

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

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.) **NOTICE OF APPLICATION FOR**
) **ORDER AUTHORIZING THE**
) **EMPLOYMENT AND RETENTION OF**
 Tax I.D. Nos. 94-3055026 (Colorep, Inc.) and) **STUBBS, ALDERTON & MARKILES,**
 54-1200596 (Transprint USA, Inc.)) **LLP AS SPECIAL CORPORATE**
) **COUNSEL**

29 Hearing

30 [No Hearing Requires Unless Requested
31 Under Local Bankruptcy Rule 9013-1(o)]

1 **TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE, THE OFFICE OF THE**
2 **UNITED STATES TRUSTEE, THE DEBTORS' TWENTY LARGEST UNSECURED**
3 **CREDITORS, AND OTHER PARTIES ENTITLED TO NOTICE:**

4 **PLEASE TAKE NOTICE** that on July 31, 2013, Colorep, Inc. and Transprint USA,
5 Inc., the debtors and debtors in possession in the above-captioned bankruptcy proceedings (the
6 "Debtors"), filed with the Court and submitted to the Office of the United States Trustee (the "UST")
7 the *Application for Order Authorizing the Employment and Retention of Stubbs, Alderton &*
8 *Markiles, LLP as Special Corporate Counsel* (the "Application") pursuant to sections 327(e) and
9 1107 of the Bankruptcy Code, Federal Rule of Bankruptcy Procedure 2014(a) (the "Bankruptcy
10 Rules"), and Rule 2014-1(b) of the Local Bankruptcy Rules for the United States Bankruptcy Court
11 Central District of California (the "Local Rules").

12 **PLEASE TAKE FURTHER NOTICE** that the Application requests this Court enter
13 an order authorizing the Debtors to employ Stubbs, Alderton & Markiles, LLP ("Stubbs") as their
14 special corporate counsel as of July 25, 2013. As special counsel, Stubbs would provide Debtors
15 with professional legal services in connection with: (a) providing general corporate advice to the
16 Debtors and their boards of directors, including any special committees formed, related to
17 governance and operations; (b) attending any board of director or special committee meetings, as
18 requested by the Debtors; (c) analyzing and drafting agreements required in connection with the sale
19 of the Debtors' assets, including making sure that any subject transactions conform with applicable
20 nonbankruptcy law; and (d) preparing contracts or agreements related to the governance or
21 operations of the Debtors. Stubbs will not be responsible for matters of bankruptcy law, including
22 representation of the Debtors in these chapter 11 cases, as the Debtors have already retained
23 Stutman, Treister & Glatt Professional Corporation as their reorganization counsel for such
24 purposes.

25 **PLEASE TAKE FURTHER NOTICE** that during the one year period prior to the
26 commencement of these cases, Stubbs received no compensation from the Debtors for prepetition
27 services rendered on the Debtors' behalf. On July 15, 2013, Stubbs received a \$10,000 postpetition
28 retainer from the Debtors to secure the payment of a portion of Stubbs' fees and expenses (the

1 "Chapter 11 Retainer"). The Chapter 11 Retainer was funded from the distribution made by
2 Meserole, LLC under the postpetition financing approved on an interim basis by the Court on July
3 18, 2013 [Docket No. 56]. The Debtors intend for Stubbs' fees and costs to be paid, in part, by
4 having Stubbs draw down on the remaining Chapter 11 Retainer on a monthly basis pursuant to
5 Section I.B. of the "Guide to Applications for Retainers, and Professional and Insider
6 Compensation," issued by the UST. As of the filing of this Application, the Chapter 11 Retainer
7 represents the Debtors' only available funds to compensate Stubbs for its services in these cases. If,
8 after the Chapter 11 Retainer is exhausted, a mutually satisfactory agreement cannot be reached
9 between the Debtors and Stubbs as to the payment of Stubbs' ongoing fees and expenses, then
10 Stubbs shall be permitted to withdraw from its representation of the Debtors in these bankruptcy
11 cases.

12 **PLEASE TAKE FURTHER NOTICE** that subject to the Court's approval, Stubbs
13 will charge the Debtors' estates for its services in accordance with its ordinary and customary rates in
14 effect at the time services are rendered. A summary of (i) the range of applicable current hourly
15 rates for Stubbs, and (ii) the hourly rates of those members of Stubbs expected to render substantial
16 services to the Debtors, is attached as Exhibit "2" to the Declaration of Jonathan R. Hodes appended
17 to the Application and is repeated as follows: Jonathan Hodes, \$625; Joseph Stubbs, \$625; Jason
18 Lee, \$435. The Debtors are proposing that Stubbs be compensated pursuant to section 330 of the
19 Bankruptcy Code.

20 **PLEASE TAKE FURTHER NOTICE** that a copy of the Application is available by
21 request to Michael S. Neumeister, either by (a) mail to Stutman, Treister & Glatt, P.C., Attention:
22 Michael S. Neumeister, 1901 Avenue of the Stars, 12th Floor, Los Angeles, California, 90067; (b) by
23 email to mneumeister@stutman.com; or (c) by telephonic request at (310) 228-5680.

24 **PLEASE TAKE FURTHER NOTICE** that any response to, and/or request for a
25 hearing on, the Application must conform with Local Bankruptcy Rules 2014-1(b)(5) and
26 9013-1(f)(1), and must be filed with the Court no later than 14 days from the date of service of this
27 notice on: (1) the Debtors' proposed reorganization counsel, Stutman, Treister & Glatt, P.C., Attn:
28

1 Michael S. Neumeister, 1901 Avenue of the Stars, 12th Floor, Los Angeles, California, 90067; and
2 (2) the UST.

3 **PLEASE TAKE FURTHER NOTICE** that Local Bankruptcy Rule 9013-1(h)
4 provides that the failure to timely file and serve required papers may be deemed by the Court to be
5 consent to the granting of the relief requested in the Application.

6
7 Dated: July 31, 2013

Respectfully submitted,

8 /s/ Michael S. Neumeister

9 GARY E. KLAUSNER
10 MARGRETA M. MORGULAS
11 MICHAEL S. NEUMEISTER
12 **STUTMAN, TREISTER & GLATT**
13 **PROFESSIONAL CORPORATION**

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[Proposed] Reorganization Counsel
for Debtors and Debtors in Possession

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*): **NOTICE OF APPLICATION FOR ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF STUBBS, ALDERTON & MARKILES, LLP AS SPECIAL CORPORATE COUNSEL** 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 31, 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 31, 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 31, 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.

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.

<u>July 31, 2013</u> Date	<u>Therese A. Barron</u> Printed Name	<u>/s/ Therese A. Barron</u> Signature
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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

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

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

United States Trustee (LA)
ustpregion16.la.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL:

Colorep, Inc.
Employment Appl. Service List
6400.000
575388v1

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

Secured Lenders

Meserole, LLC
Attn: Ari Hirt
152 W 57th Street, 4th Floor
New York, NY 10019

Counsel to Meserole LLC
DLA Piper LLP (US)
Attn: Stuart Brown
919 North Market Street, Suite 1500
Wilmington, DE 19801

20 Largest Creditors

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, MI 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, NY 10018

Counsel to L.H. Charney Assocs.
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

Atlantic Paper Company
430 Fehely 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

Nexeo Solutions
3 Waterway Square Place
Suite 1000
The Woodlands, TX 77380

Nexeo Solutions LLC
62190 Collections Center Dr
Chicago, IL 60693-0621

Governmental Agencies

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346