

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</p> <p>Caption in Compliance with D.N.J. LBR 9004-1(b)</p> <p>Kyriaki Christodoulou CULLEN AND DYKMAN LLP One Battery Park Plaza, 34th Floor New York, New York 10004 T: (212) 701-4170 F: (212) 742-1219 kchristodoulou@cullenllp.com</p> <p>and</p> <p>Russell R. Johnson III John M. Craig Law Firm of Russell R. Johnson III, PLC 2258 Wheatlands Drive Manakin-Sabot, Virginia 23103 T: (804) 749-8861 russell@russelljohnsonlawfirm.com john@russelljohnsonlawfirm.com</p> <p><i>Co-Counsel for Commonwealth Edison Company, PECO Energy Company, Virginia Electric and Power Company d/b/a Dominion Energy Virginia, Southern California Edison Company, Metropolitan Edison Company and Pennsylvania Electric Company</i></p>	
<p>In re:</p> <p>MULTI-COLOR CORPORATION, <i>et al.</i>,</p> <p>Debtors.</p>	<p>Chapter 11</p> <p>Case No. 26-10910 (MBK)</p> <p>(Jointly Administered)</p>

JOINDER OF METROPOLITAN EDISON COMPANY AND PENNSYLVANIA ELECTRIC COMPANY TO THE OBJECTION OF CERTAIN UTILITY COMPANIES TO THE DEBTORS' MOTION FOR ENTRY OF INTERIM AND FINAL ORDERS (I) APPROVING THE DEBTORS' PROPOSED ADEQUATE ASSURANCE OF PAYMENT FOR FUTURE UTILITY SERVICES, (II) PROHIBITING UTILITY PROVIDERS FROM ALTERING, REFUSING, OR DISCONTINUING SERVICES, (III) APPROVING THE DEBTORS' PROPOSED PROCEDURES FOR RESOLVING ADEQUATE ASSURANCE REQUESTS, AND (IV) GRANTING RELATED RELIEF

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Metropolitan Edison Company (“Met-Ed”) and Pennsylvania Electric Company (“Penelec”) (collectively, the “Joinder Utilities”), by counsel, hereby join in the *Objection of Certain Utility Companies To the Debtors’ Motion For Entry of Interim and Final Orders (I) Approving the Debtors’ Proposed Adequate Assurance of Payment For Future Utility Services, (II) Prohibiting Utility Providers From Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors’ Proposed Procedures For Resolving Adequate Assurance Requests, and (IV) Granting Related Relief* (the “Objection”), and set forth the following:

Introduction

1. The Joinder Utilities adopt and incorporate by reference herein the *Introduction* section set forth in the Objection.

Facts

2. The Joinder Utilities adopt and incorporate by reference herein the *Facts* section set forth in the Objection.

3. The Utility Providers List attached at Exhibit “C” to the Utility Motion (Docket No. 7) reflects that the that the Bank Account will contain the following amounts on behalf of the Joinder Utilities: (a) Met-Ed - \$4,750; and (b) Penelec - \$8,450.

Facts Regarding the Utilities Section

4. The Joinder Utilities adopt and incorporate by reference herein the *Facts Regarding the Utilities* section set forth in the Objection because the billing and payment terms set forth in that section are essentially the same as to the Joinder Utilities.

5. In order to avoid the need to bring witnesses and have lengthy testimony regarding the Joinder Utilities’ regulated billing cycles, the Joinder Utilities request that this Court, pursuant to Rule 201 of the Federal Rules of Evidence, take judicial notice of their billing

cycles. Pursuant to the foregoing request and based on the voluminous size of the applicable documents, the Joinder Utilities are providing the web site links to the following tariffs and/or state laws, regulations and/or ordinances:

Met-Ed and Penelec:

https://www.firstenergycorp.com/content/customer/customer_choice/pennsylvania/pennsylvania_tariffs.html

6. Subject to a reservation of the Joinder Utilities’ right to supplement their post-petition deposit requests if additional accounts belonging to the Debtors are subsequently identified, the Joinder Utilities’ estimated prepetition debt and post-petition deposit requests are as follows:

<u>Utility</u>	<u>No. of Accts.</u>	<u>Est. Prepetition Debt</u>	<u>Deposit Request</u>
Met-Ed	1	\$11,529.86	\$18,266 (2-month)
Penelec	1	\$18,713.34	\$21,882 (2-month)

7. Penlec held a prepetition deposit in the amount of \$12,296 that it recouped against the prepetition debt owing to Penelec from the Debtors pursuant to Section 366(c)(4) of the Bankruptcy Code. No prepetition deposit amount remains after recoupment.

Discussion

8. The Joinder Utilities incorporate and adopt by reference the legal and factual arguments set forth in the Objection.

WHEREFORE, the Joinder Utilities respectfully request that this Court enter an order:

1. Denying the Utility Motion as to the Joinder Utilities;
2. Awarding the Joinder Utilities the post-petition adequate assurance of payments pursuant to Section 366 in the amount and form satisfactory to the Joinder Utilities, which is the form and amounts requested herein;

3. Vacating paragraph 6.e. of the Interim Utility Order as to the Joinder Utilities that contains the Injunctive Relief Provision; and
4. Providing such other and further relief as the Court deems just and appropriate.

Dated: February 18, 2026

Respectfully Submitted,

/s/ Kyriaki Christodoulou
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