

UNITED STATES DEPARTMENT OF JUSTICE  
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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

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In re: : Chapter 11  
: :  
: Case No. 26-10910 (MBK)  
Multi-Color Corporation, et al.,<sup>1</sup> :  
: The Honorable Michael B. Kaplan  
Debtors. :  
: Hearing Date: April 7, 2026, at 10:00 a.m.  
: :  
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**OBJECTION OF THE UNITED STATES TRUSTEE TO DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER (I) DISBANDING THE COMMITTEE OR IN THE ALTERNATIVE, (II) (A) DIRECTING THE U.S. TRUSTEE TO RECONSTITUTE THE COMMITTEE AND (B) GRANTING CASE PROTECTIONS**

Andrew R. Vara, the United States Trustee for Regions Three and Nine (the "U.S. Trustee"), through his undersigned counsel, objects to the *Debtors' Emergency Motion for Entry of an Order (I) Disbanding the Committee or in the Alternative, (II) (A) Directing the U.S. Trustee to Reconstitute the Committee and (B) Granting Case Protections* [D.I. 553] (the "Motion"),<sup>2</sup> and respectfully states as follows:

<sup>1</sup> The last four digits of Debtor Multi-Color Corporation's tax identification number are 5853. A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://www.veritaglobal.net/MCC>. The location of the Debtors' service address in these chapter 11 cases is: 3284 Northside Parkway NW, Suite 400, Atlanta, Georgia 30327.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion, as applicable.



**PRELIMINARY STATEMENT**

1. The Debtors request that the Court enter an order disbanding the Committee, or in the alternative, directing the U.S. Trustee to reconstitute the Committee by removing Shenkman Capital Management, Inc.,<sup>3</sup> and imposing a professional fee cap on the committee's professionals but not the debtor's, euphemistically calling them "case protections." But there is no statutory authority for this Court to disband the Committee because its appointment is mandated under section 1102(a)(1) of the Code—which states that the U.S. Trustee "shall appoint a committee of creditors holding unsecured claims"—and thus imposes a statutory duty on the U.S. Trustee to appoint a committee of unsecured creditors as long as there are eligible creditors willing to serve. The U.S. Trustee respectfully submits that the facts of this case are distinguishable from the very unique circumstances in *In re LTL Mgmt., LLC*, 636 B.R. 610 (Bankr. D. N.J. 2022), where this Court held that it had the power to review the U.S. Trustee's committee appointments under an abuse of discretion standard. If, however, this Court nonetheless decides that it has authority to review the U.S. Trustee's appointment, the appointment of the Committee is not an abuse of discretion because the U.S. Trustee appointed eligible unsecured creditors to the Committee as soon as practicable under the circumstances of these cases, pursuant to the statutory requirement to do so.

2. Debtors primarily justify their Motion with the conclusory assertion that the Unsecured Notes Members possess conflicts that render them unable to discharge their fiduciary obligations. Notwithstanding that the Debtors provided no evidence that the Unsecured Notes Members will act to the detriment of the unsecured creditor body as a whole, such assertions are not a basis to disband the Committee. Such concerns are more appropriately considered in the

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<sup>3</sup> This portion of the requested relief has been rendered moot because the U.S. Trustee has reconstituted the Committee to remove Shenkman Capital Management, Inc. *See* D.I. 688.

context of the Debtors' alternative request for relief requesting that the Court direct the U.S. Trustee to reconstitute the Committee pursuant to 11 U.S.C. 1102(a)(4).

3. Accordingly, and for the reasons set forth in more detail herein, the U.S. Trustee respectfully requests that the Court enter an order denying the Motion.

### **JURISDICTION AND STANDING**

4. This Court has jurisdiction to hear and determine the Motion and this objection pursuant to: (i) 28 U.S.C. § 1334; (ii) applicable orders of the United States District Court of the District of New Jersey issued pursuant to 28 U.S.C. § 157(a); and (iii) 28 U.S.C. § 157(b)(2).

5. Pursuant to 28 U.S.C. § 586, the U.S. Trustee is charged with overseeing the administration of chapter 11 cases filed in this judicial district. This duty is part of the U.S. Trustee's overarching responsibility to enforce the bankruptcy laws as written by Congress and interpreted by the Courts. *See Morgenstern v. Revco D.S., Inc. (In re Revco D.S., Inc.)*, 898 F.2d 498, 500 (6th Cir. 1990) (describing the U.S. Trustee as a "watchdog").

