

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:) Chapter 11
MOLL INDUSTRIES, INC., *et al.*,¹) Case No. 10-11371 (MFW)
) Jointly Administered
)
Debtors.) **Objection Deadline: March 2, 2011 at 4:00 p.m.**
) **Hearing Date: Only if Objections filed**

NOTICE OF APPLICATION

PLEASE TAKE NOTICE THAT on February 10, 2011, the Debtors filed the attached *Ninth Monthly Application of Sullivan Hazeltine Allinson LLC for Compensation for Services Rendered and Reimbursement of Expenses as Counsel to the Debtors for the Period from January 1, 2011 Through January 31, 2011* (the "Application") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that any objections to the Application must be made in writing, filed with the Bankruptcy Court, 824 Market Street, Wilmington, Delaware 19801 and served so as to actually be received by the undersigned counsel for the Debtors on or before **March 2, 2011 at 4:00 p.m. Prevailing Eastern Time.**

PLEASE TAKE FURTHER NOTICE that, pursuant to the Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals (D.I. 78), if no Objection is filed and served in accordance with the above procedure, the Debtors will be authorized to pay 80% of the requested fees and 100% of the requested expenses without further order of the Court.

Dated: February 10, 2011
Wilmington, Delaware

SULLIVAN • HAZELTINE • ALLINSON LLC

/s/ William A. Hazeltine

William A. Hazeltine (No. 3294)
4 East 8th Street, Suite 400
Wilmington, DE 19801
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Email: whazeltine@sha-llc.com

Attorneys for the Debtors and Debtors-in-Possession

¹ The Debtors in these cases are as follows: Moll Industries, Inc., Case No. 10-11371 (MFW); Moll Holdings, Inc., Case No. 10-11372 (MFW); Moll Europe Holdings, LLC, Case No. 10-11373 (MFW); and Moll Latin America Holdings, LLC, Case No. 10-11374 (MFW).

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**SUMMARY OF NINTH MONTHLY APPLICATION OF SULLIVAN HAZELTINE
ALLINSON LLC FOR COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS COUNSEL TO THE DEBTORS
FOR THE PERIOD FROM JANUARY 1, 2011 THROUGH JANUARY 31, 2011**

Name of Applicant: Sullivan Hazeltine Allinson LLC ("SHA-LLC")

Authorized to Provide
Professional Services to: Debtors Moll Industries, Inc., et al.

Date of Retention: April 27, 2010 (nunc pro tunc)

Period for which compensation and
reimbursement is sought: January 1, 2011 through January 31, 2011 (the "Compensation
Period")

Amount of Compensation sought
as actual, reasonable and necessary: \$12,474.00

Amount of Expense Reimbursement sought
as actual, reasonable and necessary: \$6.50

This is an: interim final application.

The total time expended for preparation of this fee application is approximately 2.20 hours and the corresponding compensation of approximately \$477.00 will be requested in a subsequent fee application.

This is SHA-LLC's ninth monthly fee application in this case.

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PRIOR APPLICATIONS

Date Filed	Period Covered	Requested Fees and Expenses	Date Approved	Approved
July 15, 2010	April 27, 2010 – May 31, 2010	\$32,602.00 (fees) \$4,188.50 (exp)	August 6, 2010 (CNO)	\$26,081.60 (fees) \$4,188.50 (exp)
July 21, 2010	June 1, 2010 – June 30, 2010	\$46,441.50 (fees) \$703.27 (exp)	August 12, 2010 (CNO)	\$37,153.32 (fees) \$703.27 (exp)
Aug. 12, 2010	July 1, 2010 – July 31, 2010	\$52,375.50 (fees) \$13,577.35 (exp)	Sept. 3, 2010 (CNO)	\$41,900.40 (fees) \$13,577.35 (exp)
Sept. 28, 2010	August 1, 2010 – August 31, 2010	\$34,467.00 (fees) \$2,419.82 (exp)	Oct. 20, 2010 (CNO)	\$27,573.60 (fees) \$2,419.82 (exp)
Oct. 4, 2010	April 27, 2010 – July 31, 2010	\$131,419.00 (fees) \$18,469.11 (exp)	Oct. 29, 2010 Order	20% Holdback
Oct. 22, 2010	September 1, 2010 – September 30, 2010	\$39,526.00 (fees) \$2,311.34 (exp)	Nov. 16, 2010 (CNO)	\$31,620.80 (fees) \$2,311.34 (exp)
Nov. 18, 2010	October 1, 2010 – October 31, 2010	\$18,499.50 (fees) \$755.55 (exp)	Dec. 13, 2010 (CNO)	\$14,799.60 (fees) \$775.55 (fees)
Dec. 14, 2010	November 1, 2010 – November 30, 2010	\$6,400.500 (fees) \$0.00 (exp)	January 6, 2011 (CNO)	\$5,120.40 (fees)
Jan. 18, 2011	December 1, 2010 – December 31, 2010	\$10,125.50 (fees) \$151.90 (exp)	Pending	Pending
Jan. 19, 2011	Aug. 1, 2010 – Dec. 31, 2010	\$109,018.50 (fees) \$5,630.61 (exp)	Pending	Pending

