

1 GARY E. KLAUSNER (STATE BAR NO. 69077)  
MARGRETA M. MORGULAS (STATE BAR NO. 224950), and  
2 DANIELLE A. PHAM (STATE BAR NO. 269915), Members Of  
STUTMAN, TREISTER & GLATT  
3 PROFESSIONAL CORPORATION  
1901 Avenue of the Stars, 12th Floor  
4 Los Angeles, CA 90067  
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5 Telecopy: (310) 228-5788  
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6 mmorgulas@stutman.com  
kjarashow@stutman.com  
7

8 [Proposed] Reorganization Counsel  
for Debtors and Debtors in Possession

9 Debtors' Mailing Address:  
Colorep, Inc. and Transprint USA, Inc.  
10 1000 Pleasant Valley Road  
Harrisonburg, VA 22801-9790  
11

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

15 In re: ) Case No. 13-bk-27689-WB  
16 )  
COLOREP, INC., ) Chapter 11  
17 a California corporation, *et al.*, )  
18 Debtors. ) (Jointly Administered)  
19 ) **NOTICE OF APPLICATION FOR ORDER**  
20 ) **AUTHORIZING THE EMPLOYMENT**  
21 ) **AND RETENTION OF STUTMAN,**  
22 ) **TREISTER & GLATT, P.C., AS**  
23 ) **REORGANIZATION COUNSEL FOR THE**  
24 ) **DEBTORS AND DEBTORS IN**  
25 ) **POSSESSION**

26 Tax I.D. Nos. 94-3055026 (Colorep, Inc.) and )  
27 54-1200596 (Transprint USA, Inc.) )  
28 )

Hearing

*[No Hearing Required unless Requested  
under Local Bankruptcy Rule 9013-1(o)]*

1 **TO THE OFFICE OF THE UNITED STATES TRUSTEE, THE DEBTORS' SECURED**  
2 **CREDITORS, THE TWENTY LARGEST UNSECURED CREDITORS AND OTHER**  
3 **PARTIES IN INTEREST:**

4 **PLEASE TAKE NOTICE** that on July 18, 2013, the above-captioned debtors and  
5 debtors in possession (collectively, the "Debtors") applied (the "Application") to the United States  
6 Bankruptcy Court for the Central District of California (the "Court") for entry of an order, under  
7 sections 327(a) and 1107 of title 11 of the United States Code (the "Bankruptcy Code") and Rule  
8 2014(a) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 2014-1(b)  
9 of the Local Bankruptcy Rules (the "Local Rules"), authorizing the Debtors to employ Stutman,  
10 Treister & Glatt Professional Corporation ("ST&G") as its reorganization counsel as of the  
11 commencement of these cases. The Application was served on the parties set forth in Local Rule  
12 2014-1(b)(2)(A) as indicated in the service list appended to the Application.

13 **PLEASE TAKE FURTHER NOTICE** that, as set forth in the Application, ST&G  
14 has agreed to accept as compensation for its services in this case such sums as may be allowed by  
15 the Court in accordance with law, based upon the time spent and services rendered, the results  
16 achieved, the difficulties encountered, the complexities involved, and other appropriate factors.  
17 Subject to the Court's approval, ST&G will charge the Debtors for ST&G's services in accordance  
18 with its hourly rates in effect at the time services are rendered. A summary of (i) the range of the  
19 applicable current hourly rates for ST&G, and (ii) the hourly rates of those members and paralegals  
20 of ST&G expected to render substantial services to the Debtors, is attached as Exhibit 2 to the  
21 Declaration of Gary E. Klausner appended to the Application and is repeated as follows: Gary E.  
22 Klausner - \$860; Margreta M. Morgulas - \$695; Kizzy L. Jarashow - \$485; Danielle A. Pham -  
23 \$350; and Kendra A. Johnson - \$240.

24 **PLEASE TAKE FURTHER NOTICE** that, prior to the Petition Date, ST&G  
25 received a retainer, paid from the monies advanced to the Debtors by its pre-petition secured lender,  
26 in the amount of \$150,000 (the "Pre-Chapter 11 Retainer") for services rendered and expenses  
27 incurred prior to the filing of the Debtors' chapter 11 cases. Prior to the commencement of these  
28 Chapter 11 cases, ST&G drew down \$150,000 from the Pre-Chapter 11 Retainer for prepetition

1 services rendered to the Debtors. The Debtors do not owe ST&G any amount for prepetition  
2 services.

