Docket #0496 Date Filed: 10/8/2025

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,	)	
vs.	)	Adv. Pro. No. 19-50194 (LSS)
THE WILLIAMS COMPANIES, INC., WILLIAMS PARTNERS OPERATING LLC, and TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC,	)	
Defendants.	)	**Re Docket Nos. 457, 469, 475, and 495**

CERTIFICATION OF COUNSEL REGARDING PROPOSED ORDER APPROVING APPEAL BOND AND STAY OF EXECUTION PENDING APPEAL

The undersigned counsel to Transcontinental Gas Pipe Line Company, LLC ("Transco") hereby certifies that:

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

2. On May 29, 2025, Transco filed the *Transcontinental Gas Pipe Line Company, LLC's Motion for Order Approving Appeal Bond and Stay of Execution Pending Appeal* [D.I. 469] (the "Motion").

3. Welded Construction, L.P. ("Welded") filed *Welded's Opposition to Transcontinental Gas Pipe Line Company, LLC's Motion for Order Approving Appeal Bond and Stay of Execution Pending Appeal* [D.I. 475] (the "Objection") on June 12, 2025.

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4. The Court held a status conference on the Motion and the Objection on August 25, 2025.

5. On October 2, 2025, the Court entered on the docket a letter to counsel detailing its conclusion on the Motion and the Objection [D.I. 495] (the "Letter").

6. Attached hereto as **Exhibit A** is a proposed order (the "Proposed Order") that the parties have agreed upon. The Proposed Order is consistent with the findings detailed in the Court's Letter.

7. The undersigned counsel respectfully requests that the Court sign the Proposed Order, sign the appeal bond attached thereto as **Exhibit 1** (the "Appeal Bond"), and enter the Proposed Order and Appeal Bond on the docket.

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Dated: October 8, 2025

SAUL EWING LLP

By: */s/ Lucian B. Murley*

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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.*,	)	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.	)	**Related to Adv. D.I. Nos. 457, 469, 475, 495, and ___**

ORDER APPROVING APPEAL BOND AND
STAY OF EXECUTION PENDING APPEAL

Upon consideration of Defendant Transcontinental Gas Pipe Line Company, LLC's ("Transco") *Certification of Counsel Regarding Proposed Order Approving Appeal Bond and Stay of Execution Pending Appeal* for order approving appeal bond and stay of execution pending appeal pursuant to Rules 7062 and 8007(a)(1) of the Federal Rules of Bankruptcy Procedure it is

HEREBY ORDERED THAT:

1. The appeal bond annexed hereto as **Exhibit 1** conditioned on the satisfaction in full of the judgment as may be modified, together with interest, as the United States District Court for the District of Delaware and other appellate court may adjudge and award is hereby approved.

2. Execution on or proceedings to enforce the Court's final judgment in favor of Welded and against Transco in the amount of $102,290,536.65 entered on or about May 8, 2025 (the "Final Judgment") is hereby stayed through the pendency of the appeal process commenced on February 18, 2025 when Transco filed its Notice of Appeal [Adv. D.I. 443] following entry of the Court's February 4, 2025 Opinion [*See* Adv. D.I. 0442] in favor of Welded and against Transco in the principal amount of $44,632,308, representing a portion of Welded's unpaid invoiced amounts for the ASR Project, plus prejudgment interest of 1% per month and penalty interest of 1% per month per CASPA from April 13, 2019.

3. The stay shall apply to prohibit Welded from further registering, docketing, recording, filing, or otherwise taking any action to effectuate a judgment lien, enforce, or execute on the Final Judgment, and any judgment associated with the Court's subsequent ruling(s) on the award of fees and expenses to Welded in the Adversary Proceeding, in any foreign jurisdiction. For the avoidance of doubt, this Order does not affect or invalidate, in any way, Welded's registration or recordation of the Final Judgment in the (i) Superior Court of Delaware in New Castle, Kent, and Sussex counties, (ii) the District Court in and for Tulsa county, Oklahoma, and (iii) the District Court of Harris county, Texas (collectively, the "Registered Jurisdictions"), nor prevent either party from exercising its rights in the Registered Jurisdictions in accordance with this Order and applicable state law.

4. The stay shall not prohibit Welded from registering or recording any judgment associated with the Court's subsequent ruling(s) on the award of fees and expenses to Welded in the Adversary Proceeding in the Registered Jurisdictions in the same manner and to the same extent as the Final Judgment was previously registered or recorded by Welded.

