

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

IN RE:	)	Chapter 11
	)	
MOLL INDUSTRIES, INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 10-11371 (MFW)
	)	
Debtors.	)	Jointly Administered
	)	
	)	Objection Deadline: May 13, 2010 at 4:00 p.m.
	)	Hearing Date: May 20, 2010 at 3:00 p.m.

**NOTICE OF APPLICATION AND HEARING**

PLEASE TAKE NOTICE THAT on April 30, 2010, the Debtors filed their *Application Pursuant to Sections 327(a) and 1107 of the Bankruptcy Code, Fed. R. Bankr. P. 2014(a) and Del. Bankr. L. R. 2014-1 for an Order Authorizing the Employment and Retention of Sullivan Hazeltine Allinson LLC as Counsel for the Debtors and Debtors-In-Possession Nunc Pro Tunc to the Petition Date* (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 **May 13, 2010 at 4:00 p.m., prevailing Eastern Time.**

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held before the Honorable Mary F. Walrath at the Bankruptcy Court, 5<sup>th</sup> Floor, Courtroom 4, on **May 20, 2010 at 3:00 p.m., prevailing Eastern Time.**

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<sup>1</sup> 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. 40  
Date 4-30-10

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTION OR OTHER RESPONSE TO THE MOTION IS TIMELY FILED IN ACCORDANCE WITH THE PROCEDURES SET FORTH ABOVE, THE BANKRUPTCY COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.**

Dated: April 30, 2010  
Wilmington, Delaware

**SULLIVAN • HAZELTINE • ALLINSON LLC**

*/s/ William A. Hazeltine*

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William A. Hazeltine (No. 3294)

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

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

IN RE:	)	Chapter 11
	)	
MOLL INDUSTRIES, INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 10-11371 (MFW)
	)	
Debtors.	)	Jointly Administered

**APPLICATION PURSUANT TO SECTIONS 327(a) AND 1107 OF THE BANKRUPTCY  
CODE, FED. R. BANKR. P. 2014(a) AND DEL. BANKR. L. R. 2014-1 FOR  
AN ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF  
SULLIVAN HAZELTINE ALLINSON LLC AS COUNSEL FOR THE DEBTORS  
AND DEBTORS-IN-POSSESSION NUNC PRO TUNC TO THE PETITION DATE**

Moll Industries, Inc. and its affiliated debtors (the “Debtors”), debtors and debtors-in-possession in the above-captioned chapter 11 cases, hereby submit this application (the “Application”) pursuant to section 327(a) and 1107 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”) and Rule 2014-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States of Bankruptcy Court for the District of Delaware (“Local Rules”), for an order authorizing the Debtors’ retention of Sullivan Hazeltine Allinson LLC (“Sullivan Hazeltine” or the “Firm”) as their bankruptcy counsel nunc pro tunc to the Petition Date. In support of this Application, the Debtors rely on the Declaration of William A. Hazeltine in support of this Application (the Hazeltine Declaration”), which is attached hereto as Exhibit A, and further state the following:

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<sup>1</sup> 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).

## JURISDICTION

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. The statutory predicate for the relief sought herein are sections 327(a) and 1107 of the Bankruptcy Code.
2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

## BACKGROUND

3. On 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.
4. No committee has yet been appointed or designated.
5. Prior to the Petition Date, the Debtors retained Sullivan Hazeltime to represent them in connection with the preparation and filing of these chapter 11 cases.

## RELIEF REQUESTED

6. By this Application, the Debtors respectfully request the entry of an order, pursuant to section 327(a) and 1107 of the Bankruptcy Code, authorizing them to employ and retain Sullivan Hazeltime as their bankruptcy counsel under a general retainer with regard to the filing of these chapter 11 cases and all related matters, effective as of the Petition Date.
7. Debtors seek to retain Sullivan Hazeltime as their attorneys because of the Firm's extensive experience and knowledge in the field of debtors' and creditors' rights and business reorganizations under chapter 11 of the Bankruptcy Code, and because of Sullivan Hazeltime's expertise, experience, and knowledge in practicing before this Court. Furthermore, because of

Sullivan Hazeltine's proximity to the Court, the Firm has the ability to quickly respond to all issues that may arise and other matters in this Court. The Debtors believe that Sullivan Hazeltine is well qualified to represent the Debtors in these chapter 11 cases in an efficient and timely manner.