6. The U.S. Trustee has standing to be heard concerning the Motion and this objection pursuant to 11 U.S.C. § 307. *See U.S. Tr. v. Columbia Gas Sys., Inc. (In re Columbia Gas Sys., Inc.)*, 33 F.3d 294, 295-96 (3d Cir. 1994) (noting that U.S. Trustee has "public interest standing" under section 307, which goes beyond mere pecuniary interest).

### **BACKGROUND**

#### **The Chapter 11 Cases**

7. On January 29, 2026 (the "Petition Date"), the above-captioned debtors (the "Debtors") filed chapter 11 petitions in this Court.

8. On the Petition Date, the Debtors filed their *Joint Prepackaged Chapter 11 Plan of Reorganization of Multi-Color Corporation and Its Debtor Affiliates*, D.I. 18 (the "Plan"), and the

*Disclosure Statement Relating to the Joint Prepackaged Chapter 11 Plan of Reorganization.* D.I. 17.

9. On February 2, 2026, the Court entered an order approving the solicitation procedures and setting the confirmation hearing for March 17, 2026. D.I. 97. The confirmation hearing was adjourned by the Court to March 31, 2026, and then further adjourned to April 13, 2026. D.I. 378 & D.I. 672.

### **Motions to Dismiss or Transfer Venue**

10. On January 30, 2026, the Cross-Holder Ad Hoc Group filed a motion to dismiss or transfer the case for improper venue. D.I. 71. On February 17, 2026, the U.S. Trustee filed a motion to dismiss or transfer for improper venue. D.I. 266.

11. On March 18, 2026, the Court entered an order denying the motions to dismiss or transfer for the reasons set forth in the letter opinion dated March 16, 2026. D.I. 458 & D.I. 494.

### **Committee Appointment**

12. On March 18, 2026, the U.S. Trustee appointed an official committee of unsecured creditors (the "Committee"). D.I. 493.

13. The U.S. Trustee appointed three members to the Committee: UMB Bank, N.A., in its capacity as Successor Indenture Trustee; Shenkman Capital Management, Inc.; and James Castillo. *See Id.*

14. On March 25, 2026, the Debtors filed the Motion, along with a motion requesting shortened notice. The Court scheduled the Motion for hearing on April 7, 2026. D.I. 571.

15. On April 2, 2026, the U.S. Trustee reconstituted the Committee to remove Shenkman Capital Management, Inc. D.I. 688.

## OBJECTION

### **I. The Statutory Framework: Section 1102 Confers Important, But Different, Authority on Bankruptcy Courts and United States Trustees with Respect to Official Committees.**

16. Section 1102(a) of the Bankruptcy Code governs the formation, appointment, and modification of official committees. It provides under what circumstances the bankruptcy court and U.S. Trustee may act and under what standards they may act.

17. Section 1102(a)(1) provides that the U.S. Trustee "shall appoint" a committee of creditors holding unsecured claims in virtually all cases (if there are eligible creditors willing to serve) "as soon as practicable after the order for relief[.]" 11 U.S.C. § 1102(a)(1). That language is mandatory, and the U.S. Trustee must appoint a committee of unsecured creditors unless such a committee cannot be appointed because of lack of interest or eligible and suitable candidates. The U.S. Trustee also monitors committee membership and modifies their composition, as appropriate. 11 U.S.C. § 1102(a)(1) and (2).

18. Section 1102 also confers important, but different, authority on the Court with respect to official committees. The Court may, if requested, order the U.S. Trustee to:

- Appoint additional committees if necessary to assure adequate representation, 11 U.S.C. § 1102(a)(2);
- Change committee membership if necessary to ensure adequate representation, 11 U.S.C. § 1102(a)(4);
- Order that a committee be appointed in a small business or sub-chapter V case if the Court finds cause for doing so, 11 U.S.C. § 1102(a)(3); or
- Increase committee membership to include a creditor that is a small business concern, 11 U.S.C. § 1102(a)(4).