EXHIBIT 1

Appeal Bond

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,	)	
vs.	)	Adv. Pro. No. 19-50194 (LSS)
THE WILLIAMS COMPANIES, INC., WILLIAMS PARTNERS OPERATING LLC, and TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC,	)	
Defendants.	)	

Surety's Bond No.: 022241686

APPEAL BOND

KNOW ALL BY THESE PRESENTS, that **Liberty Mutual Insurance Company** a corporation organized and existing under and by virtue of the laws of the State of **Massachusetts**, having a mailing address of **175 Berkeley Street, Boston, MA 02116** (the "Surety Company"), duly authorized to execute a surety bond in the amount and subject to the conditions herein provided, are separately and severally held and firmly bound as sureties unto Welded Construction, L.P. ("Welded") in the above-captioned action (the "Action"), pending before the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court") in the sum of One Hundred Twenty-Two Million Seven Hundred Forty-Eight Thousand, Six Hundred Forty-Four Dollars ($122,748,644.00), to be paid to Welded and its administrators, executors, successors, attorneys or

assigns, to which payment well and truly to be made the Surety Company binds itself, its successors and assigns firmly by these presents. In no event, however, shall the Surety Company's obligation under this bond exceed the maximum aggregate sum of $122,748,644.00. Signed and sealed with the corporate seal of said Surety Company this **28th day of May, 2025.**

WHEREAS, in the Action, the Bankruptcy Court entered a Final Judgment in favor of Welded and against Defendant Transcontinental Gas Pipe Line Company, LLC ("Transco") in the amount of $102,290,536.65, from which judgment Transco intends to appeal to the United States District Court for the District of Delaware (the "District Court");

WHEREAS, the Final Judgment and this Appeal Bond does not cover the Court's award of attorneys' fees and expenses, which will be quantified in a separate judgment order.

NOW, THEREFORE, the condition on this obligation is such that if Transco shall prosecute its appeal to effect and: (i) Transco shall satisfy the judgment in full together with costs, interest, and damages if for any reason the appeal is dismissed or if the judgment is affirmed; (ii) Transco shall satisfy in full such judgment as modified and such costs, interest, and damages as the District Court, other appellate court, or Bankruptcy Court may adjudge and award; or (iii) the Final Judgment is reversed or the Action is remanded to the Bankruptcy Court for further proceedings, then this obligation shall be void; otherwise, it shall remain in full force and effect.

The Surety Company hereby submits itself to the jurisdiction of the Bankruptcy Court and irrevocably appoints **Corporation Service Company** at **251 Little Falls Drive, Wilmington, DE 19808** as its agent upon whom any notice or papers affecting its liability on this bond may be served (the "Agent"), and agrees that its liability on this bond, which liability shall not exceed the sum set forth above, may be enforced on motion without the necessity of an independent action and that such motion, with such notice thereof as the Bankruptcy Court may prescribe, may be served upon

the Agent at such address, who shall forthwith mail a copy to the Surety Company at the following address:

175 Berkeley Street, Boston, MA 02116

Liberty Mutual Insurance Company

By: **Jeffrey M. Wilson**
Attorney-in-Fact

Surety Company is hereby approved, pursuant to Federal Rule of Civil Procedure 62 as made applicable by Federal Rule of Bankruptcy Procedure 7062, as sureties on this bond, and the form and sufficiency of the bond are also hereby approved.

APPROVED BY THE COURT this _____ day of _____, 2025.

_____

ACKNOWLEDGEMENT BY SURETY

STATE OF **ALABAMA**
COUNTY OF **JEFFERSON**

On this **28th** day of **May**, 2025, before me, **Donna Jane Austin**, a Notary Public, within and for said County and State, personally appeared **Jeffrey M. Wilson** to me personally known to be the Attorney-in-Fact of and for **Liberty Mutual Insurance Company** and acknowledged that s/he executed the said instrument as the free act and deed of said **Jeffrey M. Wilson**.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed by official seal, the day and year in this certificate first above written.

Notary Public in the State of **Alabama**
County of **Jefferson**



Liberty Mutual SURETY

POWER OF ATTORNEY

Liberty Mutual Insurance Company
The Ohio Casualty Insurance Company
West American Insurance Company

Certificate No: **8213597-016032**

KNOWN ALL PERSONS BY THESE PRESENTS: That The Ohio Casualty Insurance Company is a corporation duly organized under the laws of the State of New Hampshire, that Liberty Mutual Insurance Company is a corporation duly organized under the laws of the State of Massachusetts, and West American Insurance Company is a corporation duly organized under the laws of the State of Indiana (herein collectively called the "Companies"), pursuant to and by authority herein set forth, does hereby name, constitute and appoint, Alisa B. Ferris; Anna Childress; Jeffrey M. Wilson; Mark W. Edwards, II; Richard H. Mitchell; Robert R. Freel; Samuel F. Audia, III; William M. Smith

all of the city of Birmingham state of AL each individually if there be more than one named, its true and lawful attorney-in-fact to make, execute, seal, acknowledge and deliver, for and on its behalf as surety and as its act and deed, any and all undertakings, bonds, recognizances and other surety obligations, in pursuance of these presents and shall be as binding upon the Companies as if they have been duly signed by the president and attested by the secretary of the Companies in their own proper persons.

