

**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
)	
)	Objection Deadline: June 14, 2010 at 4:00 p.m.
)	Hearing Date: June 21, 2010 at 10:30 a.m.

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT on June 1, 2010, the Debtors filed their attached *Motion of Debtors for an Order Granting Extension of Time to File Report Required by Bankruptcy Rule 2015.3* with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that any objections to the Motion 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 **June 14, 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, 5th Floor, Courtroom 4, on **June 21, 2010 at 10:30 a.m. prevailing Eastern time.**

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. 95
Date 6.1.10

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: June 1, 2010
Wilmington, Delaware

SULLIVAN · HAZELTINE · ALLINSON LLC

/s/ William A. Hazeltine

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

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**MOTION OF DEBTORS FOR AN ORDER GRANTING EXTENSION OF TIME
TO FILE REPORT REQUIRED BY BANKRUPTCY RULE 2015.3**

Moll Industries, Inc. and its affiliated debtors (the “Debtors”), the debtors and debtors-in-possession in the above-captioned Chapter 11 case, hereby move this Honorable Court (the “Motion”), pursuant to Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 9006-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), for an order extending the time in which the Debtors must file the report required by Bankruptcy Rule 2015.3. In support of this Motion, the Debtors state the following:

JURISDICTION

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The predicates for the relief sought herein are Bankruptcy Rule 9006(b)(1) and Local Rule 9006-2.

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).

BACKGROUND

2. 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 are being jointly administered for procedural purposes only. The Debtors are operating as debtors-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

3. 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.

4. The Donegal, Ireland facility is owned and operated by InteSys Ireland Limited ("InteSys"), a non-debtor corporation formed under the laws of the Ireland. Debtor Moll Europe Holdings, LLC ("MEH") owns 100% of the stock of InterSys.

5. The Debtors also own all of the equity interests in two defunct subsidiaries formed under the laws of Mexico. MEH and Moll Latin America Holdings, LLC ("MLAH") each own 50% of the stock of Moll Mexico Specialty, S. De. R. L. De C.V. (Moll Mexico Specialty"). MLAH owns 100% of the stock of Moll Mexico, S. De. R. L. De D.V. ("Moll Mexico").

RELIEF REQUESTED

6. Pursuant to Bankruptcy Rule 2015.3(a), a debtor is required to file periodic financial reports of the value, operations, and profitability of each entity in which the debtor

holds a substantial interest that is not a public traded corporation or a debtor under the Bankruptcy Code (the "Rule 2015.3 Report"). Accordingly, as the sole stockholder, MEH is required to file Rule 2015.3 Report with respect to InteSys, Moll Mexico Specialty and Moll Mexico.

7. Pursuant to Bankruptcy Rule 2015.3(b), the first Rule 2015.3 Report is supposed to be filed no later than five days before the Section 341 meeting of creditors. The Debtors' Section 341 meeting of creditors is scheduled for June 4, 2010. Accordingly, without an extension, MEH must file its Rule 2015.3 Report by May 28, 2010. By this Motion, the Debtors respectfully request that the Court extend this deadline to and including June 15, 2010, without prejudice to the Debtors' ability to request additional time should it become necessary.

BASIS FOR RELIEF REQUESTED

8. Bankrupt Rule 9006(b)(1) provides that a court may, for cause shown, enlarge the time to perform an act required by the Bankruptcy Rules. See Fed. R. Bankr. P. 9006(b)(1). Local Rule 9006-2 provides that, if a motion to take an action required by the Bankruptcy Rules is filed before the expiration of time required by the Bankruptcy Rules, the time is automatically extended until the Court acts on the motion, without the need for the entry of a bridge order. See Bankr. Del. L.R. 9006-2.

CAUSE EXISTS TO EXTEND THE TIME TO FILE THE SCHEDULES

9. The Debtors workforce has reduced substantially over recent months and their resources are strained. The Debtors' remaining employees are working diligently and expeditiously on the preparation their schedules and statements of financial affairs and satisfying other reporting requirements. However, there are competing demands on the Debtors' employees to assist in efforts to stabilize business operations during the initial post-petition

period and provide information requested by constituencies in these cases. Moreover, InteSys employees have been on holiday and, accordingly, have not been available to provide the information necessary to complete the Rule 2015.3. Based on the foregoing, the Debtors submit that cause exists to grant the requested extension.

NOTICE

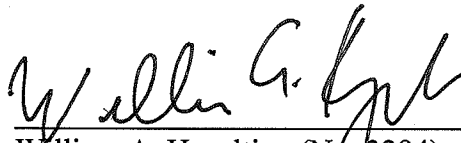
10. Notice of this Motion has been served on (i) the Office of the United States Trustee for the District of Delaware; (ii) Counsel for NexBank, SSB; (iii) Counsel to the Committee; and (iv) all parties that have requested special notice pursuant to Bankruptcy Rule 2002.

CONCLUSION

WHEREFORE the Debtors respectfully request entry of an order, substantially in the form annexed hereto as Exhibit A, granting the relief requested herein and such other and further relief as is just and proper.

Date: June 1, 2010
Wilmington, DE

SULLIVAN · HAZELTINE · ALLINSON LLC



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whazeltine@sha-llc.com

Attorneys for Debtors and Debtors-in-Possession

Exhibit A

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

**ORDER GRANTING MOTION OF DEBTORS FOR AN
ORDER GRANTING EXTENSION OF TIME
TO FILE REPORT REQUIRED BY BANKRUPTCY RULE 2015.3**

Upon the Motion² of the Debtors, pursuant to Bankruptcy Rule 9006(b)(1) and Local Rule 9006-2, for an order extending the time in which MEH must file its Rule 2015.3 Report with respect to InteSys; 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 after due deliberation, and finding good and sufficient cause for granting the relief requested in the Motion, it is hereby:

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is GRANTED in all respects.
2. The time in which MEH must file its initial Rule 2015.3 Report with respect to InteSys is extended to and including June 15, 2010, without prejudice to the Debtors' right to seek further extensions upon a showing of cause therefore.

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 Capitalized terms not otherwise defined herein shall have the meaning ascribed to such terms in the motion.

3. This Court shall retain jurisdiction over any and all matters arising from the interpretation or implementation of this Order.

Dated: June ____, 2010
Wilmington, Delaware

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: 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 6/1/2010 at 2:56 PM EDT and filed on 6/1/2010

Case Name: Moll Industries, Inc.**Case Number:** 10-11371-MFW**Document Number:** 95**Docket Text:**

Motion to Extend *Time to File Report Required by Bankruptcy Rule 2015.3* Filed by Moll Industries, Inc.. Hearing scheduled for 6/21/2010 at 10:30 AM at US Bankruptcy Court, 824 Market St., 5th Fl., Courtroom #4, Wilmington, Delaware. Objections due by 6/14/2010. (Hazeltine, William)

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

Document description:Main Document**Original filename:**C:\fakepath\Extension of Time to File 2015 Report.pdf**Electronic document Stamp:**

[STAMP bkecfStamp_ID=983460418 [Date=6/1/2010] [FileNumber=8501153-0]
[5cd23e46c0c10f5b68700a839aaeace36fc915bdb1b6d9ac0fd6da8da3d97a4a8b4e9
17071af193794133c064c307db6b444a75d8df279d96fcdf0354a9de6d1]]

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

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Mark L. Desgrosseilliers on behalf of Creditor Committee Official Committee of Unsecured Creditors
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William A. Hazeltine on behalf of Debtor Moll Europe Holdings, LLC
Bankruptcy001@sha-llc.com