

**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: April 11, 2011 at 4:00 p.m.**
) **Hearing Date: Only if Objections filed**

NOTICE OF APPLICATION

PLEASE TAKE NOTICE THAT on March 21, 2011, the Debtors filed the attached *Tenth 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 February 1, 2011 Through February 28, 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 **April 11, 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: March 21, 2011
Wilmington, Delaware

SULLIVAN • HAZELTINE • ALLINSON LLC

/s/ William A. Hazeltine
William A. Hazeltine (No. 3294)
901 North Market Street, Suite 1300
Wilmington, DE 19801
Tel: (302) 428-8191
Fax: (302) 428-8195
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).

**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: April 11, 2011 at 4:00 p.m.**
) **Hearing Date: Only if Objections filed**

**SUMMARY OF TENTH 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 FEBRUARY 1, 2011 THROUGH FEBRUARY 28, 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: February 1, 2011 through February 28, 2011 (the "Compensation
Period")

Amount of Compensation sought
as actual, reasonable and necessary: \$6,483.00

Amount of Expense Reimbursement sought
as actual, reasonable and necessary: \$19.50

This is an: interim final application.

The total time expended for preparation of this fee application is approximately 2 hours and the corresponding compensation of approximately \$400 will be requested in a subsequent fee application.

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

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).

COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours Billed	Total Compensation
Asset Disposition	3.70	\$1,332.00
Business and Financial	1.30	\$468.00
Case Administration	2.30	\$366.00
Litigation	1.20	\$432.00
Omnibus Hearings	5.10	\$1,038.00
Professional Fees	15.20	\$2,847.00
TOTAL	28.80	\$6,483.00

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	\$19.50
TOTAL	\$19.50

Dated: March 21, 2011
Wilmington, Delaware

SULLIVAN • HAZELTINE • ALLINSON LLC

William A. Hazeltine (No. 3294)
901 North Market Street, Suite 1300
Wilmington, DE 19801
Tel: (302) 428-8191
Fax: (302) 428-8195
Email: wahazeltine@sha-ll.com

Attorneys for the Debtor and Debtor in Possession

**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: April 11, 2011 at 4:00 p.m.**
) **Hearing Date: Only if Objections filed**

**TENTH 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 FEBRUARY 1, 2011 THROUGH FEBRUARY 28, 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 February 1, 2011 through and including February 28, 2011 (the “Compensation Period”) in the amount of \$6,483.00 representing 28.80 hours in professional services; and (ii) reimbursement of actual and necessary expenses incurred by

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).

SHA-LLC during the Compensation Period in connection with the rendition of such professional services in the amount of \$19.50 (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 28.80 hours and the compensation sought for the Compensation Period is \$6,483.00. This equates to a blended rate of \$225.10 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 \$19.50. 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) reviewed proposed asset purchase agreement.

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

(c) Case Administration. During the Compensation period, SHA-LLC professionals discussed case status with parties in interest and reviewed client materials at off-site facility.

(d) Litigation. During the compensation period, SHA-LLC professionals reviewed pleadings in committee adversary proceeding.

(e) 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.

(f) 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 TurnPoint Advisors LLC 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:

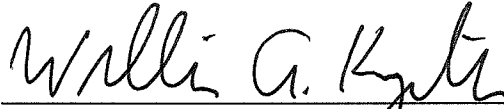
(a) approving the allowance of compensation for professional services that were rendered by SHA-LLC to the Debtors during the period from February 1, 2011 through and including February 28, 2011 in the amount of \$6,483.00;

(b) approving the reimbursement of SHA-LLC's expenses incurred in connection with the rendering of such services in the amount of \$19.50; and

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

Dated: March 21, 2011
Wilmington, Delaware

SULLIVAN • HAZELTINE • ALLINSON LLC



William A. Hazeltine (No. 3294)
901 North Market Street, Suite 1300
Wilmington, DE 19801
Tel: (302) 428-8191
Fax: (302) 428-8195
Email: whazeltine@sha-llc.com