8. Subject to court approval under section 330(a) of the Bankruptcy Code, compensation will be payable to Sullivan Hazeltine on an hourly basis, plus reimbursement of actual, necessary expenses, and other charges incurred by the Firm. The hourly rates charged by the Firm are consistent with the rates charged in non-bankruptcy matters of this type and are subject to periodic adjustments to reflect economic and other conditions. The specific attorneys and legal assistants presently designated to represent Debtors and their hourly rates include:

William D. Sullivan	Member	\$345
William A. Hazeltine	Member	\$340
Elihu E. Allinson, III	Member	\$295
John G. Pope	Associate	\$200
Heidi M. Coleman	Paralegal	\$125

9. The Firm's hourly rates are set at a level designed to fairly compensate the firm for the work of its professionals and to cover fixed and routine overhead expenses. Hourly rates vary with the experience and seniority of the individuals assigned and may be adjusted by the Firm from time to time.

10. It is Sullivan Hazeltine's policy to charge its clients in all areas of practice for expenses incurred in connection with a client's case. The expenses charged to clients include, among other things, photocopying, witness fees, travel expenses, certain secretarial and other overtime expenses, filing and recording fees, long distance telephone calls, postage, express mail and messenger charges, computerized legal research charges and other computer services, and telecopier charges. The Firm will charge the Debtors for these expenses in a manner and at rates

consistent with charges made generally to its other clients and consistent with the rules and practices of this Court.

11. Pursuant to Local Rule 2016-2, Sullivan Hazeltine has agreed to comply with the requirements contained in any fee guidelines promulgated by the Bankruptcy Court.

12. The professional services that Sullivan Hazeltine will render to the Debtors may include, but shall not be limited to, the following:

- (a) provide legal advice regarding the rules and practices of this Court applicable to the Debtors' powers and duties as debtors-in-possession under the Bankruptcy Code;
- (b) take all necessary action to protect and preserve the Debtors' estates, including the prosecution of actions on the Debtors behalf, the defense of any action commenced against the Debtors, negotiations concerning all litigation in which the Debtors are or may become involved, and objections to claims filed against the Debtors' estates;
- (c) prepare and review on behalf of the Debtors all motions, applications, answers, orders, reports, and papers necessary to the administration of the estate;
- (d) appear before this Court, any appellate courts, and the United States Trustee and protect the interests of the Debtors' estates before such Courts and the United States Trustee;
- (e) perform all other necessary legal services and provide all other necessary legal advice to the Debtors in connection with these chapter 11 cases.

13. To the best of the Debtors' knowledge, and as set forth in the Hazeltine Declaration, Sullivan Hazeltine has not represented the Debtors' creditors, equity security holders, or any other parties in interest, their respective attorneys and/or other professionals in any matter relating to the Debtors or their estates. Except as set forth herein and in the accompanying Hazeltine Declaration, to the best of the Debtors' knowledge, Sullivan Hazeltine has not represented any of the foregoing parties in matters unrelated to the Debtors' estate. Further, Sullivan Hazeltine does not represent any interest adverse to the Debtors' estate.

14. To the best of the Debtors' knowledge, and as set forth in the Hazeltine Declaration, Sullivan Hazeltine is a "disinterested person" as that phrase is defined in section 101(14) of the Bankruptcy Code, and the Firm's employment is necessary and in the best interests of the Debtors and the Debtors' estate.

15. To the best of the Debtors' knowledge, and as set forth in the Hazeltine Declaration, no member or employee of Sullivan Hazeltine is related, to any United States Bankruptcy Judge in this District, the United States Trustee for such District, or any assistant or staff attorney for the United States Trustee.

16. As of the Petition Date, the Debtors did not owe Sullivan Hazeltine any amounts for legal services rendered before the Petition Date and thus Sullivan Hazeltine is not a creditor of the Debtor. As set forth in the Hazeltine Declaration, in anticipation of the bankruptcy filing, Sullivan Hazeltine received the total amount of \$20,000.00 prior to the Petition Date (the "Pre-Petition Retainer"), as a retainer for legal services rendered and expenses incurred (including filing fees) in contemplation of the preparation, commencement, and prosecution of these chapter 11 cases. The Pre-Petition retainer was applied to compensate Sullivan Hazeltine for pre-petition services rendered to the Debtors and reimburse Sullivan Hazeltine for the expenses and costs incurred in rendering such services. A reconciliation of prepetition services credited against the Pre-Petition Retainer through the Petition Date is set forth below.

Date	Retainer Deposit	Payment	Retainer Balance
April 19, 2010	\$20,000.00		\$20,000.00
April 27, 2010		\$19,929.50	\$70.50

The Debtors' remaining retainer balance held in Sullivan Hazeltine's trust account is \$70.50, which will be held pending further Order of this Court for application against post-petition fees and expenses rendered or incurred for or on behalf of Debtors.

**NOTICE**


17. Notice of this Application 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) NexBank, 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, and (vii) all parties that have requested special notice pursuant to Bankruptcy Rule 2002.

**CONCLUSION**

WHEREFORE, the Debtors respectfully request that the Court enter an Order, substantially in the form attached hereto as Exhibit B, authorizing the Debtors to employ and retain Sullivan Hazeltine as bankruptcy counsel for the Debtors *nunc pro tunc* to the Petition Date, and grant such other further relief as is just and proper.

Dated: April 30, 2010  
Wilmington, Delaware

MOLL INDUSTRIES, INC.

By:   
Name: Jeffrey C. Merritt  
Title: Chief Restructuring Officer

# Exhibit A

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

IN RE:	)	Chapter 11
	)	
MOLL INDUSTRIES, INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 10-11371 (MFW)
	)	
Debtors.	)	Jointly Administered

**DECLARATION OF WILLIAM A. HAZELTINE IN SUPPORT OF DEBTORS'  
APPLICATION PURSUANT TO SECTION 327(a) AND 1107 OF THE BANKRUPTCY  
CODE, FED. R. BANKR. P. 2014(a) AND DEL. BANKR. L. R. 2014-1 FOR  
AN ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF  
SULLIVAN HAZELTINE ALLINSON LLC AS COUNSEL FOR THE DEBTORS  
AND DEBTORS-IN-POSSESSION *NUNC PRO TUNC* TO THE PETITION DATE  
AND STATEMENT OF COMPENSATION PAID TO COUNSEL  
PURSUANT TO 11 U.S.C. § 329 AND BANKRUPTCY RULE 2016(b)**

STATE OF DELAWARE	)	
	)	ss:
COUNTY OF NEW CASTLE	)	

I, William A. Hazeltine, being duly sworn, do hereby depose and state the following:

1. I am a member of the law firm of Sullivan Hazeltine Allinson LLC (“Sullivan Hazeltine” or the “Firm”). I am admitted to practice law in the State of Delaware and before the U.S. District Court for the District of Delaware and the United States Court of Appeals for the Third Circuit.

2. I am authorized to make this affidavit on Sullivan Hazeltine’s behalf. I have personal knowledge of the matters stated herein except where I have indicated that I relied on specific information.

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<sup>1</sup> 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).

3. This Affidavit is submitted pursuant to section 329(a) of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the "Bankruptcy Code"), Rules 2014(a) and 2016(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rules 2014-1 and 2016-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States of Bankruptcy Court for the District of Delaware (the "Local Rules"), in support of the application of NexPak Corporation and its affiliated debtors, debtors and debtors-in-possession in the above-captioned chapter 11 cases (the "Debtors"), for an order pursuant to section 327(a) and 1107 of the Bankruptcy Code, authorizing the employment and retention of Sullivan Hazeltine as counsel for the Debtors *nunc pro tunc* to the Petition Date (the "Application").

