenses* [D.I. 483] (the "Objection"), filed contemporaneously herewith. In support of this Motion, Transco respectfully states as follows:

[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, Perrysburg, OH 43552-0470.

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BACKGROUND

1. On May 8, 2025, the Court entered its *Final Judgment* [D.I. 457] (the "Final Judgment").

2. On June 23, 2025, Welded Construction, L.P. ("Welded") filed *Welded's Application for Attorneys' Fees and Expenses* [D.I. 479] (the "Application") and the *Declaration of Michael S. Neiburg in Support of Welded's Application for Attorneys' Fees and Expenses* [D.I. 480] (the "Declaration").

3. As to the length of briefs, the Local Rules provide, "Without leave of Court, no opening or answering brief shall exceed thirty (30) pages and no reply shall exceed fifteen (15) pages, in each instance, exclusive of any tables of contents and citations." *See* Del. Bankr. L.R. 7007-2(a)(iv).

RELIEF REQUESTED

4. By this Motion, Transco requests authority to exceed the page limit imposed by Local Rule 7007-2 for Transco's Objection, such that the Objection is permitted to be 63 pages long.

BASIS FOR RELIEF REQUESTED

5. Transco submits that exceeding the thirty-page limit with its Objection is necessary for Transco to fully address the issues raised in Welded's Application and the Declaration, which, combined, are nearly 2,000 pages long.

6. Although Transco has made the Objection as succinct as possible under the circumstances, Transco could not provide the Court with all the information, analysis, and argument necessary for the full and fair adjudication of the matters presented in the Application within the Local Rules' thirty-page limit. Transco submits that the extension of the page limit will

not prejudice Welded, and will allow the Court to more fully understand and adjudicate the issues presented.

WHEREFORE, Transco respectfully requests entry of the order attached as **Exhibit A**, allowing Transco to exceed the page limitations for its Objection.

Dated: July 21, 2025

SAUL EWING LLP

By: */s/ Lucian B. Murley*

Lucian B. Murley (DE Bar No. 4892)
1201 N. Market Street, Suite 2300
P.O. Box 1266
Wilmington, DE 19899
Telephone: (302) 421-6898
luke.murley@saul.com

DAVIS POLK & WARDWELL LLP
Andrew Ditchfield, Esq. (Admitted *Pro Hac Vice*)
Marc J. Tobak, Esq. (Admitted *Pro Hac Vice*)
450 Lexington Ave.
New York, NY 10017
Telephone: (212) 450-4000
andrew.ditchfield@davispolk.com
marc.tobak@davispolk.com

WATT TIEDER HOFFAR & FITZGERALD, LLP
Shelly L. Ewald, Esq. (Admitted *Pro Hac Vice*)
Jonathan C. Burwood, Esq. (Admitted *Pro Hac Vice*)
Jennifer L. Kneeland, Esq. (Admitted *Pro Hac Vice*)
1765 Greensboro Station Place, Suite 1000
McLean, Virginia 22101
Telephone: (703) 749-1000
Fax: (703) 893-8029
sewald@watttieder.com
jburwood@watttieder.com
jkneeland@watttieder.com

Counsel for Defendants The Williams Companies, Inc., Williams Partners Operating LLC, and Transcontinental Gas Pipe Line Company, LLC

EXHIBIT A

Proposed Order

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,	
v.	Adv. Pro. No. 19-50194 (LSS)
THE WILLIAMS COMPANIES, INC., WILLIAMS PARTNERS OPERATING LLC, and TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC,	
Defendants.	**Related to Docket Nos. 483 and __**

ORDER GRANTING DEFENDANT TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC'S MOTION TO EXCEED PAGE LIMITATIONS IN CONNECTION WITH ITS OBJECTION TO WELDED CONSTRUCTION L.P.'S APPLICATION FOR ATTORNEYS' FEES AND EXPENSES

Upon consideration of the motion (the "Motion")[2] filed by Transco for authority to exceed the page limitations of the Local Rules in connection with Transco's Objection; and no previous motion for such relief having been made; and upon consideration of the Motion and any response thereto; it is

HEREBY ORDERED THAT:

1. The Motion is GRANTED.

[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, Perrysburg, OH 43552-0470.

[2] All capitalized terms not defined herein shall have the same meaning as that ascribed to them in the Motion.

2. In filing the Objection, Transco is hereby granted leave to exceed the page limitations imposed by Local Rule 7007-2(a)(iv) such that the Objection is permitted to be 63 pages long.

3. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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

CERTIFICATE OF SERVICE

I, Lucian B. Murley, hereby certify that on July 21, 2025, a copy of the foregoing *Defendant Transcontinental Gas Pipe Line Company, LLC's Motion to Exceed Page Limitations in Connection with its Objection to Welded Construction L.P.'s Application for Attorneys' Fees and Expenses* was served through the Court's CM/ECF system upon all registered electronic filers appearing in this adversary proceeding and via Electronic Mail on the parties on the attached service list.

SAUL EWING LLP

By: */s/ Lucian B. Murley*
Lucian B. Murley (DE Bar No. 4892)
1201 N. Market Street, Suite 2300
P.O. Box 1266
Wilmington, DE 19899
(302) 421-6898

Dated: July 21, 2025

SERVICE LIST

Sean M. Beach, Esquire
Kevin A. Guerke, Esquire
Michael S. Neiburg, Esquire
Travis G. Buchanan, Esquire
Young Conaway Stargatt & Taylor LLP
Rodney Square, 1000 North King Street
Wilmington, DE 19801
sbeach@ycst.com
kguerke@ycst.com
mneiburg@ycst.com
tbuchanan@ycst.com