19. "Those are the only powers over committees the Code gives the court. There are no others." *In re Caesars Entm't Operating Co.*, 526 B.R. 265, 268 (Bankr. N.D. Ill. 2015). *But*

*see In LTL Mgmt., LLC*, 636 B.R. at 620-21 (Bankr. D. N.J. 2022) (holding that bankruptcy court possesses authority pursuant to 11 U.S.C. § 105 to review U.S. Trustee's appointment of a reconstituted committee and additional committee for abuse of discretion).

20. The relative and delineated roles for the courts and the U.S. Trustee in committee matters under section 1102 are no accident. Part of the impetus for the comprehensive revamping of the bankruptcy system in the 1986 amendments was Congress's desire to bifurcate judicial from administrative functions and screen courts from administrative functions that could raise conflict of interest issues. *See In re Victory Markets, Inc.*, 196 B.R. 1, 3-4 (Bankr. N.D.N.Y. 1995); *see also In re ShoreBank Corp.*, 467 B.R. 156, 160 (Bankr. N.D. Ill. 2012) (discussing the historical development of the role of bankruptcy courts and U.S. Trustees regarding committee membership).

After the adoption of the Code in 1978, Congress recognized that requiring courts to appoint creditors' committees was an administrative burden which should be shifted entirely to the U.S. Trustee. It also became apparent that by shifting the responsibility of appointing creditors' committees to the U.S. Trustee, Congress could avoid any questions as to the court's neutrality in the bankruptcy process when deciding disputes between its hand-picked committee and other parties in interest.

*Victory Markets*, 196 B.R. at 3-4 (citations omitted).

21. Between 1978 and 1986, the power to appoint and modify a committee rested with the bankruptcy courts (except in those districts participating in the U.S. Trustee pilot program).

*Victory Markets, Inc.*, 196 B.R. at 3. But the 1986 amendments withdrew the authority of bankruptcy courts (in districts other than those in North Carolina and Alabama) to appoint or modify committees and vested that authority in the U.S. Trustee:

[T]he 1986 Act repealed Code § 1102(c) which had expressly granted courts the authority to add to and delete from the creditors' committee. The U.S. Trustee, pursuant to the 1986 Act, was endowed with the authority to appoint a creditors committee and the courts were relieved of their authority to affect the composition of the same upon a finding of inadequate representation.

*Id.* at 4 (citation omitted).

22. Section 1102(a)(4), added in 2005 as part of BAPCPA, granted courts express authority for the first time since 1986 to review committee membership and order its modification upon the "request of a party in interest and after notice and a hearing." Thus, the caselaw regarding authority over committee matters must be understood in the context of the statute at the time of decision because of the amendments to section 1102 over time that changed the division of authority over committees between the courts and the United States Trustees.

## **II. The Bankruptcy Court Lacks Statutory Authority Under Section 1102(a) to Disband the Committee.**

23. Here, the Debtors request that this Court disband the Committee. Although the Court has important authority under section 1102 with respect to committees, the Court does not have authority to disband a mandatory committee of unsecured creditors appointed by the U.S. Trustee pursuant to 11 U.S.C. § 1102(a)(1).

24. Debtors rely on *In re LTL Mgmt., LLC*, 636 B.R. 610 (Bankr. D. N.J. 2022) for the proposition that the Court possesses the authority pursuant to 11 U.S.C. § 105(a) to review the U.S. Trustee's appointment of the Committee for abuse of discretion. Motion, ¶ 29. But the Court in *LTL Mgmt.* did not disband the mandatory unsecured creditors committee, as the Debtors seek here. Moreover, *LTL Mgmt.* also does not support Debtors' Motion to disband the Committee because that case involved the review of the U.S. Trustee's appointment of a discretionary, additional committee, not a mandatory one. The facts of this case are very different from the unique circumstances present in *LTL Mgmt.* In *LTL Mgmt.*, this Court disbanded two committees appointed by the U.S. Trustee after the case was transferred from North Carolina, where the U.S. Trustee does not operate, to New Jersey—a reconstituted mandatory committee and an additional committee—and reinstated the original committee appointed by the North Carolina bankruptcy

court. In so doing, this Court found that the U.S. Trustee should have more appropriately sought relief from the order of the North Carolina bankruptcy court appointing the original committee because its appointment order was "law of the case."

