

1 GARY E. KLAUSNER (STATE BAR NO. 69077)
2 MARGRETA M. MORGULAS (STATE BAR NO. 224950), and
3 MICHAEL S. NEUMEISTER (STATE BAR NO. 274220), Members of
4 **STUTMAN, TREISTER & GLATT**
5 **PROFESSIONAL CORPORATION**
6 1901 Avenue of the Stars, 12th Floor
7 Los Angeles, CA 90067
8 Telephone: (310) 228-5600
9 Telecopy: (310) 228-5788
10 Email: gklausner@stutman.com
11 mmorgulas@stutman.com
12 mneumeister@stutman.com

[Proposed] Reorganization Counsel
for Debtors and Debtors in Possession

9 Debtors' Mailing Address:
10 Colorep, Inc. and Transprint USA, Inc.
11 100 Pleasant Valley Road
12 Harrisonburg, VA 22801-9790
13 Attn: Robert Katz, [Proposed] CRO

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION**

14 In re) Case No. 13-bk-27689-WB
15)
16 COLOREP, INC.,) Chapter 11
17 a California corporation, *et al.*,) (Jointly Administered)
18)
19 Debtors.) **STIPULATION BETWEEN DEBTOR
20) AND COLUMBIA GAS OF VIRGINIA,
21) INC. TO CONTINUE HEARING ON
22) OBJECTION TO DEBTORS'
23) PROPOSED ADEQUATE ASSURANCE
24) OF PAYMENT FOR UTILITY SERVICE
25) PURSUANT TO 11 U.S.C. § 366(c)(3)
26) [DOCKET NO. 88]**

Current Hearing Date

Date: August 20, 2013
Time: 11:00 a.m.
Location: Courtroom 1475
255 East Temple Street
Los Angeles, CA 90012

Proposed Hearing Date

Date: August 28, 2013
Time: 10:00 a.m.
Location: Courtroom 1475
255 East Temple Street
Los Angeles, CA 90012

1 This stipulation (the "Stipulation") to continue the hearing on the *Objection of*
2 *Columbia Gas of Virginia, Inc. to Debtors' Proposed Adequate Assurance of Payment for Utility*
3 *Service Pursuant to 11 U.S.C. § 366(c)(3)* [Docket No. 88] (the "Objection") is made by and among
4 Colorep, Inc. and Transprint USA, Inc., the debtors and debtors in possession in the above-
5 captioned, jointly administered bankruptcy proceedings (the "Debtors"), and Columbia Gas of
6 Virginia, Inc. ("Columbia"). As used herein, the "Parties" shall refer to the Debtors and Columbia,
7 collectively.

8 **RECITALS**

9 A. On July 10, 2013, the Debtors commenced the above-captioned bankruptcy
10 proceedings by filing separate voluntary petitions under chapter 11 of the Bankruptcy Code.

11 B. On July 11, 2013, the Debtor filed the *Emergency Motion for Order: (I)*
12 *Deeming Utilities Adequately Assured of Future Performance; and (II) Establishing Procedures for*
13 *Determining Requests for Additional Assurance Pursuant to Bankruptcy Code Section 366* [Docket
14 No. 8] (the "Motion"), pursuant to which the Debtors sought an order, deeming the Debtors' utility
15 service providers adequately assured of future performance, and establishing procedures of
16 determining requests by utility providers for additional adequate assurance, pursuant to Bankruptcy
17 Code section 366.

18 C. On July 15, 2013, the Court held a hearing on the Motion. No parties in
19 interest appeared at the hearing to object to the relief requested in the Motion.

20 D. On July 18, 2013, the Court entered an order granting the relief requested in
21 the Motion [Docket No. 54] (the "Utility Order").

22 E. On August 1, 2013, Columbia filed its Objection to the Motion and Utility
23 Order. Among other things, Columbia has objected to the amount and form of adequate assurance
24 provided to it under the Utility Order, and to the Utility Order's provision that prevents the Debtors'
25 utility providers from terminating service postpetition without first obtaining an order from this
26 Court.

27 F. On August 8, 2013, Columbia filed a notice, stating that a hearing on the
28 Objection would be held on August 20, 2013 at 11:00 a.m., and that the Debtors' response to the

1 Objection must be filed by August 14, 2013 at 4:00 p.m., with Columbia's reply due by August 16,
2 2013 at 4:00 p.m.

3 G. The Parties have been engaged in earnest settlement discussions in an attempt
4 to resolve Columbia's objections to the Utility Motion and Utility Order. The Parties believe they
5 would benefit from additional time to continue settlement discussions, with the aim of resolving any
6 issues amicably so as to minimize the accrual of legal fees. So that the Parties have additional time
7 to further their communications, which may result in a resolution of the Objection, the Parties have
8 agreed to continue the hearing on the Objection.

