

**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 No. 99

**MOTION TO SHORTEN NOTICE WITH RESPECT TO
DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER,
PURSUANT TO SECTIONS 105 AND 363(b)(1) AND (F) OF THE
BANKRUPTCY CODE AUTHORIZING DEBTOR MOLL EUROPE
HOLDINGS, LLC TO SELL ITS STOCK IN MOLL INDUSTRIES IRELAND,
LIMITED FREE AND CLEAR OF LIENS, CLAIMS AND ENCUMBRANCES**

Moll Industries, Inc. and its affiliated debtors (collectively, the "Debtors"), debtors and debtors-in-possession in the above captioned Chapter 11 cases, hereby move this Honorable Court for the entry of an order, pursuant to Fed.R.Bankr.P. 9006 and Del. Bankr. L.R. 9006-1(e), shortening the notice period for Debtors' Emergency Motion for Entry of an Order, Pursuant to Sections 105 and 363(b)(1) and (f) of the Bankruptcy Code Authorizing Debtor Moll Europe Holdings, LLC ("MEH") to Sell Its Stock in Moll Industries Ireland Limited ("Moll Ireland") Free and Clear of Liens, Claims and Encumbrances (the "Emergency Motion"). In support of this Motion, the Debtors state as follows:

1. Pursuant to the Emergency Motion, filed contemporaneously with this Motion, the Debtors request authority to sell the Stock² to the Purchaser pursuant to the Heads of Agreement and the APA free and clear of Encumbrances. By this Motion, the Debtors request that the Court schedule a hearing to approve the sale of the Stock on or before June 11, 2010.

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).

² Unless otherwise stated, all capitalized items not defined herein shall have the same meaning as set forth in the Motion.

2. While Fed. R. Bankr. P. 2002(a)(2) normally requires 21 days notice of a motion requesting a sale of property of the estate outside the ordinary course of business, that same rule also authorizes a bankruptcy court to shorten this notice period “for cause shown.” Similarly, Fed. R. Bankr. P. 9006(c) gives a bankruptcy court authority to shorten a notice period “for cause shown.” “Cause” is determined by courts on a case by case basis, based on the particular facts of the case.

3. Here, ample cause exists to grant the request to shorten notice on the Emergency Motion. For several months, the Debtors have been engaged in negotiations regarding the sale of the remaining operations of the Debtors and Moll Ireland in Seagrove, North Carolina and Donegal, Ireland. While several purchasers initially expressed an interest in acquiring the Donegal facility, after conducting initial due diligence, the Purchaser was the only remaining party interested in the Donegal, facility. Thereafter, MEH entered into extensive arm’s-length negotiations with the Purchaser regarding the sale of the Donegal facility, either through an asset sale or the sale of the Stock.

4. As set forth more fully in the Emergency Motion, the Stock is a quickly wasting asset. Based on current projections, Moll Ireland may run out of cash by as early as June 9, 2010 and, without further vendor concessions, will almost certainly run out of cash by the end of June. Moreover, the Debtors do not have authority to use cash collateral to fund Moll Ireland pending the sale. Following the closing of the sale, the Debtors understand that the Purchaser will invest additional funds for the operation of Moll Ireland. However, the Debtors’ understand that the Purchaser will not invest additional money prior to the closing of the sale. Therefore, without an expedited sale of the Stock, Moll Ireland will likely have no option other than to shut down operations, padlock the doors to the facility, and conduct a fire sale liquidation of its assets. However, as discussed more fully in the Emergency Motion, the sale of the Stock provides

significantly more value to MEH than it can hope to receive through liquidation. Accordingly, the prompt sale of the stock presents the best opportunity to maximize the value of the Donegal facility for the benefit of MEH's estate.

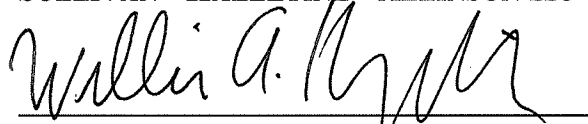
5. Based on the foregoing, the Debtors respectfully request that this Honorable Court enter an order scheduling a hearing on the Emergency Motion on or before June 11, 2010, with any objection to the Emergency Motion to be filed no later than Noon EDT two days prior to the hearing. Alternatively, if the Court is unable to schedule a hearing on the Emergency Motion or before June 11, 2010, the Debtors respectfully request that the Court schedule a hearing on the Emergency Motion for June 21, 2010 at 10:30 a.m., the next regularly scheduled omnibus hearing date in these chapter 11 cases, with an objection deadline of Noon EDT on June 16, 2010.

6. The Debtors will serve this Motion and the Emergency Motion by hand or overnight delivery on (i) the Office of the United States Trustee for the District of Delaware; (ii) counsel for NexBank, SSB as Administrative Agent and Collateral Agent for the Debtors' pre-petition secured lenders; (iii) counsel for the Official Committee of Unsecured Creditors; (iv) all persons known to assert an interest in the Stock; and (v) all parties that have requested special notice pursuant to Bankruptcy Rule 2002. Given the circumstances and the nature of the relief requested, the Debtors submitted that this notice is sufficient.

WHEREFORE, based on the foregoing, the Debtors respectfully request the entry of an order, in the form attached hereto, shortening the notice period on the Emergency Motion such that a hearing on the Emergency Motion be scheduled (i) not later than June 11, 2010, with any objection to the Emergency Motion to be filed no later than Noon EDT two days prior to the hearing or (ii) on June 21, 2010 at 10:30 a.m. EDT with an objection deadline of Noon EDT on June 16, 2010, and granting such other and further relief as this Court deems just and proper.

Dated: June 3, 2010
Wilmington, Delaware

SULLIVAN • HAZELTINE • ALLINSON LLC



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File a Motion: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 6/3/2010 at 2:23 PM EDT and filed on 6/3/2010

Case Name: Moll Industries, Inc.**Case Number:** 10-11371-MFW**Document Number:** 100**Docket Text:**Motion to Shorten *Notice* (related document(s)[99]) Filed by Moll Industries, Inc.. (Hazeltine, William)

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

Document description:Main Document**Original filename:**C:\fakepath\Mot to Shorten Sale - Emergency Motion Irish Stock.pdf**Electronic document Stamp:**[STAMP bkecfStamp_ID=983460418 [Date=6/3/2010] [FileNumber=8508888-0]
[874882ab2752c7eed1786df74dc63d98a767e247834cb3f62f20fdf0200786ae7b8e1
2b7ac354a3dbae2066a83a92b0bb576e87a5ecfb3c70169712efb0152b]]**10-11371-MFW Notice will be electronically mailed to:**Donald F. Baty on behalf of Creditor Aastrom Biosciences, Inc.
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