3 **PLEASE TAKE FURTHER NOTICE** that in addition to the Chapter 11 Retainer,  
4 ST&G also received, from funds advanced by the Debtors' pre-petition secured lender, \$10,000 to be  
5 held in trust and to be paid as a retainer to Debtors' corporate counsel if and when retained (the  
6 "Corporate Counsel Retainer") and \$25,000 to cover filing fees and other expenses incurred in  
7 connection with the Debtors' chapter 11 cases (the "Expense Retainer"). ST&G has deposited the  
8 Corporate Counsel Retainer and the Expense Retainer in the amount of \$35,000 in a segregated  
9 interest-bearing trust account. The Corporate Counsel Retainer shall only be used to in connection  
10 with the employment of corporate counsel, and the Expense Retainer shall only be used to pay costs  
11 and expenses related to these chapter 11 cases.

12 **PLEASE TAKE FURTHER NOTICE** that in June 2013, Quercus Trust, a  
13 shareholder of Colorep, Inc., advanced \$25,000 to ST&G prepetition (the "Quercus Retainer") to be  
14 used in connection with the preparation of the Debtors' chapter 11 cases. The Quercus Retainer was  
15 deposited in a ST&G trust account and was never drawn. The entire Quercus Retainer was returned  
16 to Quercus Trust prior to the Petition Date.

17 **PLEASE TAKE FURTHER NOTICE** that ST&G and the Debtor have agreed that  
18 ST&G shall be paid a post petition retainer in the amount of \$125,000 ("Post-petition Retainer"),  
19 which shall be funded from the first distribution under certain postpetition financing (the "DIP  
20 Loan"). ST&G shall deposit the Post-petition Retainer in a segregated trust account to secure the  
21 payment of ST&G's fees and expenses as allowed by this Court. The Debtors shall also grant a  
22 security interest therein. Thus, any order of this Court approving the employment of ST&G shall be  
23 conditioned on the approval of the Post-petition Retainer.

24 **PLEASE TAKE FURTHER NOTICE** that in the event the Court does not enter an  
25 interim order approving the requested DIP Loan, ST&G shall not be obligated to continue to  
26 represent the Debtors in these cases.

27 **PLEASE TAKE FURTHER NOTICE** that ST&G has agreed to accept as  
28 compensation for its services in these cases such sums as may be allowed by the Court in accordance

1 with law, based upon the time spent and services rendered, the results achieved, the difficulties  
2 encountered, the complexities involved, and other appropriate factors. No compensation will be paid  
3 by the Debtors to ST&G except as authorized by the Court.

4 **PLEASE TAKE FURTHER NOTICE** that if you would like to request another  
5 copy of the Application, please contact the undersigned counsel for the Debtors at the address,  
6 telephone number, or email address set forth above.

7 **PLEASE TAKE NOTICE that Local Bankruptcy Rule 9013-1(o)(1) requires**  
8 **that any response and request for hearing with respect to this Motion must be filed with the**  
9 **Court and served on the Debtors and the United States Trustee within 14 days after the**  
10 **date of service of this Notice.**

11  
12  
13 Date: July 18, 2013

Respectfully submitted,

14  
15 /s/ Danielle A. Pham  
16 GARY E. KLAUSNER,  
17 MARGRETA M. MORGULAS, and  
18 DANIELLE. A. PHAM, Members of  
19 STUTMAN, TREISTER & GLATT  
20 PROFESSIONAL CORPORATION  
21 [Proposed] Reorganization Counsel for  
22 Debtors and Debtors-in-possession  
23  
24  
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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:  
1901 Avenue of the Stars, 12<sup>th</sup> Floor, Los Angeles, CA 90067.

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF APPLICATION FOR ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF STUTMAN, TREISTER & GLATT, P.C., AS REORGANIZATION COUNSEL FOR THE DEBTORS AND DEBTORS IN POSSESSION**

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*) July 18, 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*) July 18, 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.

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*) July 18 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.

**Served by Federal Express**

Honorable Julia W. Brand  
United States Bankruptcy Court  
255 E. Temple Street, Courtroom 1375  
Los Angeles, California 90012

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.

