

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**  
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13 [Proposed] Reorganization Counsel  
14 for Debtors and Debtors in Possession

15 Debtors' Mailing Address:  
16 Colorep, Inc. and Transprint USA, Inc.  
17 100 Pleasant Valley Road  
18 Harrisonburg, VA 22801-9790  
19 Attn: Robert Katz, [Proposed] CRO

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

23 In re ) Case No. 13-bk-27689-WB  
24 )  
25 COLOREP, INC., ) Chapter 11  
26 a California corporation, *et al.*, ) (Jointly Administered)  
27 )  
28 Debtors. ) **STIPULATION BETWEEN DEBTOR**  
 ) **AND VIRGINIA ELECTRIC AND**  
 ) **POWER COMPANY d/b/a DOMINION**  
 ) **VIRGINIA POWER TO CONTINUE**  
 ) **HEARING ON OBJECTION TO THE**  
 ) **DEBTOR'S MOTION RE ADEQUATE**  
 ) **ASSURANCE UNDER 11 U.S.C. § 366**  
 ) **[DOCKET NO. 72]**

29 **Current Hearing Date**

30 Date: August 20, 2013  
31 Time: 11:00 a.m.  
32 Location: Courtroom 1475  
33 255 East Temple Street  
34 Los Angeles, CA 90012

35 **Proposed Hearing Date**

36 Date: August 28, 2013  
37 Time: 10:00 a.m.  
38 Location: Courtroom 1475  
39 255 East Temple Street  
40 Los Angeles, CA 90012

1 This stipulation (the "Stipulation") to continue the hearing on the *Objection of*  
2 *Virginia Electric and Power Company d/b/a Dominion Virginia Power to the Emergency Motion for*  
3 *Order: (I) Deeming Utilities Adequately Assured of Future Performance; and (II) Establishing*  
4 *Procedures for Determining Requests for Additional Assurance Pursuant to Bankruptcy Code*  
5 *Section 366* [Docket No. 72] (the "Objection") is made by and among Colorep, Inc. and Transprint  
6 USA, Inc., the debtors and debtors in possession in the above-captioned, jointly administered  
7 bankruptcy proceedings (the "Debtors"), and Virginia Electric and Power Company d/b/a Dominion  
8 Virginia Power ("Dominion"). As used herein, the "Parties" shall refer to the Debtors and  
9 Dominion, collectively.

#### 10 **RECITALS**

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

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

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

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

24 E. On July 26, 2013, Dominion filed an objection to the Motion and Utility  
25 Order. Among other things, Dominion has objected to the amount and form of adequate assurance  
26 provided to it under the Utility Order, and to the Utility Order's provision that prevents the Debtors'  
27 utility providers from terminating service postpetition without first obtaining an order from this  
28 Court.

1 F. On August 8, 2013, Dominion filed a notice, stating that a hearing on the  
2 Objection would be held on August 20, 2013 at 11:00 a.m., and that the Debtors' response to the  
3 Objection must be filed by August 14, 2013 at 4:00 p.m., with Dominion's reply due by August 16,  
4 2013 at 4:00 p.m.

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

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

12 1. The hearing on the Objection shall be continued to August 28, 2013 at 10:00  
13 a.m., or such later date as may be set by the Court.

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

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

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

20 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

21  
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24  
25  
26 Date: August 13, 2013

David W. Meadows  
David W. Meadows  
LAW OFFICES OF DAVID W. MEADOWS

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Russell R. Johnson III  
John M. Craig  
Law Firm of Russell R. Johnson III, PLC  
  
Counsel for Virginia Electric and Power  
Company d/b/a Dominion Virginia Power

## 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, 12<sup>th</sup> Floor, Los Angeles, California 90067. A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION BETWEEN DEBTOR AND VIRGINIA ELECTRIC AND POWER COMPANY d/b/a DOMINION VIRGINIA POWER TO CONTINUE HEARING ON OBJECTION TO THE DEBTOR'S MOTION RE ADEQUATE ASSURANCE UNDER 11 U.S.C. § 366 [DOCKET NO. 72]** 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.

David W. Meadows  
Law Offices of David W. Meadows  
1801 Century Park E, Suite 1235  
Los Angeles, CA 90067

Russell R. Johnson III  
John M. Craig  
Law Firm of Russell R. Johnson III, PLC  
2258 Wheatlands Drive  
Manakin-Sabot, VA 23103

**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.  
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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