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

10  
11 **UNITED STATES BANKRUPTCY COURT**  
12 **Central District of California**  
13 **Los Angeles Division**

14 In re:  
15  
16 COLOREP, INC.  
17 A California corporation, et al.,

18 Debtors,

19 Tax I.D. Nos. 94-3055026 (Colorep, Inc.) and  
20 54-1200496 (Transprint USA, Inc.)

21 Case No. 2:13-bk-27689-JWB  
22 Chapter 11  
23 (Jointly Administered)

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28 **DECLARATION OF MICHAEL COHEN IN  
SUPPORT OF MOTION OF SYNERGY  
PARTNERS USA, LLC AND MICHAEL  
COHEN FOR AN ORDER: (1) ALLOWING  
ADMINISTRATIVE EXPENSE CLAIMS; AND  
(2) COMPELLING PURCHASERS TO PAY  
ADMINISTRATIVE CLAIMS, OR, IN THE  
ALTERNATIVE, REQUIRING ESBA TO  
DISGORGE PROFESSIONAL FEES FOR  
PAYMENT OF ADMINISTRATIVE EXPENSE  
CLAIMS**

Date: May 29, 2014  
Time: 10:00 a.m.  
Judge: Hon. Julia W. Brand  
Crt. Rm.: 1375

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**DECLARATION OF MICHAEL COHEN IN SUPPORT OF MOTION OF SYNERGY PARTNERS USA, LLC  
AND MICHAEL COHEN FOR AN ORDER: (1) ALLOWING ADMINISTRATIVE EXPENSE CLAIMS; AND  
(2) COMPELLING PURCHASERS TO PAY ADMINISTRATIVE CLAIMS, OR, IN THE ALTERNATIVE,  
REQUIRING ESBA TO DISGORGE PROFESSIONAL FEES FOR PAYMENT OF ADMINISTRATIVE  
EXPENSE CLAIMS**

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3 **DECLARATION OF MICHAEL COHEN**  
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5 I, Michael Cohen, declare under penalty of perjury pursuant to 28 U.S.C. §1746 as follows:

6 1. I am a sole proprietor whose business is to design and maintain websites. I am an  
7 unsecured and unpaid creditor of one or more of the Debtors in the bankruptcy case entitled *In Re*  
8 *Colorep, Inc., et al.* (Case No. 2:13-bk-27689-WB).  
9

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

12 3. I was retained by Transprint USA, Inc. ("Transprint") to perform the work set forth  
13 on Exhibit "B" to this declaration. I provided my services to Transprint in Transprint's ordinary  
14 course of business, both prior to Transprint's Petition for bankruptcy ("Petition") which was filed on  
15 July 10, 2013 and after the Petition date. The work that I undertook at the request of Transprint was  
16 for the benefit of Transprint and was agreed to by Transprint.  
17

18 4. Subsequent to the Petition date, Mark Fox, as the interim CEO of the Debtors,  
19 retained my services to design and refine their website. My post-Petition work for Transprint took  
20 place between July 15, 2013 and August 28, 2013. The total amount that I invoiced Transprint for  
21 my work was \$17,568.87. I received payments totaling \$9,025.98 (7/20/13 - \$2,500.00; 7/26/13 -  
22 \$3,500.00; 8/3/13 - \$2,500.00; 8/30/13 - \$525.98). Transprint owes a balance of \$8,542.89 to me.  
23 This balance remains unpaid as of the date of this declaration. Attached hereto as Exhibit "A" is a  
24 true and correct copy of my invoice to Transprint setting for the pre-Petition and post-Petition  
25  
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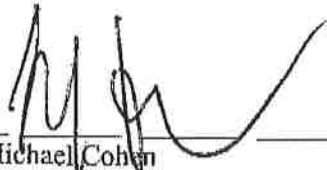
28 -2-

**DECLARATION OF MICHAEL COHEN IN SUPPORT OF MOTION OF SYNERGY PARTNERS USA, LLC  
AND MICHAEL COHEN FOR AN ORDER: (1) ALLOWING ADMINISTRATIVE EXPENSE CLAIMS; AND  
(2) COMPELLING PURCHASERS TO PAY ADMINISTRATIVE CLAIMS, OR, IN THE ALTERNATIVE,  
REQUIRING ESBA TO DISGORGE PROFESSIONAL FEES FOR PAYMENT OF ADMINISTRATIVE  
EXPENSE CLAIMS**

1 invoices and payments by and to me relating to Transprint. I have never received any  
2 communication that the \$8,542.89 owed to me by Debtors was disavowed by anyone.

3 5. I had no knowledge until very recently that my unpaid invoice in the amount of  
4 \$8,542.89 was not included in the administrative claims to be paid through the Debtors' estate or  
5 that Purchasers had not assumed my outstanding invoices as part of their assumed liabilities under  
6 the sale agreement. I also had no knowledge that my invoice was not included in any post-petition  
7 budget of the Debtors which, to the best of my knowledge, contained only general categories of  
8 budget amounts.  
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11 Executed this 27<sup>th</sup> day of May, 2014

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14 Michael Cohen

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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: (1) ALLOWING ADMINISTRATIVE EXPENSE CLAIMS; AND (2) COMPELLING PURCHASERS TO PAY ADMINISTRATIVE CLAIMS, OR, IN THE ALTERNATIVE, REQUIRING ESBA TO DISGORGE PROFESSIONAL FEES FOR PAYMENT OF ADMINISTRATIVE EXPENSE CLAIMS** 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*) **May 27, 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*) **May 27, 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.

May 27, 2014  
Date

Haley Pinkston  
Printed Name

/s/ Haley Pinkston  
Signature

SERVICE LIST

Served by Personal Delivery:

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

Served by US Mail:

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:

- **Martin J Brill** mjb@lnbrb.com
- **Daren Brinkman** office@brinkmanlaw.com
- **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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- **Jeffrey M. Reisner** jreisner@irell.com
- **Christopher O Rivas** crivas@reedsmith.com
- **Nicola G Suglia** nsuglia@fleischerlaw.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov