

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

In Re: ) Chapter 11  
)  
MOLL INDUSTRIES, INC., ) Case No. 10-11371 ( )  
13455 Noel Road, Suite 1310 )  
Dallas, TX 75240 )  
)  
Debtor. )

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In Re: ) Chapter 11  
)  
MOLL HOLDINGS, INC., ) Case No. 10-11372 ( )  
13455 Noel Road, Suite 1310 )  
Dallas, TX 75240 )  
)  
Debtor. )

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In Re: ) Chapter 11  
)  
MOLL EUROPE HOLDINGS, LLC ) Case No. 10-11373 ( )  
13455 Noel Road, Suite 1310 )  
Dallas, TX 75240 )  
)  
Debtor. )

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In Re: ) Chapter 11  
)  
MOLL LATIN AMERICA HOLDINGS, LLC, ) Case No. 10-11374 ( )  
13455 Noel Road, Suite 1310 )  
Dallas, TX 75240 )  
)  
Debtor. )

**MOTION OF DEBTORS FOR ORDER DIRECTING JOINT ADMINISTRATION OF  
CASES PURSUANT TO BANKRUPTCY RULE 1015 AND LOCAL RULE 1015-1**

The debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby move (the “Motion”) this Court for an entry of an order, pursuant to Rule 1015 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 1015-1

Docket No. 3  
Date 4.27.10

of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), providing for the joint administration of the Debtors’ separate chapter 11 cases for procedural purposes only. In support of the Motion, the Debtors rely on and incorporate by reference the Declaration of Jeffrey C. Merritt in Support of First Day Motions and Applications (the “Merritt Declaration”), filed with Court concurrently herewith. In further support of this Motion, the Debtors, by and through their undersigned counsel, state the following:

### **JURISDICTION**

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of these cases and this Motion in this district is proper under §§ 1408 and 1409. The statutory predicates for the relief requested herein are Bankruptcy Rule 1015 and Local Rule 1015-1.

### **BACKGROUND**

2. On or about April 27, 2010 (the “Petition Date”), each of the Debtors filed a voluntary petition pursuant to Chapter 11 of the Bankruptcy Code commencing the above captioned cases, which the Debtors have requested be jointly administered for procedural purposes. The Debtors are operating as debtors-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

3. No committee has yet been appointed or designated.

4. The Debtors are a significant provider of global injection molding and full-service contract manufacturing solutions for the medical, appliance, industrial, consumer and automotive markets. They are also specialists in drug delivery, surgical devices, enclosures and fluid delivery products, and are considered one of the most experienced full-service contract

manufacturer of custom injection molded components and assemblies to the appliance industry in North America. They have registered medical device establishment with the FDA in their manufacturing facilities in Seagrove, North Carolina and Donegal, Ireland.

5. For a description of the Debtors' business and the events leading up to the Petition Date, the Debtors respectfully refer the Court to the Merritt Declaration.

### **RELIEF REQUESTED**

6. By this Motion, the Debtors seek entry of an order, pursuant to Bankruptcy Rule 1015 and Local Rule 1015-1, consolidating the Debtor's chapter 11 cases for procedural purposes only.

7. Many of the motions, applications, hearings and orders that will arise in these chapter 11 cases will jointly affect each Debtor. For this reason, the Debtors respectfully submit that the interest of the Debtors, their creditors and other parties a t interest would be best served by the joint administration of these chapter 11 cases. In order to optimally and economically administer the Debtors' pending chapter 11 cases, such cases should be jointly administered for procedural purposes only, under the case number assigned to Moll Industries, Inc..

8. The Debtors also request that the Clerk of the Court maintain one file and one docket for all of the Debtors' chapter 11 cases, which shall be the file and docket for Moll Industries, Inc.

9. In furtherance of the foregoing, the Debtors request that the official caption to be used by all parties in all pleadings in the jointly administered cases be as follows:

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

In Re:	)	Chapter 11
	)	
MOLL INDUSTRIES, INC., <i>et al.</i> ,	)	Case No. 10-11371 (___)
	)	
Debtor.	)	Jointly Administered
	)	

10. In addition, the Debtors request that a separate docket entry be made on each Debtor's docket (except that of Moll Industries, Inc.'s) substantially as follows:

An order has been entered in this case directing the consolidation and joint administration for procedural purposes of the chapter 11 cases of: Moll Industries, Inc.; Moll Holdings, Inc.; Moll Europe Holdings, LLC; and Moll Latin America Holdings, LLC. The docket in the chapter 11 case of Moll Industries, Inc., Case No. 10-11371 (\_\_\_) should be consulted for all matters affecting this case.