25. In this case, the appointment of this Committee is mandatory under 11 U.S.C. 1102 § (a)(1), and the Committee should be permitted to continue in its statutory role. (Contrast 11 U.S.C. §§ 1102(a)(1) (U.S. Trustee "*shall* appoint a committee of creditors holding unsecured claims" with 11 U.S.C. § 1102(a)(1) (U.S. Trustee "*may* appoint additional committees of creditors or of equity security holders") (emphasis added)).

26. Although the U.S. Trustee respectfully disagrees with the conclusion reached by the Court in *LTL Mgmt.*,<sup>4</sup> if this Court determines that it has authority to disband the Committee, the appointment should be reviewed under the deferential abuse of discretion standard. *See LTL Mgmt.*, 636 B.R. 623 ("Put simply, the actions and decision of the U.S. Trustee are entitled to

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<sup>4</sup> The U.S. Trustee takes the position that the proper approach is that identified by bankruptcy courts that have held that section 1102(a) does not authorize an official committee to be disbanded. Although the Court may order the U.S. Trustee to change the membership of an official committee to assure adequate representation under section 1102(a)(4), it may not veto the U.S. Trustee's decision under section 1102(a)(1) to appoint an official committee. Simply put, "section 1102(a) does not authorize the court to disband [an official committee.]" *Caesars*, 526 B.R. at 269; *In re New Life Fellowship, Inc.*, 202 B.R. 994, 996 (Bankr. W.D. Okla. 1996) (finding "the specific language . . . of section 1102(a)(1) compel[s] the conclusion that the court . . . is without power to abolish the committee").

"Because section 1102(a) grants specific powers to the Court, and because the power to disband a committee is not one of them, the only fair reading of the statute is that there is no such power." *Caesars*, 526 B.R. at 268 (bankruptcy court concluded that it had no authority to disband an official, additional committee under a plain reading of section 1102). As discussed in *Caesars*, analyzing a court's authority to disband an official committee appointed under section 1102(a)(1) entails a straightforward application of the interpretive doctrine *expressio unius est exclusio alterius*-the expression of one thing is the exclusion of another. *Id.* at 268-69 (citing *POM Wonderful LLC v. Coca-Cola Co.*, 573 U.S. 102, 114 (2014)). When a statute expressly grants courts the authority to take certain actions, that express grant implies the prohibition of other actions. The statute expressly grants courts specific but limited authority under section 1102(a)(4) to order certain changes to a committee appointed under section 1102(a)(1), but provides courts with no specific authority to disband such a committee. Simply put, "Section 105(a) . . . is not a vehicle for reading into section 1102(a)(1) a power to do away with statutory committees when section 1102(a)(1) itself grants no such power - and especially when section 1102(a)(1) grants other powers but not that one." *In re Caesar Entm't, Operating Co.*, 526 B.R. at 269. Section 105 cannot confer authority to impose extra-statutory remedies or to take actions directly contradicting express provisions of the Code.

deference."). Here, the U.S. Trustee has not abused his discretion in appointing the Committee. By appointing eligible unsecured creditors to the Committee as soon as practicable under the circumstances of this case, the U.S. Trustee acted in accordance with section 1102(a)(1), which states that the U.S. Trustee "shall appoint a committee of creditors holding unsecured claims."

27. In any event, aside from complaints about the timing of the appointment, the primary reason the Debtors justify disbanding the Committee is their conclusory assertion that the Unsecured Notes Members possess conflicts that render them unable to discharge their fiduciary obligations. Notwithstanding that the Debtors have provided no evidence that the Unsecured Notes Members will act to the detriment of the unsecured creditor body as a whole, such an argument does not constitute a basis to disband the Committee. Such concerns are more appropriately considered in the context of a request to reconstitute the Committee pursuant to 11 U.S.C. 1102(a)(4), which the U.S. Trustee addresses in further detail below.

28. The additional cases cited by the Debtors do not support that the Committee should be disbanded. The Debtors cite *In re City of Detroit*, 519 B.R. 673, 681-82 (Bankr. E.D. Mich. 2014), but that case arose under chapter 9 of the Code where the court determined that section 1102(a)(1) does not apply because of the language that the committee shall be appointed "after the order for relief *under chapter 11* of this title." (emphasis added).<sup>5</sup> It is undisputed that section 1102(a)(1) applies here.

