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. Adv. D.I. 479 & 488**
Defendants.	

WELDED'S MOTION TO EXCEED PAGE LIMITATIONS IN CONNECTION WITH ITS REPLY IN SUPPORT OF ITS APPLICATION FOR ATTORNEYS' FEES AND EXPENSES

Plaintiff Welded Construction, L.P. ("Welded") hereby respectfully moves (the "Motion") this Court for an order authorizing Welded 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 Welded's *Reply in Support of Welded's Application for Attorneys' Fees and Expenses* [Adv. D.I. 488] (the "Reply"), filed contemporaneously herewith. In support of this Motion, Welded 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 470, Perrysburg, OH 43552-0470.

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PERTINENT BACKGROUND

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

2. On June 23, 2025, in accordance with the Final Judgment, Welded filed *Welded's Application for Attorneys' Fees and Expenses* [Adv. D.I. 479] (the "Application").

3. On July 21, 2025, Transcontinental Gas Pipe Line Company, LLC ("Transco") filed *Transcontinental Gas Pipe Line Company, LLC's Objection to Welded Construction, LP's Application for Attorneys' Fees and Expenses* [Adv. D.I. 483] (the "Objection").

4. The Objection is sixty-three (63) pages in length, which is more than double the default thirty (30) pages for answering briefs provided by Del. Bankr. L.R. 7007-2(a)(iv). Accordingly, in connection with the Objection, Transco also filed *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* [Adv. D.I. 484] (the "Motion to Exceed Page Limits").

5. Welded did not oppose the Motion to Exceed Page Limits and on August 5, 2025, Transco filed a Certificate of No Objection to the motion [Adv. D.I. 487].

6. Concurrently with this Motion, Welded filed its Reply. Local Rule 7007-2(a)(iv) provides, in pertinent part, that reply briefs shall not exceed 15 pages without leave of Court.

RELIEF REQUESTED

7. By this Motion, Welded requests authority to exceed the page limit imposed by Local Rule 7007-2 for Welded's Reply, such that the Reply is permitted to be thirty-seven (37) pages long.

BASIS FOR RELIEF REQUESTED

8. Welded submits that exceeding the 15-page default limit with its Reply is necessary for Welded to fully address the numerous issues raised in Transco's 63-page Objection and exhibits thereto, which, combined, are roughly 500 pages long.

9. Given the length of Transco's 63-page Objection and its exhibits, which include a declaration with 30 appendices and a report submitted by a previously uninvolved consultant, Welded's Reply could not provide the Court with all of the information, analysis, and argument necessary to fully address all of the matters presented in the Objection within the Local Rules' fifteen-page limit. Welded has made the Reply as concise and targeted as possible. Granting the requested extension of the page limit will not prejudice Transco and will provide the Court with the information and authorities necessary to fairly adjudicate the Application.

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

Dated: August 11, 2025
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Travis G. Buchanan

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Counsel for Welded Construction, L.P.

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,	)	
vs.	)	Adv. Pro. No. 19-50194 (LSS)
THE WILLIAMS COMPANIES, INC., WILLIAMS PARTNERS OPERATING LLC, and TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC,	)	**Ref. Adv. D.I. 479 & 488**
Defendants.	)	

ORDER GRANTING WELDED'S MOTION TO EXCEED PAGE LIMITATIONS IN CONNECTION WITH ITS REPLY IN SUPPORT OF ITS APPLICATION FOR ATTORNEYS' FEES AND EXPENSES

Upon consideration of the motion (the "Motion")[2] filed by Welded for authority to exceed the page limitations of the Local Rules in connection with Welded's Reply; 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 470, Perrysburg, OH 43552-0470.

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

2. In filing the Reply, Welded is hereby granted leave to exceed the page limitations imposed by Local Rule 7007-2(a)(iv) such that the Reply is permitted to be thirty-seven (37) pages long.

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