11. Bankruptcy Rule 1015(b) provides that if two or more petitions are pending in the same court by or against a debtor and an affiliate, the court may order joint administration of the estates of the debtor and such affiliates. Local Rule 1015-1 similarly provides for joint administration of chapter 11 cases when the facts demonstrate that joint administration "is warranted and will ease the administrative burden for the court and the parties." Del. Bankr. L.R. 1015.

12. The Debtors in these proceedings include Moll Industries, Inc. ("Moll") and three of its affiliates (the "Affiliate Debtors"). Moll is a direct or indirect parent or owner of all of the Affiliate Debtors, in whole or in part with other Affiliate Debtors. As such, Moll and the Affiliate Debtors are "Affiliates" as that term is defined in section 101(2) of the Bankruptcy Code. See 11 U.S.C. §§ 101(2). Thus, joint administration of the Debtors' cases is appropriate.

13. Moreover, the joint administration of the Debtor's chapter 11 cases will permit the Clerk of the Court to use a single general docket for each of the Debtors' cases and to

combine notices to creditors and other parties at interest of the Debtors' respective estates. Indeed, the Debtors anticipate that numerous notices, motions, other pleadings, hearings and orders in these cases will affect several of the Debtors.

14. Joint Administration will also save time and money and avoid duplicative and potentially confusing filings by permitting counsel for all parties in interest to (a) use a single caption on the numerous documents that will be served and filed herein and (b) file the papers in one case rather than multiple cases. Finally joint administration will protect parties in interest by ensuring that parties of each of the Debtors' respective chapter 11 cases will be apprised of the various matters before the Court in these cases.

15. Nor will any party be prejudiced by virtue of the relief requested in this Motion. Specifically, the relief sought herein is solely procedural and is not intended to affect substantive rights. Indeed, the relief requested herein is commonly granted in this District. See, e.g., In re Interlake Material Handling, Inc., Case No. 09-10019 (Bankr. D. Del. Jan. 7, 2009) (Carey, C.J.)(order directing joint administration of Chapter 11 case); In re KB Holdings, LLC, Case No. 08-13269 (Bankr. D. Del. Dec. 12, 2008) (Carey, C.J.) (same); In re Hilex Poly Co. LLC, Case No. 08-10890 (Bankr. D. De. May 6, 2008) (Carey, C.J.) (same); In re Buffets Holdings, Inc., Case No, 08-10141 (Bankr. D. Del. Jan. 22, 2008) (Walrath, J.) (same).

16. For these reasons, the Debtors submit that the relief requested herein is in the best interest of the Debtors, their estates, creditors and other parties in interest and, therefore, should be granted.

**NOTICE**

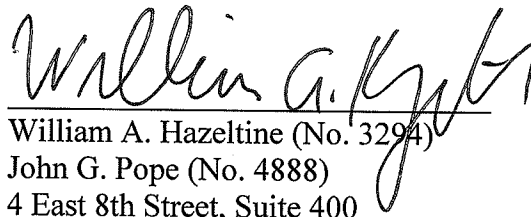
17. Notice of this Motion has been served on (i) the Office of the United States Trustee for the District of Delaware; (ii) each of the Debtors' twenty largest unsecured creditors and/or their counsel; (iii) counsel for NexBank, SSB, as Administrative Agent and Collateral Agent for the Debtors' pre-petition secured lenders; (iv) the United States Department of Justice; (v) the Internal Revenue Service, (vi) the United States Environmental Protection Agency, (vii) the Banks; (viii) the administrators of the Debtors' Employee Benefit Plans; and (ix) all parties that have requested special notice pursuant to Bankruptcy Rule 2002. Notice of the Motion and any order entered hereon will be served on all parties required by Local Rule 9013-1(m). Due to the urgency of the circumstances surrounding this Motion and the nature of the relief requested, the Debtors respectfully submit that no further notice of this Motion is required.

**CONCLUSION**

WHEREFORE, the Debtors respectfully request that the Court enter an Order, substantially in the form attached hereto as Exhibit A, granting the relief requested in the Motion and such other further relief as may be just and proper.

