

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

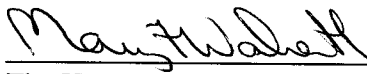
In Re: _____ : Chapter 11
: :
MOLL INDUSTRIES, INC., *et al.*,¹ : Case No. 10-11371 (MFW)
: (Jointly Administered)
Debtors. : :
: :
RE: Document No. 605

**ORDER APPROVING STIPULATION BETWEEN DEBTOR AND FORMER
DIRECTORS AND OFFICERS REGARDING THE ADVANCEMENT OF DEFENSE
EXPENSES UNDER INSURANCE POLICY NOTWITHSTANDING 11 U.S.C. § 362**

AND NOW, this 2^d day of June, 2011, upon consideration of the Motion to
Approve Stipulation Between Debtor and Former Directors and Officers Regarding the
Advancement of Defense Expenses Under Insurance Policy Notwithstanding 11 U.S.C. § 362, it
is hereby:

ORDERED as follows:

1. The Motion is GRANTED.
2. The Stipulation attached hereto as Exhibit A is APPROVED, solely to the extent
that the advances for the defense costs set forth therein shall be made solely from applicable
insurance and not from the above captioned Debtors' jointly administered estates.



The Honorable Mary F. Walrath,
U.S. Bankruptcy Judge

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).

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In Re:	:	Chapter 11
MOLL INDUSTRIES, INC., et al., ¹	:	Case No. 10-11371 (MFW)
Debtors.	:	Jointly Administered

**STIPULATION AND ORDER BETWEEN DEBTOR AND FORMER DIRECTORS AND
OFFICERS REGARDING THE ADVANCEMENT OF DEFENSE EXPENSES UNDER
INSURANCE POLICY NOTWITHSTANDING 11 U.S.C. § 362**

WHEREAS, Indian Harbor Insurance Company (“Indian Harbor”) issued Private Company Insurance Policy No. ELU115540-09 to Debtor Moll Industries, Inc. (the “Debtor”) for the policy period December 31, 2009 to December 31, 2010 (the “Policy”);

WHEREAS, on April 27, 2010, the Debtor filed a petition under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101, et seq.;

WHEREAS, Paul Adkins, Kevin Andrews, Jim Campbell, Patrick Daugherty, Reece Fulgham, John Honis, Charles McQueary, W. Carl Moore Jr., Gordon Joe Pack and Tom Pereira (collectively, the “Individual Defendants”) were named as defendants in the adversary proceeding captioned *Official Committee of Unsecured Creditors of Moll Industries, Inc. v. Highland Capital Management, L.P., et al.*, Adv. Pro. No. 10-53291 (Bankr. D. Del.) (the “Litigation”);

WHEREAS, Indian Harbor has received notice under the Policy of the Litigation;

WHEREAS, the Individual Defendants have incurred and may continue to incur defense fees and costs in connection with the Litigation;

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WHEREAS, Indian Harbor has indicated that it is willing to advance certain Defense Expenses (as that term is defined in the Policy) under the Policy in connection with the Litigation to or on behalf of the Individual Defendants, subject to mutual reservations of rights;

WHEREAS, Section III.Q of the Policy's General Terms and Conditions provides that, if Moll Industries, Inc. undergoes any liquidation or reorganization proceeding under Title 11 of the United States Code, it agrees "not to oppose or object to any efforts by the Insurer or any Insured to obtain relief from any stay or injunction applicable to the proceeds of this Policy as a result of the commencement of such liquidation or reorganization proceeding"; and

WHEREAS, the advancement of Defense Expenses may be deemed to implicate the automatic stay of 11 U.S.C. § 362 and thus the parties seek the Court's approval of this stipulation.

IT IS NOW THEREFORE STIPULATED AND AGREED that, notwithstanding the automatic stay of 11 U.S.C. § 362, to the extent applicable, Indian Harbor shall be and hereby is authorized to make payments under the Policy to or for the benefit of the Individual Defendants.

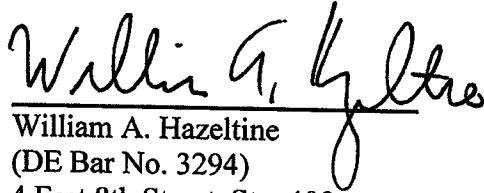
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for Defense Expenses incurred in connection with the Litigation.

Dated: May 12, 2011

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