The SHA-LLC professionals who rendered professional services in these cases during the Compensation Period are:

Name of Professional Person	Position with the applicant	Number of years as an attorney	Department	Hourly billing rate	Total billed hours	Total Compensation
William A. Hazeltine	Member	16	Bankruptcy	\$360.00	28.90	\$10,404.00
Heidi M. Coleman	Paralegal	-	Bankruptcy	\$150.00	13.80	\$2,070.00
TOTAL					42.70	\$12,474.00

GRAND TOTAL: \$12,474.00 Fees

42.70 Hours

BLENDED RATE: \$ 292.13 Per Hour

COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours Billed	Total Compensation
Asset Disposition	7.70	\$2,772.00
Business and Financial	1.70	\$612.00
Financing and Cash Collateral	0.70	\$252.00
Lease and Contract Issues	6.70	\$2,076.00
Litigation	14.40	\$4,533.00
Omnibus Hearings	2.50	\$417.00
Professional Fees	9.00	\$1,812.00
TOTAL	42.70	\$12,474.00

This interim fee application also seeks the reimbursement of the following expenses advanced on behalf of the Debtors in this matter.

<u>Description</u>	<u>Amount</u>
Omnibus Hearings	
Courier Service	\$6.50
TOTAL	\$6.50

Dated: February 10, 2011
Wilmington, Delaware

SULLIVAN • HAZELTINE • ALLINSON LLC

/s/ William A. Hazeltine

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Attorneys for the Debtor and Debtor in Possession

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**NINTH MONTHLY APPLICATION OF SULLIVAN HAZELTINE ALLINSON LLC
FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT
OF EXPENSES AS COUNSEL TO THE DEBTORS FOR THE PERIOD
FROM JANUARY 1, 2011 THROUGH JANUARY 31, 2011**

Sullivan Hazeltine Allinson LLC (“SHA-LLC” or “Applicant”), counsel to Moll Industries, Inc. and its affiliated debtors (the “Debtors”), hereby submits its application, pursuant to 11 U.S.C. §§ 330, 331 and 503(b)(4), Rule 2016 of the Federal Rules of Bankruptcy Procedure and Del. Bankr. L.R. 2016-2, for interim allowance of compensation for services rendered and for reimbursement of expenses incurred solely for the Debtors, and in further explanation respectfully represents:

I. INTRODUCTION

1. By this application, SHA-LLC seeks, with regard to the Debtors, (i) an interim allowance and award of compensation (i) for professional services rendered by SHA-LLC, as counsel for the Debtors, for the period from January 1, 2011 through and including January 31, 2011 (the “Compensation Period”) in the amount of \$12,474.00 representing 42.70 hours in professional services; and (ii) reimbursement of actual and necessary expenses incurred by

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SHA-LLC during the Compensation Period in connection with the rendition of such professional services in the amount of \$6.50 (the “Application”).

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of this proceeding and this application is proper in this district pursuant to 28 U.S.C. §§1408 and 1409. The statutory predicates for the relief sought herein are 11 U.S.C. §§ 330, 331, 503(b)(4), Federal Rule of Bankruptcy Procedure 2016 and Del. Bankr. L.R. 2016-2.