7/18/13  
Date

Lisa Masse  
Printed Name

/s/ Lisa Masse  
Signature

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

**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

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

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

**2. SERVED BY UNITED STATES MAIL:**

Debtor: Colorep, Inc. c/o Law Offices of Joseph P. Bartlett 1900 Avenue of the Stars 20th Floor Los Angeles, CA 90067	Office of the US Trustee Ron Maroko , Esq. 725 S Figueroa St Ste 2600 Los Angeles, CA 90017 213-894-4520	<b>Secured Lenders</b>
Meserole, LLC Attn: Ari Hirt 152 W 57th Street, 4th Floor New York, New York 10019	Counsel to Meserole LLC DLA Piper LLP (US) Attn: Stuart Brown 919 North Market Street Suite 1500 Wilmington, Delaware 19801	<b>Parties Asserting a Secured Interest</b>
Debs Corporation 8F Honmachi Center Building 2-6-10 Honmachi Chuo-ku Osaka 541-0053 JAPAN	BDG (Larry Levy) 177 Riverside Drive Newport Beach, CA 92663	Cheran Digital Imaging & Consulting 798 Burnt Gin Road Gaffney, South Carolina 29340

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Cheran Digital Imaging & Consulting 1506 Old Georgia Hwy Gaffney, SC 29341	Counsel to Cheran Digital Imaging & Consulting Dillina W. Stickley Hoover Penrod PLC 342 South Main Street Harrisonburg, VA 22801	Danzas Corporation t/a DHL Global Forwarding 433B Carlisle Drive, Herndon, VA 20170
Counsel to Danzas Corporation David H. Gougher PC 7834 Forest Hill Avenue Richmond, VA 23225	Waste Management of Virginia 3580 S. Main Street Harrisonburg, VA 22801	Counsel to Waste Management of Virginia David H. Gougher PC 7834 Forest Hill Avenue Richmond, VA 23225
Fisher Textiles, Inc. 139 Business Park Drive Indian Trail, NC 28079	Vern & Mary Jane Michael LC 8218 Port Republic Rd Port Republic, VA 24471-2654	Counsel to Vern & Mary Jane Michael LC Litten & Sipe Attn: Melisa G. Michelsen, Esq. 410 Neff Avenue Harrisonburg, VA 22801
Roy Rolando 509 Wirt Avenue Elkton, VA 22827	Counsel to Roy Rolando Roland Santos 52 E Market Street Harrisonburg, VA 22801	Riddleberger Brothers 6127 S. Valley Pike Mt. Crawford, VA 22841
Counsel to Riddelberg Brothers Lenhart Obenshain 100 10th Street NE Suite 300 Charlottesville, VA 22902	Victoria Home Imp. LLC 3200 Honey Flower Ct Chesapeake, VA 23323-1952	Summit Financial Resources 2455 East ParleysWay, Salt Lake City, UT 84109
Faunus Group International, Inc. 80 Broad Street, 22 <sup>nd</sup> Floor New Yorkm NY 10004	David Gelbaum, Trustee Quercus Trust 1835 Newport Blvd, A109 - PMB 467 Costa Mesa, CA 92627	Counsel for Quercus Trust Brian Davidoff, Esq. Greenberg Glusker, et al. 1900 Avenue of the Stars, 21 <sup>st</sup> Floor Los Angeles, CA 90067
Dolly & Robert K. Raisler Foundation, Inc. 2600 Netherland Avenue, #520 Bronx, NY 10463 - 4857	David Grzan 2680 Silver View Drive Orono, MN 55356	Anne Rand 392 Rutland Avenue Teaneck, NJ 07666
Steven R. Jacobson 2600 Netherland Avenue, #520 Bronx, NY 10463	Sensient Imaging Technologies 777 East Wisconsin Avenue Milwaukee, WI 53202-5304	Valley Industrial Trucks 1152 Meadowbrook Ave. Youngstown, OH 44512
Valley Industrial Trucks (NMAC) 990 W 190th St Torrance, CA 90502-1014	Internal Revenue Service PO Box 145595 Cincinnati, OH 45250-5595	Kuehne & Nagel, Inc. Stephen Savarese, Esq. 10 Exchange Place Jersey City, NJ 07302
Counsel to Kuehne & Nagel, Inc. Halperin Battaglia Raicht, LLP Attn: Carrie E. Essensfeld 40 Wall Street, 37th Floor New York, NY 10005	Compressor Parts & Repairs 8256 Rising Creek Ln Broadway, VA 22815	Essex Temporary Service, Inc. 1501 Broadway New York, NY 10036

