

**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.) **Related Docket Nos. 8 and 30**
)
) Objection deadline: May 13, 2010 at 4:00 p.m.
) Hearing Date: May 20, 2010 at 3:00 p.m.

**NOTICE OF ENTRY OF INTERIM ORDER GRANTING MOTION OF THE
DEBTORS FOR ORDER PURSUANT TO SECTIONS 105, 361, 362, 363, 364,
1107 AND 1108 OF THE BANKRUPTCY CODE AUTHORIZING DEBTORS
TO (I) MAINTAIN EXISTING INSURANCE POLICIES AND PAY ALL POLICY
PREMIUMS ARISING THEREUNDER OR IN CONNECTION THEREWITH
AND (II) CONTINUE INSURANCE PREMIUM FINANCING PROGRAMS
AND PAY INSURANCE PREMIUM FINANCING OBLIGATIONS
ARISING THEREUNDER OR IN CONNECTION THEREWITH**

PLEASE TAKE NOTICE, that on April 30, 2010, in connection with the Debtors' *Motion of the Debtors for Order Pursuant to Sections 105, 361, 362, 363, 364, 1107 and 1108 of the Bankruptcy Code Authorizing Debtors to (I) Maintain Existing Insurance Policies and Pay All Policy Premiums Arising Thereunder or in Connection Therewith and (II) Continue Insurance Premium Financing Programs and Pay Insurance Premium Financing Obligations Arising Thereunder or in Connection Therewith*, (the "Motion") (D.I. No. 8), which was previously served on you, the Court entered its *Interim Order Pursuant to Sections 105, 361, 362, 363, 364, 1107 and 1108 of the Bankruptcy Code Authorizing Debtors to (I) Maintain Existing Insurance Policies and Pay All Policy Premiums Arising Thereunder or in Connection Therewith and (II) Continue Insurance Premium Financing Programs and Pay Insurance*

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).

Docket No. 37
Date 4.30.10

Premium Financing Obligations Arising Thereunder or in Connection Therewith, (the “Interim Order”), (D.I. 30). A copy of the Interim Order is attached as Exhibit A.

PLEASE TAKE FURTHER NOTICE, that the final hearing on the relief requested in the Motion with respect to the Travelers Note (as defined in the Motion) shall be held before the Honorable Mary F. Walrath at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Courtroom 4, Wilmington, DE 19801 on **May 20, 2010, at 3:00 p.m.**, prevailing Eastern Time.

PLEASE TAKE FURTHER NOTICE, that Objections, if any, to the relief sought in the Motion on a final basis shall be in writing, shall set forth with particularity the grounds for such Objection or other statement of position and shall be filed with the Clerk of the Bankruptcy Court and served by e-mail, hand delivery, or facsimile upon:

- (i) the attorneys for the Debtors, William A. Hazeltine, Esquire (whazeltine@shallc.com), Sullivan Hazeltine Allinson LLC, 4, East 8th Street, Suite 400, Wilmington, DE 19801;
- (ii) the trial attorney for the Office of the United States Trustee, David L. Buchbinder, Esquire (David.L.Buchbinder@usdoj.gov), fax number (302) 573-6497, 844 King Street, Suite 2207, Wilmington, DE 19801;
- (iii) the attorneys for NexBank, SSB, as administrative agent, Michael R. Lastowski, Esquire (MLastowski@duanemorris.com), Duane Morris, LLP, fax number 302-397-0801, 1100 North Market Street, Suite 1200, Wilmington, DE 19801; and Mark X. Mullin, Esquire (mark.mullin@haynesboone.com), fax number 214-651-5940, Haynes and Boone, LLP, 2323 Victory Avenue, Suite 700, Dallas, TX 75219; and
- (iv) the attorneys for any official committee appointed in these cases.

so as to be filed with the Court and received by said parties on or before 4:00 p.m., prevailing Eastern Time on **May 13, 2010**.

PLEASE TAKE FURTHER NOTICE, THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY MOTION ON A FINAL BASIS WITHOUT FURTHER NOTICE OR HEARING.

Dated: April 30, 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

Tel: (302) 428-8191

Fax: (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., <i>et al.</i> , ¹)	Case No. 10-11371 (MFW)
)	Joint Administration Pending
Debtors.)	Related Docket No. 8

**INTERIM ORDER GRANTING MOTION OF THE DEBTORS FOR ORDER
PURSUANT TO SECTIONS 105, 361, 362, 363, 364, 1107 AND 1108 OF THE
BANKRUPTCY CODE AUTHORIZING DEBTORS TO (I) MAINTAIN
EXISTING INSURANCE POLICIES AND PAY ALL POLICY PREMIUMS
ARISING THEREUNDER OR IN CONNECTION THEREWITH
AND (II) CONTINUE INSURANCE PREMIUM FINANCING
PROGRAMS AND PAY INSURANCE PREMIUM FINANCING
OBLIGATIONS ARISING THEREUNDER OR IN CONNECTION THEREWITH**