4. In March, 2010, the Debtors retained Sullivan Hazeltine to represent them as bankruptcy counsel with respect to the Debtors' restructuring efforts and the filing of chapter 11 petitions and related documents because of Sullivan Hazeltine's expertise, experience, and knowledge in practicing before this Court. The Firm is generally familiar with the Debtors' business affairs and the potential legal issues that may arise in the context of these chapter 11 cases.

#### **DISINTERESTEDNESS OF PROFESSIONALS**

5. Sullivan Hazeltine has conducted, and continues to conduct, extensive research into its relationships with the Debtors, their creditors, the equity security holders of record, the Office of the United States Trustee, attorneys and accountants of the foregoing, and other parties interested in these cases.

6. As part of this inquiry, Sullivan Hazeltine obtained from (and relied upon) the Debtors for the names of the following individuals or entities who may be parties in interest to these chapter 11 cases: the Debtors, the members of Debtors' Board of Directors, the

Debtors' executive officers, professionals sought to be retained by the Debtors in this bankruptcy case, the Debtors' secured creditors, the Debtors' thirty (30) largest unsecured creditors and the Debtors' creditor matrix (excluding former employees) (collectively the "Potential Parties in Interest"). Sullivan Hazeltine has reviewed its records regarding contacts and/or conflicts with the Potential Parties in Interest. This inquiry revealed neither Sullivan Hazeltine nor any of its attorneys has represented or has had a relationship with any of the Potential Parties in Interest within the past five (5) years except as set forth below:

(a) Sullivan Hazeltine is co-counsel with Andrews Kurth LLP, in a matter unrelated to these cases.

(b) Sullivan Hazeltine is co-counsel with Haynes and Boone LLP, counsel to Highland Capital Management, in a case unrelated to these cases.

(c) Sullivan Hazeltine previously represented Packaging Corporation of America, which may be a creditor of the Debtors, or an affiliate thereof in a case unrelated to these cases.

(d) Sullivan Hazeltine previously represented Travelers Indemnity Company, which may be a creditor of the Debtors or an affiliate thereof, in a case unrelated to these cases.

(e) Sullivan Hazeltine represents PPG Industries, Inc., which may be a customer of the Debtors or an affiliate thereof, in a case unrelated to these cases.

7. Based on the foregoing, Sullivan Hazeltine is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, in that the Firm, its members and employees:

- (a) are not creditors or insiders of the Debtors;
- (b) are not and were not, within two years before the date of filing of the Debtors' chapter 11 petition, a director, officer, or employee of the Debtors; and
- (c) do not have interests materially adverse to the interest of the estate or of any class of creditors or equity security holders.

8. I am not related, and to the best of my knowledge, no attorney or employee at the Firm is related, to any United States Bankruptcy Judge in this District, the United States Trustee for such District, or any assistant United States Trustee.

**ONGOING RESPONSIBILITIES**

9. At this time, based on information available to it, Sullivan Hazeltine does not anticipate any actual conflicts of interest with the Potential Parties in Interest. The Firm will seek appropriate waivers of any actual conflict of interest should conflicts arise in the future.

10. While Sullivan Hazeltine has undertaken extensive efforts to identify connections with the Debtors and other parties in interest, it is possible that connections with some parties in interest have not yet been identified. Should Sullivan Hazeltine, through its continuing efforts, learn of any new connections of the nature discussed herein, the Firm will promptly so advise the Court by updating this affidavit when necessary.

11. Sullivan Hazeltine will not, while employed by the Debtors, represent any other entity having an adverse interest in the matters upon which the Debtors seek to retain Sullivan Hazeltine during the pendency of this case, with respect to any matter that has any relationship to this matter.