Date: April 27, 2010  
Wilmington, Delaware

**SULLIVAN • HAZELTINE • ALLINSON LLC**



William A. Hazeltine (No. 3294)

John G. Pope (No. 4888)

4 East 8th Street, Suite 400

Wilmington, DE 19801

Telephone: (302) 428-8191

Facsimile: (302) 428-8195

*Proposed Attorneys for the Debtors and  
Debtors-in-Possession*

# Exhibit A

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

In Re:	)	Chapter 11
	)	
MOLL INDUSTRIES, INC.,	)	Case No. 10-11371 ( )
13455 Noel Road, Suite 1310	)	
Dallas, TX 75240	)	
Debtor.	)	
<hr/>		
In Re:	)	Chapter 11
	)	
MOLL HOLDINGS, INC.,	)	Case No. 10-11372 ( )
13455 Noel Road, Suite 1310	)	
Dallas, TX 75240	)	
Debtor.	)	
<hr/>		
In Re:	)	Chapter 11
	)	
MOLL EUROPE HOLDINGS, LLC	)	10-11373 ( )
13455 Noel Road, Suite 1310	)	
Dallas, TX 75240	)	
Debtor.	)	
<hr/>		
In Re:	)	
	)	
MOLL LATIN AMERICA HOLDINGS, LLC,	)	10-11374 ( )
13455 Noel Road, Suite 1310	)	
Dallas, TX 75240	)	
Debtor.	)	
<hr/>		
	)	<b>Related Docket No. _____</b>

**ORDER DIRECTING JOINT ADMINISTRATION OF CASES  
PURSUANT TO BANKRUPTCY RULE 1015 AND LOCAL RULE 1015-1**

Upon the Motion (the "Motion") of the Debtors for an order, pursuant to Bankruptcy Rule 1015 and Local Rule 1015-1, directing joint administration of these cases and administratively consolidating the respective chapter 11 cases of each Debtor for procedural

purposes only; and upon consideration of the Declaration of Jeffrey C. Merritt in Support of First Day Motions and Applications; and the Court finding that (a) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and (c) notice of the Motion was due and proper under the circumstances; and it appearing that the relief requested in the Motion is in the best interests of the Debtors, their estates and creditors; and after due deliberation, and good and sufficient cause appearing therefore, it is hereby

**ORDERED, ADJUDGED, AND DECREED that:**

1. The Motion is GRANTED.
2. The above-captioned cases are consolidated for procedural purposes only and shall be administered jointly under Case No. 10-11371 ( ) in accordance with the provisions of Bankruptcy Rule 1015 and Local Rule 1015-1.
3. The official caption to be used by all parties in all pleadings in the jointly administered cases be as follows:

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

In Re:	)	Chapter 11
	)	
MOLL INDUSTRIES, INC., <i>et al.</i> ,	)	Case No. 10-11371 ( )
	)	
Debtor.	)	Jointly Administered
	)	

4. In addition, the Debtors request that a separate docket entry be made on each Debtor's docket (except that of Moll Industries, Inc.'s) substantially as follows:

An order has been entered in this case directing the consolidation and joint administration for procedural purposes of the chapter 11 cases of: Moll Industries, Inc.; Moll Holdings, Inc.; Moll Europe Holdings, LLC; and Moll Latin America

Holdings, LLC. The docket in the chapter 11 case of Moll Industries, Inc., Case No. 10-11371 ( ) should be consulted for all matters affecting this case.

5. This court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation.

Dated: April \_\_\_\_, 2010  
Wilmington, Delaware

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United States Bankruptcy Judge

**File a First Day Motion:**10-11371 Moll Industries, Inc.

Type: bk

Chapter: 11 v

Office: 1 (Delaware)

Assets: y

Case Flag: PlnDue, DsclsDue

**U.S. Bankruptcy Court****District of Delaware**

## Notice of Electronic Filing

The following transaction was received from William A. Hazeltine entered on 4/27/2010 at 3:39 PM EDT and filed on 4/27/2010

**Case Name:** Moll Industries, Inc.**Case Number:** 10-11371**Document Number:** 3**Docket Text:**

Motion for Joint Administration Filed By Moll Industries, Inc. (Hazeltine, William)

The following document(s) are associated with this transaction:

**Document description:**Main Document**Original filename:**C:\fakepath\Joint Administration Motion.pdf**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=983460418 [Date=4/27/2010] [FileNumber=8394857-0]  
[1294c12c66183213e3518a303decf618368e1c4b79f04360a5d373e9bb3a58c03397  
65b3a9165fd43d328bce9155138b74f5ae2c63b09525f4c5bf9e2b998b7]]

**10-11371 Notice will be electronically mailed to:**

William A. Hazeltine on behalf of Debtor Moll Industries, Inc.  
Bankruptcy001@sha-llc.com

United States Trustee  
USTPREGION03.WL.ECF@USDOJ.GOV

**10-11371 Notice will not be electronically mailed to:**

**File a First Day Motion:**10-11372 Moll Holdings, Inc.

Type: bk

Chapter: 11 v

Office: 1 (Delaware)

Assets: y

Case Flag: PlnDue, DsclsDue

**U.S. Bankruptcy Court****District of Delaware**

## Notice of Electronic Filing

The following transaction was received from William A. Hazeltine entered on 4/27/2010 at 3:40 PM EDT and filed on 4/27/2010

**Case Name:** Moll Holdings, Inc.**Case Number:** 10-11372**Document Number:** 3**Docket Text:**

Motion for Joint Administration Filed By Moll Holdings, Inc. (Hazeltine, William)

The following document(s) are associated with this transaction:

**Document description:**Main Document**Original filename:**C:\fakepath\Joint Administration Motion.pdf**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=983460418 [Date=4/27/2010] [FileNumber=8394869-0]  
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f8f61f5aadbe82b94659f53bc1cd747da3f3b3acea106ead96f229ea935c]]

**10-11372 Notice will be electronically mailed to:**

William A. Hazeltine on behalf of Debtor Moll Holdings, Inc.  
Bankruptcy001@sha-llc.com

United States Trustee  
USTPREGION03.WL.ECF@USDOJ.GOV

**10-11372 Notice will not be electronically mailed to:**

**File a First Day Motion:**10-11373 Moll Europe Holdings, LLC

Type: bk

Chapter: 11 v

Office: 1 (Delaware)

Assets: y

Case Flag: PlnDue, DsclsDue

**U.S. Bankruptcy Court****District of Delaware**

## Notice of Electronic Filing

The following transaction was received from William A. Hazeltine entered on 4/27/2010 at 3:41 PM EDT and filed on 4/27/2010

**Case Name:** Moll Europe Holdings, LLC**Case Number:** 10-11373**Document Number:** 3**Docket Text:**

Motion for Joint Administration Filed By Moll Europe Holdings, LLC (Hazeltine, William)

The following document(s) are associated with this transaction:

**Document description:**Main Document**Original filename:**C:\fakepath\Joint Administration Motion.pdf**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=983460418 [Date=4/27/2010] [FileNumber=8394875-0]

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743811ee8e55e7159913e8c861c6f20ef39d1c36e43ca134abb300dcc6b3]]

**10-11373 Notice will be electronically mailed to:**William A. Hazeltine on behalf of Debtor Moll Europe Holdings, LLC  
Bankruptcy001@sha-llc.com

United States Trustee

USTPREGION03.WL.ECF@USDOJ.GOV

**10-11373 Notice will not be electronically mailed to:**

**File a First Day Motion:**

10-11374 Moll Latin America Holdings, LLC

Type: bk

Chapter: 11 v

Office: 1 (Delaware)

Assets: y

Case Flag: PlnDue, DsclsDue

**U.S. Bankruptcy Court**

**District of Delaware**

Notice of Electronic Filing

The following transaction was received from William A. Hazeltine entered on 4/27/2010 at 3:41 PM EDT and filed on 4/27/2010

**Case Name:** Moll Latin America Holdings, LLC

**Case Number:** 10-11374

**Document Number:** 2

**Docket Text:**

Motion for Joint Administration Filed By Moll Latin America Holdings, LLC (Hazeltine, William)

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**C:\fakepath\Joint Administration Motion.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=983460418 [Date=4/27/2010] [FileNumber=8394887-0]  
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a4c083681adbee6328b1d69d0e86654648478bc97053b0b133cb59396e45]]

**10-11374 Notice will be electronically mailed to:**

William A. Hazeltine on behalf of Debtor Moll Latin America Holdings, LLC  
Bankruptcy001@sha-llc.com

United States Trustee  
USTPREGION03.WL.ECF@USDOJ.GOV

**10-11374 Notice will not be electronically mailed to:**