Upon consideration of the motion (the "Motion")² of the Debtors for an order, under sections 105, 361, 362, 363, 364, 1107 and 1108 of the Bankruptcy Code and Bankruptcy Rule 6003, authorizing the Debtors to (i) maintain their existing insurance policies and pay all policy premiums arising thereunder or in connection therewith and (ii) continue their insurance premium financing programs and pay insurance premium financing obligations arising thereunder or in connection therewith; and upon consideration of the Declaration of Jeffrey C. Merrill 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

¹ The Debtors are the following entities: Moll Industries, Inc.; Moll Holdings, Inc.; Moll Europe Holdings, LLC; and Moll Latin America Holdings, LLC.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

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 to the extent set forth herein.
2. The Debtors are authorized, but not directed, to maintain and continue to make all postpetition payments (including postpetition fees and premiums) with respect to the Insurance Policies and the Premium Finance Agreement on an uninterrupted basis.
3. Other than with respect to the Travelers Note, the Debtors are authorized, but not directed, to pay any prepetition premiums and deductibles related to the Insurance Policies and/or the Premium Financing Arrangements, in an amount up to a maximum of \$15,000, to the extent that the Debtors determine, in their discretion, that such payment is necessary to avoid cancellation, default, alteration, assignment, attachment, lapse or any form of impairment to the coverage, benefits or proceeds provided under the Insurance Policies.
4. The Debtors are authorized, but not directed, to maintain and continue on an uninterrupted basis the Debtors' prepetition practices with respect to the Insurance Policies and the Premium Financing Arrangements, including the payment of the premiums due on the Premium Financing Arrangements, and to enter into new Insurance Policies and Premium Financing Arrangements in the exercise of their business judgment.
5. Pending the entry of a final order, the Debtors are not authorized to make any payments with respect to the Travelers Note. A final hearing will be held on May 20, 2010 at 3:00 p.m. prevailing Eastern time to consider the relief requested by the Debtors' with respect to the Travelers Note. Objections to the Motion, if any, must be filed and served so as to be

received by counsel for the Debtors no later than 4:00 p.m. on the day that is seven days prior to the final hearing. In the absence of an objection, the Court may enter the relief requested in the Motion without further notice or a hearing.

6. The Court finds and determines that the requirements of Bankruptcy Rule 6003 are satisfied and that the relief requested is necessary to avoid immediate and irreparable harm.

7. Neither the provisions contained herein, nor any actions or payments made by the Debtors pursuant to this Order, shall be deemed an assumption of any executory contract arising out of an existing financing program, agreement, or contract, or otherwise shall constitute a waiver of the Debtors' rights under section 365 of the Bankruptcy Code or an admission by the Debtors that any such financing program, agreement or contract constitutes an executory contract within the meaning of section 365 of the Bankruptcy Code.

8. Neither the provisions contained herein, nor any actions or payments made by the Debtors pursuant to this Order, shall be deemed an admission as to the validity of the underlying obligations or a waiver of any rights the Debtors may have to subsequently dispute such obligation on any ground that applicable law permits.

9. The Debtors, their officers, employees and agents are authorized to take or refrain from taking such acts as are necessary and appropriate to implement and effectuate the relief granted herein.

10. Notwithstanding anything to the contrary herein, any payment made pursuant to this Order shall be subject to any requirements imposed on the Debtors under any order entered by the Court with respect to the use of cash collateral.

11. Notwithstanding the possible applicability of Bankruptcy Rules 6004, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

12. The Court shall retain jurisdiction over any matters arising from or related to the implementation or interpretation of this Order.

Dated: April, 29, 2010
Wilmington, Delaware



THE HONORABLE BRENDAN L. SHANNON
UNITED STATES BANKRUPTCY JUDGE

File a Notice:10-11371-MFW Moll Industries, Inc.

Type: bk

Chapter: 11 v

Office: 1 (Delaware)

Assets: y

Judge: MFW

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 4/30/2010 at 12:47 PM EDT and filed on 4/30/2010

Case Name: Moll Industries, Inc.**Case Number:** 10-11371-MFW**Document Number:** 37**Docket Text:**

Notice of Hearing on *Final Order and Entry of Interim Order* (related document(s)[8], [30]) Filed by Moll Industries, Inc.. Hearing scheduled for 5/20/2010 at 03:00 PM at US Bankruptcy Court, 824 Market St., 5th Fl., Courtroom #4, Wilmington, Delaware. Objections due by 5/13/2010. (Hazeltine, William)

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

Document description:Main Document**Original filename:**C:\fakepath\Notice of Interim Order and Final Hearing - Insurance.pdf**Electronic document Stamp:**

[STAMP bkecfStamp_ID=983460418 [Date=4/30/2010] [FileNumber=8407691-0]

[707d47ec4874402f46be7d7cce6568675aff9fab6466c167e9f351a1a9ef832fffe2

aacef92200d0c0b2fa5883866485c1415f4eccf2e8467e70e57494caeda7]]

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

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

Richard W. Riley on behalf of Creditor NexBank, SSB
rwriley@duanemorris.com

Sommer Leigh Ross on behalf of Creditor NexBank, SSB
slross@duanemorris.com

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

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

Delaware Claims Agency, LLC
230 North Market Street
Wilmington, DE 19801