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Dougherty Equipment 591 Belle Circle Harrisonburg, VA 22801	Geno's Coffee LLC 253 Bookerdale Rd Waynesboro, VA 22980	Pitney Bowes Credit Corp 27 Waterview Dr Shelton, CT 06484-4301
SIK Associates Kaufman Management Company, LLC Attn: Steven J. Kaufman 450 Seventh Avenue New York, New York 10123	Stork Prints America 3201 N 1-85 Charlotte, NC 28269	Silvious, Peggy R. 623 Gypsy Ln, Elkton, VA, 22827
Silvious, Peggy R. 995 Floyd Cir, Mc Gaheysville, VA, 22840	Robert Fellows 1176 Portland Dr Harrisonburg, VA 22801-8627	Deborah Wagner 5048 Scotts Ford Road Mount Crawford, VA 22841
<b>20 Largest Creditors</b>	Anthem Blue Cross Blue Shield Attn: Dianne Loving P.O. Box 580494 Charlotte, NC 28258	Domtar Corporation Port Huron Mill 1700 Washington Avenue Port Huron, Michigan 48060
Domtar Corporation Subsidiary Of Domtar Ind 1700 Washington Avenue Port Huron, MI 48060	Dominion Va Power Attn: Barbara Smith P.O. Box 26666 Richmond, VA 23261-6666	Dominion Virginia Power P.O. Box 26019 Richmond, VA 23260-6019
Krausz Puente LLC c/o The Krausz Companies 44 Montgomery St, Ste 3300 San Francisco, CA 94104	Krausz Puente LLC 11383 Newport Dr Rancho Cucamonga, CA 91730-5536	Stonefield Josephson, Inc. Attn: Steve Rapattoni, CPA 5 Park Plaza, Suite 700 Irvine, CA 92614
Susan D'Arcy aka SRD International 95 East Broadway Roslyn, NY 11576	Mimaki USA, Inc. c/o Wiliam Hearnburg, Jr. Smith, Gambrell & Russell, LLP Promenade, Suite 3100 1230 Peachtree Street N.E. Atlanta, GA 30309	Mimaki USA, Inc. Dept. CH 17368 Palatine, IL 6055-7368
Bonnie Julian 1244 Pole Branch Rd Clover, SC 29710	L.H. Charney Associates, LLC Attn: Bruce Block 1441 Broadway New York, New York 10018	Counsel to L.H. Charney Associates, LLC Attn: Scott S. Markowitz Tarter Krinsky & Drogin LLP 1350 Broadway New York, NY 10018
Fish & Associates Attn: Mei Tsang 2603 Main Street Suite 10000 Irvine, CA 92614-4271	Fedex – Techconnect Attn: Pam Gish Lockbox 360353 500 Ross St. Rm 154-0455 Pittsburg, PA 15252	Federal Express Corp. PO Box 371461 Pittsburgh, PA 15250-7461
Stand Energy Corporation Attn Kathy Kellems, Credit Manager 1077 Celestial St Suite 110 Cincinnati, OH 45202	Stand Energy Corporation PO Box 632712 Pittsburgh, PA 15250-7461	Carlo Tenconi Via Stromboli 209 Milan 20144 ITALY

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Atlantic Paper Company 430 Feheley Drive King of Prussia, PA 19406	Univar USA, Inc. Attn: Doug Putney 1001 Old Bermuda Hundred Rd Chester, VA 23836	Univar USA, Inc. P. O. Box 409692 Atlanta, GA 30384-9692
PBMares /PBGH Attn: Mary Aldrich 558 South Main Street Harrisonburg, VA 22801	Columbia Gas GTS Account P.O. Box 742529 Cincinnati, OH 45274-2529	Chemsolv, Inc. P.O. Box 13847 Roanoke, VA 24037
Dupont Company Attn: Jenna Pike 1007 Market Street Wilmington, DE 19898	Dupont Company Cashier's Office D-8003-3 1007 Market Street Wilmington, DE 19898	Shelter Capital Partners fka Yazam LLC Attn: Rodney Friedman 10880 Wilshire Blvd., Suite 1850 Los Angeles, CA 90024 Attn: Rodney Friedman
Nexeo Solutions 3 Waterway Square Place Suite 1000 The Woodlands, Texas 7738	Nexeo Solutions LLC 62190 Collections Center Dr Chicago, IL 60693-0621	<b>Other Parties in Interest</b>
<b><u>Served by Certified Mail</u></b> Union Bank of California Attn: Jose Duenes 1980 Saturn St. Monterey Park, CA 91755	<b><u>Served Via Certified Mail</u></b> Wells Fargo Bank N.A. 141 East Market Street Harrisonburg, VA 22801	<b>Governmental Agencies</b>
Internal Revenue Service PO Box 7346 Philadelphia, PA 19101-7346	Employment Development Department Bankruptcy Group MIC 92E PO Box 826880 Sacramento, CA 94280-0001	State of California Franchise Tax Board Bankruptcy Section, MS: A-340 PO Box 2952 Sacramento, CA 95812-2952

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