12. I have read the application of the Debtors for an order approving the retention of Sullivan Hazeltine as bankruptcy counsel that accompanies this Declaration and, to the best of my knowledge, information and belief, the contents of said application are true and correct.

### **SERVICES TO BE RENDERED**

13. The Debtors have requested that Sullivan Hazeltine render the following services in connection with this chapter 11 case:

- (a) advise the Debtors with respect to their powers and duties as debtors-in-possession in the continued management and operation of their business and properties;
- (b) take all necessary action to protect and preserve the Debtors' estates, including the prosecution of actions on the Debtors' behalf, the defense of any action commenced against the Debtors, negotiations concerning all litigation in which the Debtors are or may become involved, and objections to claims filed against the Debtors' estates;
- (c) prepare and review on behalf of the Debtors all motions, applications, answers, orders, reports, and papers necessary to the administration of the estates;
- (d) appear before this Court, any appellate courts, and the United States Trustee and protect the interests of the Debtors' estates before such Courts and the United States Trustee;
- (e) perform all other necessary legal services and provide all other necessary legal advice to the Debtors in connection with these chapter 11 cases.

### **PROFESSIONAL COMPENSATION**

14. As of the Petition Date, the Debtors did not owe Sullivan Hazeltine any amounts for legal services rendered before the Petition Date and thus Sullivan Hazeltine is not a creditor of the Debtors. As set forth in the Hazeltine Declaration, in anticipation of the bankruptcy filing, Sullivan Hazeltine received the total amount of \$20,000.00 prior to the Petition Date (the "Pre-Petition Retainer"), as a retainer for legal services rendered and expenses incurred (including filing fees) in contemplation of the preparation, commencement, and prosecution of these chapter 11 cases. The Pre-Petition retainer was applied to compensate Sullivan Hazeltine for pre-petition services rendered to the Debtors and reimburse Sullivan Hazeltine for the expenses and costs incurred in rendering such services. A reconciliation of

prepetition services credited against the Pre-Petition Retainer through the Petition Date is set forth below.

Date	Retainer Deposit	Payment	Retainer Balance
April 19, 2010	\$20,000.00		\$20,000.00
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The Debtors' remaining retainer balance held in Sullivan Hazeltine's trust account is \$70.50, which will be held pending further Order of this Court for application against post-petition fees and expenses rendered or incurred for or on behalf of Debtors.

15. Subject to the approval of this Court and in compliance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and Orders of this Court, Sullivan Hazeltine intends to apply for compensation for professional services rendered in these cases on an hourly basis, plus reimbursement of actual, necessary expenses and costs incurred by the Firm on the Debtors' behalf.

16. Sullivan Hazeltine will charge its customary hourly rates in effect from time to time, which are consistent with the rates charged by Sullivan Hazeltine in bankruptcy and non-bankruptcy matters of this type. These hourly rates are subject to periodic adjustment to reflect economic and other conditions. In addition, it is the Firm's policy to charge its clients in all areas of practice for expenses incurred in connection with the client's matters. The Firm will charge the Debtors for these expenses in a manner and at rates consistent with charges made generally to the Firm's other clients and consistent with the Rules, Procedures and Orders of the Court.

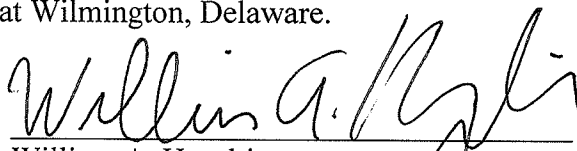
17. The specific attorneys and legal assistants presently designated to represent Debtors and their current hourly rates are:

William D. Sullivan	Member	\$345
William A. Hazeltine	Member	\$340
Elihu E. Allinson, III	Member	\$295
John G. Pope	Associate	\$200
Heidi Coleman	Paralegal	\$125

18. Sullivan Hazeltine further states, pursuant to Bankruptcy Rule 2016(b), that it has not shared, nor agreed to share (a) any compensation it has received or may receive with another party or person, other than with the partners, counsel and associates of Sullivan Hazeltine, or (b) any compensation another person or party has received or may receive.

