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9 Counsel for Unsecured Creditors, *Synergy Partners USA, LLC and*  
10 *Michael Cohen*

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13 **UNITED STATES BANKRUPTCY COURT**  
14 **Central District of California**  
15 **Los Angeles Division**

16 In re:  
17  
18 COLOREP, INC.  
19 A California corporation, et al.,

20 Debtors,

21 Tax I.D. Nos. 94-3055026 (Colorep, Inc.) and  
22 54-1200496 (Transprint USA, Inc.)

Case No. 2:13-bk-27689-WB

Chapter 11

(Jointly Administered)

**DECLARATION OF MICHAEL COHEN IN  
SUPPORT OF MOTION OF SYNERGY  
PARTNERS USA, LLC AND MICHAEL  
COHEN FOR AN ORDER OF CONTEMPT  
AGAINST MESOROLE, LLC AND/OR  
FULLER SMITH CAPITAL MANAGEMENT,  
LLC FOR VIOLATIONS OF THE COURT'S  
ORDER**

Date: May 15, 2014

Time: 10:00 a.m.

Judge: Hon. Julia W. Brand

Crt. Rm.: 1375

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28 **DECLARATION OF MICHAEL COHEN**

1 I, Michael Cohen, declare under penalty of perjury pursuant to 28 U.S.C. §1746 as follows:

2 1. I am a sole proprietor whose business is to design and maintain websites. I am an  
3 unsecured and unpaid creditor of one or more of the Debtors in the bankruptcy case entitled *In Re*  
4 *Colorep, Inc., et al.* (Case No. 2:13-bk-27689-WB).

5 2. I have personal knowledge of the facts set forth herein and if called up to do so, I  
6 could and would competently testify thereto under oath.

7 3. I was retained by Transprint USA, Inc. ("Transprint") to perform the work set forth  
8 on Exhibit "B" to this declaration. I provided my services to Transprint in Transprint's ordinary  
9 course of business, both prior to Transprint's Petition for bankruptcy ("Petition") which was filed on  
10 July 10, 2013 and after the Petition date. The work that I undertook at the request of Transprint was  
11 for the benefit of Transprint and was agreed to by Transprint.  
12

13 4. Subsequent to the Petition date, Transprint retained my services to design and refine  
14 their website. My post-Petition work for Transprint took place between July 15, 2013 and August  
15 28, 2013. The total amount that I invoiced Transprint for my work was \$17,568.87. I received  
16 payments totaling \$9,025.98 (7/20/13 - \$2,500.00; 7/26/13 - \$3,500.00; 8/3/13 - \$2,500.00; 8/30/13 -  
17 \$525.98). Transprint owes a balance of \$8,542.89 to me. This balance remains unpaid as of the date  
18 of this declaration. Attached hereto as Exhibit "A" is a true and correct copy of my invoice to  
19 Transprint setting for the pre-Petition and post-Petition invoices and payments by and to me relating  
20 to Transprint.  
21

22 Executed this 21<sup>st</sup> day of April, 2014

23   
24  
25 Michael Cohen

# **EXHIBIT "A"**

**EXHIBIT "A"**

Customer  
Transprint USA  
1000 Pleasant Valley Rd  
Harrisonburg, VA 22801

INVOICE

Supplier  
Michael Cohen  
61 East 77th  
Apt 4E  
New York, NY 10075

Transprint USA Invoice# 0003  
Activity Date 7/15/2013 - 08/30/2013

Service Provided: Web Design

DATE	DESCRIPTION	AMOUNT	BALANCE
BILLINGS PREPETITION			
7/25/2013	Expenses 6/17/13-6/21/13*	\$ 191.64	\$ 191.64
7/25/2013	Expenses 6/24/13-6/28/13*	\$ 235.51	\$ 427.15
7/25/2013	Expenses 7/1/13-7/5/13*	\$ 39.88	\$ 467.03
7/25/2013	Expenses 6/3/13 Add*	\$ 208.00	\$ 675.03
BILLINGS POST PETITION			
7/20/2013	Svc Fees 7/15/13-7/19/13	\$ 2,500.00	\$ 2,500.00
7/25/2013	Expenses 7/22/13 -7/26/13	\$ 535.98	\$ 3,035.98
7/25/2013	Expenses 7/30/13 -8/1/13	\$ 1,631.01	\$ 4,666.99
7/27/2013	Svc Fees 7/22/13-7/26/13	\$ 2,500.00	\$ 7,166.99
8/3/2013	Svc Fees 7/29/13-8/2/13	\$ 2,500.00	\$ 9,666.99
8/10/2013	Svc Fees 8/5/13-8/9/13	\$ 2,500.00	\$ 12,166.99
8/17/2013	Svc Fees 8/12/13-8/16/13	\$ 2,500.00	\$ 14,666.99
8/22/2013	Expenses 8/5/13-8/9/13	\$ 901.88	\$ 15,568.87
8/23/2013	Svc Fees 8/19/13 - 8/20/13	\$ 1,000.00	\$ 16,568.87
8/30/2013	Svc Fees 8/26/13 - 8/28/13	\$ 1,000.00	\$ 17,568.87
PAYMENTS			
7/20/2013	Wire payment	\$ (2,500.00)	\$ 15,068.87
7/26/2013	Wire payment	\$ (3,500.00)	\$ 11,568.87
8/3/2013	Wire payment	\$ (2,500.00)	\$ 9,068.87
5/17/1905	Wire payment	\$ (525.98)	\$ 8,542.89

POST PETITION BALANCES DUE	
Post Petition 7/15-8/30/2013	\$ 8,542.89

GROSS PREPETITION BALANCES DUE	
Ref. doc. Invoice 0001	\$ 8,523.90
Invoice 0002	\$ 6,000.00
Invoice 0003	\$ 675.03
<b>Total</b>	<b>\$ 15,198.93</b>

Balance Due for Expenses and Services provided 20 days prior to Bankruptcy	
Ref. doc. Invoice 0002	\$ 6,000.00
Invoice 0003	\$ 467.03
<b>Total</b>	<b>\$ 6,467.03</b>

## **EXHIBIT "B"**

**EXHIBIT "B"**

**EXHIBIT "B"**

SCOPE OF WORK FOR TRANPRINT – POST-PETITION:

- Develop a communications strategy that ensured Transprint USA, Inc. ("Transprint") had a positive perception in Harrisonburg among locals, employees, local businesses, public affairs and the media.
- Research and work with executive team to develop new company messages that are strong, consistent and tailored for the audience whether it be suppliers, customers, employees or the media.
- Target media outlets that have reported unfavorably on Transprint during the last 18 months.
- Extend personal invitations for media to meet CEO, allowed supervised tours of Transprint
- Craft new companies messages and develop a consistent new voice for Transprint and CEO Mark Fox in preparation for local and trade media tours.
- Edit and overhaul digital platforms (websites) that represent the message and the way it looks and feels.
- Position website to increase sales

WORK COMPLETED – POST-PETITION:

- Fact finding mission - Research and identify ownership of company web domains that were not operated in-house at Transprint
- Secured website content
- Monitored web site crashes, fixed and reported to executives when sites were back to normal
- Developed creative direction of digital platforms
- Researched web platforms that would be cost effective for the transition
- Established temporary host for test site.
- Discussed with company executives to establish digital strategy moving forward and begin official digital consolidation
- Deconstruct, review and edit very section of websites.
- Established company-landing page
- Organized and shifted Airdye and Transprint content
- Launched initial redesign concept with new messaging, imagery and user friendliness
- Created specific home page sliders and visuals that subliminally directed visitor to areas of content that Transprint wanted to promote
- Edited navigation of website form the bar to click through in order to increase customer time spent on site
- Established basic analytics program to target what has been viewed and feed to sales team
- Safely secured Design library

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**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:

4333 Park Terrace Drive, Suite 205, Westlake Village, CA 91361

A true and correct copy of the foregoing document entitled (*specify*): **DECLARATION OF MICHAEL COHEN IN SUPPORT OF MOTION OF SYNERGY PARTNERS USA, LLC AND MICHAEL COHEN FOR AN ORDER OF CONTEMPT AGAINST MESOROLE, LLC AND/OR FULLER SMITH CAPITAL MANAGEMENT, LLC FOR VIOLATIONS OF THE COURT’S ORDER** 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*) April 24, 2014, 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*) April 24, 2014, 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.

Service information continued on attached page

**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*) \_\_\_\_\_, 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.

Service information continued on attached page

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

April 24, 2014  
*Date*

Haley Pinkston  
*Printed Name*

/s/ Haley Pinkston  
*Signature*

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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**SERVICE LIST:**

Served by US Mail:

Hon. Julia W. Brand  
United States Bankruptcy Court  
Central District of California  
Edward R. Roybal Federal Building and Courthouse  
255 E. Temple Street, Suite 1382 / Courtroom 1375  
Los Angeles, CA 90012

Mesorole, LLC  
Ari Hurt  
152 West 57th Street, 54th Floor  
New York, New York 10019

Fuller Smith Capital Management, LLC.  
Attn: Daniel J. Fuller  
23 Jefferson Road  
Princeton, New Jersey 08540

Served Electronically by Court's Notice of Electronic Filing ("NEF") System:

- **Melanie Scott Green** Melanie.green@usdoj.gov
- **Patrick B Howell** phowell@whdlaw.com, dprim@whdlaw.com;tmichalak@whdlaw.com
- **David W. Meadows** david@davidwmeadowslaw.com
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- **Christopher O Rivas** crivas@reedsmith.com
- **Nicola G Suglia** nsuglia@fleischerlaw.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.go