

**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)
)	
Debtors.)	Jointly Administered
)	
)	Related Docket Nos. 8 and 30

CERTIFICATION OF COUNSEL REGARDING DOCKET NO. 8

The undersigned, proposed counsel for Moll Industries, Inc. and its affiliated debtors (the “Debtors”), debtors and debtors-in-possession in the captioned cases, hereby certifies as follows:

1. On April 27, 2010, the Debtors’ filed their *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).

2. On April 29, 2010, the Court entered its *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*, (the “Interim Order”) (Docket No. 32).

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. 76
Date 5-20-10

3. The undersigned certifies that (i) he has received no answer, objection or responsive pleading with respect to the Motion and (ii) he has reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Motion appears thereon.

Pursuant to the Notice of Motion, objections to the Motion were to be filed and served no later than May 14, 2010 at 4:00 p.m. The objection deadline was extended to May 18, 2010 for the Official Committee of Unsecured Creditors (the "Committee"). Counsel for the Committee has confirmed that it has no objection to the entry of an order granting the Motion on a final basis.

4. A proposed Final Order granting the Motion (the "Proposed Final Order" is attached hereto as Exhibit A. A redlined version of the Final Order showing changes from the Interim Order is attached hereto as Exhibit B.

WHEREFORE, the Debtors respectfully request that this Honorable Court enter the Final Order attached hereto as Exhibit A.

Date: May 19, 2010
Wilmington, DE

SULLIVAN • HAZELTINE • ALLINSON LLC

/s/ William A. Hazeltine

William A. Hazeltine (No. 3294)

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Proposed attorneys for 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 and 30

**FINAL 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. The Debtors are authorized, but not directed, to pay the installments due pursuant to the Travelers Note up to a maximum amount of \$56,000 as they become due 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.

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: May __, 2010
Wilmington, Delaware

THE HONORABLE MARY F. WALRATH
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT B

**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. <u>8 and 30</u>

**INTERIM/FINAL 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.~~

5. The Debtors are authorized, but not directed, to pay the installments due pursuant to the Travelers Note up to a maximum amount of \$56,000 as they become due 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.

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~~, ~~___~~, ~~May~~ ~~___~~, 2010
Wilmington, Delaware

THE HONORABLE ~~BRENDAN L.~~
~~SHANNON~~MARY F. WALRATH
UNITED STATES BANKRUPTCY JUDGE

Miscellaneous:10-11371-MFW Moll Industries, Inc.

Type: bk

Chapter: 11 v

Office: 1 (Delaware)

Assets: y

Judge: MFW

Case Flag: LEAD, CLMSAGNT,
PlnDue, DsclsDue**U.S. Bankruptcy Court****District of Delaware**

Notice of Electronic Filing

The following transaction was received from William A. Hazeltine entered on 5/20/2010 at 3:26 PM EDT and filed on 5/20/2010

Case Name: Moll Industries, Inc.**Case Number:** 10-11371-MFW**Document Number:** 76**Docket Text:**

Certification of Counsel (related document(s)[8], [30]) Filed by Moll Industries, Inc.. (Hazeltine, William)

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

Document description:Main Document**Original filename:**C:\fakepath\COC re DI 8.pdf**Electronic document Stamp:**

[STAMP bkecfStamp_ID=983460418 [Date=5/20/2010] [FileNumber=8471286-0]
[26877a7570c7fc8decaf29bab6f953d9333164dd41f263a48c06e944c8ab4b8db3db
39e8f0923944d066b965b2818674348ddf8de38a3ae6afb753eff8bc8d4c]]

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

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Richard W. Riley on behalf of Creditor NexBank, SSB