IN WITNESS WHEREOF, this Power of Attorney has been subscribed by an authorized officer or official of the Companies and the corporate seals of the Companies have been affixed thereto this 3rd day of April, 2025.

Liberty Mutual Insurance Company
The Ohio Casualty Insurance Company
West American Insurance Company

By: _____
Nathan J. Zangerle, Assistant Secretary

State of PENNSYLVANIA
County of MONTGOMERY ss

On this 3rd day of April, 2025 before me personally appeared Nathan J. Zangerle, who acknowledged himself to be the Assistant Secretary of Liberty Mutual Insurance Company, The Ohio Casualty Company, and West American Insurance Company, and that he, as such, being authorized so to do, execute the foregoing instrument for the purposes therein contained by signing on behalf of the corporations by himself as a duly authorized officer.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed my notarial seal at Plymouth Meeting, Pennsylvania, on the day and year first above written.

Commonwealth of Pennsylvania - Notary Seal
Teresa Pastella, Notary Public
Montgomery County
My commission expires March 28, 2029
Commission number 1126044
Member, Pennsylvania Association of Notaries

By: _____
Teresa Pastella, Notary Public

This Power of Attorney is made and executed pursuant to and by authority of the following By-laws and Authorizations of The Ohio Casualty Insurance Company, Liberty Mutual Insurance Company, and West American Insurance Company which resolutions are now in full force and effect reading as follows:

ARTICLE IV – OFFICERS: Section 12. Power of Attorney.
Any officer or other official of the Corporation authorized for that purpose in writing by the Chairman or the President, and subject to such limitation as the Chairman or the President may prescribe, shall appoint such attorneys-in-fact, as may be necessary to act in behalf of the Corporation to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations. Such attorneys-in-fact, subject to the limitations set forth in their respective powers of attorney, shall have full power to bind the Corporation by their signature and execution of any such instruments and to attach thereto the seal of the Corporation. When so executed, such instruments shall be as binding as if signed by the President and attested to by the Secretary. Any power or authority granted to any representative or attorney-in-fact under the provisions of this article may be revoked at any time by the Board, the Chairman, the President or by the officer or officers granting such power or authority.

ARTICLE XIII – Execution of Contracts: Section 5. Surety Bonds and Undertakings.
Any officer of the Company authorized for that purpose in writing by the chairman or the president, and subject to such limitations as the chairman or the president may prescribe, shall appoint such attorneys-in-fact, as may be necessary to act in behalf of the Company to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations. Such attorneys-in-fact subject to the limitations set forth in their respective powers of attorney, shall have full power to bind the Company by their signature and execution of any such instruments and to attach thereto the seal of the Company. When so executed such instruments shall be as binding as if signed by the president and attested by the secretary.

Certificate of Designation – The President of the Company, acting pursuant to the Bylaws of the Company, authorizes Nathan J. Zangerle, Assistant Secretary to appoint such attorneys-in-fact as may be necessary to act on behalf of the Company to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations.

Authorization – By unanimous consent of the Company's Board of Directors, the Company consents that facsimile or mechanically reproduced signature of any assistant secretary of the Company, wherever appearing upon a certified copy of any power of attorney issued by the Company in connection with surety bonds, shall be valid and binding upon the Company with the same force and effect as though manually affixed.

I, Renee C. Llewellyn, the undersigned, Assistant Secretary, The Ohio Casualty Insurance Company, Liberty Mutual Insurance Company, and West American Insurance Company do hereby certify that the original power of attorney of which the foregoing is a full, true and correct copy of the Power of Attorney executed by said Companies, is in full force and effect and has not been revoked.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seals of said Companies this 28th day of May 2025

By: _____
Renee C. Llewellyn, Assistant Secretary

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Not valid for mortgage, note, loan, letter of credit, currency rate, interest rate or residual value guarantees.

For bond and/or Power of Attorney (POA) verification inquiries, please call 610-832-8240 or email HOSUR@libertymutual.com.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
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Debtors.	)	(Jointly Administered)
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Plaintiff,	)	
vs.	)	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 Murley, Esquire, hereby certify that on October 8, 2025, a copy of the *Certification of Counsel Regarding Proposed Order Approving Appeal Bond and Stay of Execution Pending Appeal* was served through the Court's CM/ECF system upon all registered electronic filers appearing in this case and via Electronic Mail on the parties on the attached service list.

SAUL EWING LLP

By: */s/ Lucian Murley*
Lucian Murley (DE Bar No. 4892)
1201 North Market Street, Suite 2300
P. O. Box 1266
Wilmington, DE 19801-1266
(302) 421-6898

Dated: October 8, 2025

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