II. BACKGROUND

3. On April 27, 2010 (the “Petition Date”), the Debtors each filed with this Court a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”). Pursuant to sections 1107 and 1108 of the Bankruptcy Code, the Debtors are continuing to operate their businesses and manage their properties as debtors-in-possession. The Office of the United States Trustee appointed the Official Committee of Unsecured Creditors on May 10, 2010.

4. Prior to the Petition Date, the Debtors retained SHA-LLC as bankruptcy counsel to represent them in these proceedings. This Court approved the retention of SHA-LLC as counsel to the Debtors *nunc pro tunc* to April 27, 2010 (the “Retention Date”) by order dated May 20, 2010 (Docket No. 81).

5. Applicant has received no payments or promises of payment from any source other than the Debtors for services rendered or to be rendered in any capacity whatsoever in these cases. There is no agreement or understanding between SHA-LLC and any other person for the sharing of compensation in connection with this case other than in accordance with the provisions of the Bankruptcy Code.

6. The services for which compensation is being sought by SHA-LLC were rendered for and on behalf of the Debtors and not for or on the behalf of any other interested party in this bankruptcy proceeding.

III. TIME RECORDS AND HOURLY RATES

7. William A. Hazeltine and Heidi Coleman of SHA-LLC provided services for the Debtors during the Compensation Period. Mr. Hazeltine was admitted to the Bar of the Supreme Court of Delaware in 1994. Mr. Hazeltine became an associate with the Wilmington, Delaware law firm of Potter Anderson & Corroon LLP on August 15, 1994 and became a partner at Potter Anderson & Corroon LLP effective January 1, 2003. Mr. Hazeltine left Potter Anderson & Corroon LLP in 2004 and began his own practice in 2005. On January 1, 2008, Mr. Hazeltine became a member of SHA-LLC. Applicant charged \$360.00 per hour for services rendered by Mr. Hazeltine during the Compensation Period.

5. Ms. Coleman is a paralegal with SHA-LLC and has 13 years of experience as a paralegal. Applicant charged \$150.00 per hour for services rendered by Ms. Coleman during the period covered by this Application.

6. The total time spent by SHA-LLC representing the Debtors during the Compensation Period was 42.70 hours and the compensation sought for the Compensation Period is \$12,474.00. This equates to a blended rate of \$292.13 per hour.

7. Attached hereto as Exhibit A and incorporated herein by reference are SHA-LLC's time records showing a daily log of all time spent by SHA-LLC providing services for the Debtors during the Compensation Period by Project Category. The attached time records provide a detailed, day-by-day explanation of the services rendered by SHA-LLC in connection

with this matter during that time. Applicant certifies that Applicant has reviewed Del. Bankr. L.R. 2016-2 and believes that the Application complies therewith.

8. Also included in Exhibit A, and incorporated herein by reference, is a summary of the expenses incurred by SHA-LLC during the Compensation Period on behalf of the Debtors. Expenses that SHA-LLC bills to its clients include charges for long distance telephone calls, photocopying, postage, courier services, Federal Express, court costs and transcript fees. The total expense for which reimbursement is sought in the Application is \$6.50. In a future fee application, SHA-LLC may seek reimbursement of additional expenses advanced or incurred on behalf of the Debtors during this Compensation Period that do not appear on Exhibit A.

IV. GENERAL DESCRIPTION OF SERVICES RENDERED

9 The services rendered by SHA-LLC that are the subject of this Application include the following:

(a) Asset Disposition. During the compensation period, SHA-LLC professionals (1) reviewed information regarding renewal and possible sale of a patent related to the attachment of bristles to tooth brushes and (2) drafted and revised proposed asset purchase agreement.

(b) Business and Financial. During the compensation period, SHA-LLC professionals attended board meetings.

(c) Financing and Cash Collateral. During the Compensation Period, SHA-LLC professionals discussed the use of cash collateral and reviewed the proposed budget.

(d) Lease and Contract Issues. During the compensation period, SHA-LLC professionals drafted and revised a motion for order approving a settlement among the Debtors, FPE and Acton.

(e) Litigation. During the compensation period, SHA-LLC professionals reviewed documents produced to TMA, discussed proposed settlement and trial issues with parties in interest and prepared for and attended a hearing regarding the TMA issue.