19. Pursuant to Local Rule 2016-2, Sullivan Hazeltine agrees to and will comply with the requirements contained in any fee guidelines promulgated by the Bankruptcy Court.

Signed this 390<sup>th</sup> day of April, 2010 at Wilmington, Delaware.

  
\_\_\_\_\_  
William A. Hazeltine  
Member  
Sullivan Hazeltine Allinson LLC

# Exhibit B

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

IN RE:	)	Chapter 11
	)	
MOLL INDUSTRIES, INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 10-11371 (MFW)
	)	
Debtors.	)	Jointly Administered
	)	<b>Related Docket No.</b> _____

**ORDER PURSUANT TO SECTION 327(a) AND 1107(a) OF THE BANKRUPTCY  
CODE AUTHORIZING THE EMPLOYMENT AND RETENTION OF SULLIVAN  
HAZELTINE ALLINSON LLC AS COUNSEL FOR DEBTORS AND  
DEBTORS-IN-POSSESSION NUNC PRO TUNC TO THE PETITION DATE**

Upon the Application (the “Application”) of Moll Industries, Inc. and its affiliated debtors (the “Debtors”), debtors and debtors-in-possession in the above-captioned chapter 11 case (the “Debtors”), for entry of an order pursuant to Sections 327(a) and 1107(a) of Title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), authorizing the Debtors to employ and retain the law firm of Sullivan Hazeltine Allinson LLC (“Sullivan Hazeltine” or the “Firm”) as their bankruptcy counsel nunc pro tunc to the Petition Date; and upon the accompanying Declaration of William A. Hazeltine in support of the Application (the “Hazeltine Declaration”); and the Court being satisfied based on the representations made in the Application and the Hazeltine Declaration that the members and employees of Sullivan Hazeltine who will be engaged in these cases represent no interest adverse to Debtors’ estates with respect to the matters upon which they are to be engaged, that Sullivan Hazeltine is a “disinterested person” as that term is defined under Sections 101(14) and 1107(b) of the Bankruptcy Code; and the Court finding that (a) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and

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<sup>1</sup> 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).

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 Application is GRANTED in all respects.
2. In accordance with section 327(a) of the Bankruptcy Code, the Debtors are authorized to employ and retain the Sullivan Hazeltine as their bankruptcy counsel on the terms set forth in the Application and the Hazeltine Declaration, effective as of the Petition Date.
3. Sullivan Hazeltine shall be compensated in accordance with the procedures set forth in Sections 330 and 331 of the Bankruptcy Code, applicable Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules of this Court, and such procedures as may be fixed by order of this Court.
4. This Court shall retain jurisdiction over any and all issues arising from or related to the implementation and interpretation of this Order.

Dated: May \_\_\_\_, 2010

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THE HONORABLE MARY F. WALRATH  
UNITED STATES BANKRUPTCY JUDGE

**File a Motion:**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 4:11 PM EDT and filed on 4/30/2010

**Case Name:** Moll Industries, Inc.**Case Number:** 10-11371-MFW**Document Number:** 40**Docket Text:**

Application to Employ/Retain Sullivan Hazeltine Allinson LLC as Counsel to the Debtors 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. (Attachments: # (1) Notice) (Hazeltine, William)

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

**Document description:**Main Document**Original filename:**C:\fakepath\SHA Retention App.pdf**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=983460418 [Date=4/30/2010] [FileNumber=8409203-0]  
[7dbef2f85eed7e62e64288447140b115a25c0ce21ec084d1d730028d5d8b113c1c7e  
ce4feef62a1efa8c6edcbaf0b5cbda25bb8a478783b9ec504543d4bf3f2a]]

**Document description:**Notice**Original filename:**C:\fakepath\Notice of SHA Retention Application.pdf**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=983460418 [Date=4/30/2010] [FileNumber=8409203-1]  
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84319164404db9d7769a0cf384f4da7efa68c565a41056b6fc249e7c19b3]]

**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