Attorneys for the Debtor and Debtor-in-Possession

Exhibit A

SULLIVAN HAZELTINE ALLINSON LLC

**Attorneys and Counselors at Law
901 North Market Street, Suite 1300
Wilmington, DE 19801
Tax ID # 20-5238500**

**Tel: (302) 428-8191
Fax:(302) 428-8195**

March 11, 2011
Invoice # 13154

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>		
2/1/2011 WAH Review comments re form asset purchase agreement for patent sale and revise agreement	0.70	252.00
WAH Discussion with J. Merritt re: status of patent sale	0.20	72.00
2/8/2011 WAH Draft joint instructions re: release of Damage Funds	0.40	144.00
2/9/2011 WAH Discussions with J. Merritt re: sale of patent	0.40	144.00
2/11/2011 WAH Review Berkenhoff license agreement	0.20	72.00
WAH Discussion with J. Merritt re: sale of patent	0.20	72.00
2/21/2011 WAH Review and comment on proposed asset purchase agreement for brush patent	1.40	504.00
2/28/2011 WAH Discussion with J. Merritt re: sale of land and brush patent	0.20	72.00
SUBTOTAL:	[3.70	1,332.00]

Business and Financial

2/1/2011 WAH Review records re: board meetings and communications re: same	0.60	216.00
2/23/2011 WAH Board Meeting	0.70	252.00
SUBTOTAL:	[1.30	468.00]

		<u>Hours</u>	<u>Amount</u>
<u>Case Administration</u>			
2/9/2011	WAH Discussion with counsel for Highland re: case status	0.10	36.00
2/23/2011	HMC review of client material at off-site storage facility; correspondence with Jon Daniel	2.20	330.00
SUBTOTAL:		[2.30	366.00]
<u>Litigation</u>			
2/7/2011	WAH Review recent pleadings in committee adversary proceeding	1.20	432.00
SUBTOTAL:		[1.20	432.00]
<u>Omnibus Hearings</u>			
2/7/2011	HMC Draft agenda and exhibit a for fee applications for the February 11, 2011 hearing	1.20	180.00
	WAH Agenda for February 11 hearing	0.40	144.00
2/8/2011	HMC Revise agenda and exhibit A for February 11, 2011 hearing (.4); draft notice of filing executed exhibit (.3); draft certification of counsel for settlement motion (.5)	1.20	180.00
	WAH Review and comment on Notice of Filing Exhibit for Acton/FPE settlement; certificate of counsel for Acton/FPE settlement and revised agenda	0.50	180.00
2/9/2011	HMC Revise agenda and prepare hearing binders for February 11, 2011 hearing; coordinate filing and service of same	1.40	210.00
2/11/2011	WAH Attend omnibus hearing	0.40	144.00
SUBTOTAL:		[5.10	1,038.00]
<u>Professional Fees</u>			
2/1/2011	HMC Prepare second quarterly fee application summary and fee application binder	4.20	630.00
2/2/2011	HMC Draft third and fourth staffing reports and notices for TurnPoint	1.60	240.00
	HMC Draft SHA's January 2011 fee application, summary and notice	1.20	180.00
2/4/2011	WAH Review and comment on interim fee application binder summary	1.10	396.00
	HMC Revise summary of fee application binder for February 11, 2010 hearing; meeting with WAH	1.30	195.00
2/7/2011	WAH Draft omnibus order on fee applications	0.30	108.00
2/8/2011	WAH Communications re: payment of Merritt Sadler fees	0.20	72.00
	WAH Review and comment on SHA January fee application	0.50	180.00

	<u>Hours</u>	<u>Amount</u>
2/8/2011 WAH Review and comment on Turnpoint 3rd and 4th monthly staffing reports	0.40	144.00
2/9/2011 HMC Review and revise SHA's January 2011 fee application, summary and billing statement	0.30	45.00
HMC Draft fifth fee application for TurnPoint	0.50	75.00
2/10/2011 HMC Revise fee application, summary and notice; file and coordinate service of same	0.40	60.00
2/11/2011 WAH Revise SHA January fee application and prepare for filing	0.20	72.00
2/15/2011 HMC Revise third and fourth month fee applications for TurnPoint	0.40	60.00
2/22/2011 HMC Prepare seventh monthly fee application of Merritt Sadler; correspondence with Jeff Merritt; review of docket entries (1.80); prepare, file and coordinate service of certification of no objection for Merritt Sadler's fifth and sixth fee applications	2.60	390.00
 SUBTOTAL:	<u>15.20</u>	<u>2,847.00]</u>
For professional services rendered	28.80	\$6,483.00
Additional Charges :		
<u>Omnibus Hearings</u>		
2/4/2011 Courier Service		6.50
2/8/2011 Courier Service		6.50
2/10/2011 Courier Service		6.50
 SUBTOTAL:		<u>[19.50]</u>
Total additional charges		<u>\$19.50</u>
 Total amount of this bill		<u>\$6,502.50</u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Heidi Coleman	18.50	150.00	\$2,775.00
William A. Hazeltine	10.30	360.00	\$3,708.00