(f) Omnibus Hearings. During the Compensation period, SHA-LLC professionals (i) prepared agendas, hearing binders and certificates of no objection for applicable documents for all hearings, (ii) communicated with the Court and parties in interest regarding omnibus hearings, and (iii) prepared for upcoming omnibus hearings in these cases.

(g) Professional Fees. During the Compensation period, SHA-LLC professionals prepared and filed monthly and quarterly fee applications for SHA-LLC, Merritt Sadler Group, LLP, and Shumaker, Loop & Kendrick and reviewed fee applications filed by other professionals.

V. CONCLUSION

16. The compensation sought by Applicant is based on the normal hourly rates charged by Applicant for work of this character. The services rendered by Applicant to the Debtors were necessary and appropriate and to date have benefited the Debtors, their creditors, and estates. The amount of compensation sought by SHA-LLC is consistent with the factors enumerated in 11 U.S.C. §330, in that the amount sought is reasonable compensation for actual, necessary services rendered by the Applicant taking into account all relevant factors, including time spent on such services; the rates charged for such services; the complexity, importance, and nature of the problem, issue or task addressed; and the customary compensation charged by comparably skilled practitioners in cases other than cases under the Bankruptcy Code.

WHEREFORE, Applicant respectfully requests that this Court enter an order:

(a) approving the allowance of compensation for professional services that were rendered by SHA-LLC to the Debtors during the period from January 1, 2011 through and including January 31, 2011 in the amount of \$12,474.00;

(b) approving the reimbursement of SHA-LLC's expenses incurred in connection with the rendering of such services in the amount of \$6.50; and

(c) granting to SHA-LLC such other relief as this Court may deem just and proper.

Dated: February 10, 2011
Wilmington, Delaware

SULLIVAN • HAZELTINE • ALLINSON LLC

/s/ William A. Hazeltine

William A. Hazeltine (No. 3294)
4 East 8th Street, Suite 400
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Email: whazeltine@sha-llc.com

Attorneys for the Debtor and Debtor-in-Possession

Exhibit A

SULLIVAN HAZELTINE ALLINSON LLC

Attorneys and Counselors at Law

4 East 8th Street, Suite 400

Wilmington, DE 19801

Tax ID # 20-5238500

Tel: (302) 428-8191

Fax:(302) 428-8195

February 09, 2011

Invoice # 13141

Moll Industries, Inc.
c/o Jeffrey Merritt
Moll Industries, Inc.
13455 Noel Road, Suite 1310
Dallas, TX 75240

In Reference To: Moll Industries, Inc.

Professional Services

	<u>Hours</u>	<u>Amount</u>
<u>Asset Disposition</u>		
1/11/2011 WAH Discussion with counsel for Highland re: status of patent sale	0.20	72.00
1/18/2011 WAH Review preliminary offer to acquire brush patent and discussion with J. Merritt re: same	0.30	108.00
1/20/2011 WAH Begin to draft asset purchase agreement for patent	1.10	396.00
1/21/2011 WAH Draft form asset purchase agreement for sale of patent	0.80	288.00
1/25/2011 WAH Continue to draft asset purchase agreement for patent sale	1.60	576.00
1/28/2011 WAH Finalize first draft of asset purchase agreement for sale of patent	3.70	1,332.00
SUBTOTAL:	[7.70	2,772.00]
<u>Business and Financial</u>		
1/6/2011 WAH Board meeting	0.60	216.00
1/11/2011 WAH Telephonic board meeting	1.10	396.00
SUBTOTAL:	[1.70	612.00]
<u>Financing and Cash Collateral</u>		
1/18/2011 WAH Discussion with J. Daniel re: cash collateral budget	0.30	108.00
1/26/2011 WAH Review draft cash collateral budget	0.40	144.00