9 **NOW, THEREFORE, IT IS HEREBY STIPULATED AS FOLLOWS:**

10 1. The hearing on the Objection shall be continued to August 28, 2013 at 10:00
11 a.m.

12 2. The undersigned represent and warrant that they have authority to enter into
13 this Stipulation on behalf of their respective Parties.

14 3. This Stipulation may be signed by facsimile or .pdf signature and in separate
15 counterparts which, when taken as a whole, shall constitute one and the same document.

16 4. The Bankruptcy Court shall retain exclusive jurisdiction to enforce the terms
17 of this Stipulation.

18 Date: August 13, 2013

/s/ Michael S. Neumeister
Gary E. Klausner
Margreta M. Morgulas
Michael S. Neumeister
STUTMAN, TREISTER & GLATT
PROFESSIONAL CORPORATION

[Proposed] Reorganization Counsel
for Debtors and Debtors in Possession

24 Date: August 13, 2013


Christopher O. Rivas
REED SMITH LLP

Counsel for Columbia Gas of Virginia, Inc.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 1901 Avenue of the Stars, 12th Floor, Los Angeles, California 90067. A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION BETWEEN DEBTOR AND COLUMBIA GAS OF VIRGINIA, INC. TO CONTINUE HEARING ON OBJECTION TO DEBTORS' PROPOSED ADEQUATE ASSURANCE OF PAYMENT FOR UTILITY SERVICE PURSUANT TO 11 U.S.C. § 366(c)(3) [DOCKET NO. 88]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) August 13, 2013, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) August 13, 2013, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Christopher O. Rivas
Reed Smith LLP
355 S. Grand Ave., Suite 2900
Los Angeles, CA 90071-1514

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL

(*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) August 13, 2013, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Honorable Julie W. Brand
U.S. Bankruptcy Court
255 E. Temple Street
Suite 1382 / Courtroom 1375
Los Angeles, CA 90012

Honorable Sheri Bluebond
United States Bankruptcy Court
255 E. Temple Street
Room 1482
Los Angeles, CA 90012

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 13, 2013
Date

Therese A. Barron
Printed Name

/s/ Therese A. Barron
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Brian L Davidoff on behalf of Creditor Quercus Trust
bdavidoff@greenbergglusker.com,
jreinglass@greenbergglusker.com;kwoodson@greenbergglusker.com;calendar@greenbergglusker.com;sgaeta@greenbergglusker.com

Patrick B Howell on behalf of Creditor Sensient Imaging Technologies S.A., Sensient Technologies Corporation
phowell@whdlaw.com, dprim@whdlaw.com;tmichalak@whdlaw.com

Ron Maroko on behalf of U.S. Trustee United States Trustee (LA)
ron.maroko@usdoj.gov

David W. Meadows on behalf of Creditor Virginia Electric And Power Co
david@davidwmeadowslaw.com

Stephan W Milo on behalf of Interested Party Courtesy NEF
smilo@wawlaw.com, psilling@wawlaw.com

Margreta M Morgulas on behalf of Debtor Colorep, Inc.
mmorgulas@stutman.com

Margreta M Morgulas on behalf of Debtor Transprint USA, Inc.
mmorgulas@stutman.com

Michael S Neumeister on behalf of Debtor Colorep, Inc.
mneumeister@stutman.com

Michael S Neumeister on behalf of Debtor Transprint USA, Inc.
mneumeister@stutman.com

Michael S Neumeister on behalf of Debtor In Possession Transprint USA, Inc.
mneumeister@stutman.com

Frank T Pepler on behalf of Creditor Meserole, LLC
frank.pepler@dlapiper.com

Danielle A Pham on behalf of Debtor Colorep, Inc.
dpham@stutman.com, daniellepham@gmail.com

Jeffrey M. Reisner on behalf of Interested Party Courtesy NEF
jreisner@irell.com

Christopher O Rivas on behalf of Creditor Columbia Gas of Virginia, Inc.
crivas@reedsmith.com

United States Trustee (LA)
ustpreion16.la.ecf@usdoj.gov