		<u>Hours</u>	<u>Amount</u>
SUBTOTAL:		[0.70	252.00]
<u>Lease/Contract Issues</u>			
1/6/2011	WAH Review letter re: New Braunfels lease and communications re: same	0.20	72.00
1/20/2011	WAH Draft Acton/FPE settlement agreement (2.6); review and comment on settlement motion (.9)	3.50	1,260.00
	HMC Draft settlement motion, order and notice	0.80	120.00
1/21/2011	HMC Review and revise motion for settlement among Moll, FPE and ACTON; file and coordinate service of same	0.80	120.00
	WAH Revise Acton/FPE settlement motion and prepare for filing	1.40	504.00
SUBTOTAL:		[6.70	2,076.00]
<u>Litigation</u>			
1/6/2011	HMC Review of adversary scheduling order	0.20	30.00
1/10/2011	WAH Review of documents produced to TMA	0.60	216.00
1/11/2011	WAH Prepare for TMA trial	5.70	2,052.00
	WAH Discussions with J. Merritt and M. Mullin re: TMA Trial	0.40	144.00
	HMC Prepare exhibit list and binders for hearing with TMA; meeting with WAH; westlaw research	2.70	405.00
	WAH Discussions with TMA's counsel, NexBank's counsel and J. Merritt re: settlement	0.70	252.00
1/12/2011	WAH Prepare for and attend TMA hearing	0.50	180.00
1/13/2011	WAH Draft TMA proposed order and certification of counsel	2.60	936.00
1/14/2011	WAH Review and comment on revised TMA order and communications re: same (.2); revise order (.4)	0.60	216.00
1/19/2011	WAH Review signed order re: TMA; communications re: payment	0.20	72.00
	HMC Review of TMA agreed order; coordinate service of same	0.20	30.00
SUBTOTAL:		[14.40	4,533.00]
<u>Omnibus Hearings</u>			
1/6/2011	HMC Conference call with board members (.4); file and coordinate service of certification of counsel regarding Jobson settlement motion (.3); correspondence to chambers (.2)	0.90	135.00
1/7/2011	HMC Review of docket entries in preparation for hearing (.3); draft agenda for January 12, 2011 hearing (.4); prepare hearings binders for same (.4)	1.10	165.00

	<u>Hours</u>	<u>Amount</u>
1/10/2011 WAH Review agenda for January 12 hearing	0.20	72.00
HMC Revise agenda for January 12, 2011; file and coordinate service of same	0.30	45.00
	<hr/>	<hr/>
SUBTOTAL:	[2.50	417.00]
<u>Professional Fees</u>		
1/4/2011 HMC Review and revise December billing statement (.3)	0.30	45.00
1/5/2011 HMC Draft December 2010 fee application and summary	1.30	195.00
1/6/2011 WAH Certificate of No Objection for SHA November fee application	0.20	72.00
1/13/2011 WAH Revise SHA December fee application	0.40	144.00
1/18/2011 HMC Review and revise SHA December 2010 fee application; file and coordinate service of same	0.60	90.00
HMC Begin drafting SHA second quarterly fee application; meeting with WAH	0.50	75.00
1/19/2011 HMC Continue drafting and revising second quarterly fee application, summary and notice; meeting with WAH; file and coordinate service of same	2.20	330.00
WAH Review Andrews Kurth monthly fee application	0.20	72.00
WAH Review and comment on SHA 2nd interim fee application	0.70	252.00
HMC Draft notice for AK final fee application; file and coordinate service of same; correspondence with co-counsel	0.70	105.00
1/20/2011 WAH Review and comment on Andrews Kurth interim fee application	0.20	72.00
HMC Draft and revise Andrews Kurth quarterly fee application and summary; file and coordinate service of same	0.90	135.00
1/25/2011 WAH Review fee applications of committee professionals	0.50	180.00
1/28/2011 HMC Review of Shumaker loop fee applications; meeting with WAH	0.30	45.00
	<hr/>	<hr/>
SUBTOTAL:	[9.00	1,812.00]
For professional services rendered	<hr/>	<hr/>
	42.70	\$12,474.00
Additional Charges :		
1/10/2011 Courier Service		6.50
1/11/2011 Courier Service		6.50
1/14/2011 Courier Service		6.50
		<hr/>
SUBTOTAL:		[19.50]

	<u>Amount</u>
<u>Omnibus Hearings</u>	
1/7/2011 Courier Service	6.50
 SUBTOTAL:	[6.50]
 Total additional charges	\$26.00
 Total amount of this bill	\$12,500.00
 Previous balance	\$84,683.69
 Balance due	\$97,183.69

Timekeeper Summary

Name	Hours	Rate	Amount
William A. Hazeltine	28.90	360.00	\$10,404.00
Heidi Coleman	13.80	150.00	\$2,070.00