29. The Debtors' reliance on *Bodenstein v. Lentz (In re Mercury Fin. Corp.)*, 240 B.R. 270 (N.D. Ill. 1999) is also misplaced. *Mercury Finance* arose out of a challenge to committee

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<sup>5</sup> The United States Trustee also maintains that *City of Detroit* was wrongly decided for several reasons, including that 11 U.S.C. § 901(a) states that section 1102 shall "apply in a case under this chapter." Moreover, in some circumstances, section 901(a) listed only subparts of other sections that apply in chapter 9, e.g., sections 347(b), 350(b), and 506(a)(2), demonstrating that Congress was very specific in identifying whether an entire section or only its subparts would apply in chapter 9.

composition and was decided in 1999 during a time of uncertainty—and a different statutory regime than the current one—engendered by the repeal of former section 1102(c). *See* 240 B.R. at 275-76. Without an express statutory role for courts to address "committee composition" and "adequate representation," the *Mercury Finance* court determined that section 105(a) could be used to dissolve a combined committee of creditors and equity holders and order the appointment of two separate committees. 240 B.R. at 277. The court determined that section 1102(a) only allowed the U.S. Trustee to appoint "eligible individuals" to a committee, necessitating the appointment of equity holders and unsecured creditors to separate committees. *Id.* at 277-80; see also 11 U.S.C. § 1102(a)(1) ("[T]he United States trustee shall appoint a committee of creditors holding unsecured claims and may appoint additional committees of creditors or equity security holders as the United States trustee deems appropriate."). Thus, in reality, the decision does not support a court's authority to disband a committee; rather, it ordered that the committee be reconstituted to ensure adequate representation. Regardless of whether any statutory void existed at that time, Congress subsequently clarified the scope of the court's ability to order that committee composition be altered when it enacted section 1102(a)(4).

30. Likewise, *In re Pacific Avenue, LLC*, 467 B.R. 868 (Bankr. W.D.N.C. 2012), does not support disbandment of the Committee. *Pacific Avenue* was a North Carolina case, and all committee actions are left to the court's discretion in North Carolina. 467 B.R. 868. Indeed, the Bankruptcy Administrator (part of the federal judiciary) in *Pacific Avenue* supported disbanding the committee, as a chapter 11 trustee had been appointed and was liquidating the estate. *Id.* at 870.

31. In *In re Continental Cast Stone, LLC*, 625 B.R. 203 (Bankr. D. Kan. 2020), the U.S. Trustee appointed the same two-member committee in each of two jointly administered cases,

even though the members were only creditors in one of the cases. *Id.* at 206. Debtors claimed that the U.S. Trustee violated section 1102(a)(1)'s mandate when it appointed creditors that did not hold unsecured claims against one of the debtors. The court wrongly relied on section 105's equitable powers to order that the committee be disbanded without mentioning or discussing section 105's narrow limits as held by the Supreme Court in *Law v. Siegel*, 571 U.S. 415 (2014). In *Siegel*, the Court ruled, as a matter of "hornbook law," that bankruptcy courts may not use their equitable powers under section 105 to override specific provisions of the Bankruptcy Code. *Id.* at 421. But that is exactly what the *Continental Cast* court did when it exceeded its statutory authority under section 1102 by relying on section 105.<sup>6</sup>

**III. The Debtors Have Not Established a Basis to Reconstitute the Committee Pursuant to 11 U.S.C. § 1102(a)(4).<sup>7</sup>**

32. Section 1102(a)(4) provides that "[o]n request of a party in interest and after notice and a hearing, the court may order the United States trustee to change the membership of a committee appointed under this subsection, if the court determines that the change is necessary to ensure adequate representation..." 11 U.S.C. 1102(a)(4)

33. In their request for alternative relief, the Debtors allege that the reconstitution of the Committee is warranted because of alleged conflicts on the part of the Unsecured Notes Members. The Debtors argue, without support, that the Unsecured Notes Members will pursue only their own interests. However, it is not unusual for a committee to represent constituencies of

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<sup>6</sup> *Continental Cast* was also wrongly decided for another reason. Appointing a committee for each jointly administered debtor in most cases to ensure that only creditors of one debtor (or conversely all of the debtors) serve would be highly inefficient and monstrously expensive. In this case, that would mean the U.S. Trustee likely should have appointed 56 different committees or close thereto. As this Court is aware, the U.S. Trustee typically appoints one committee even in large, complex cases and never more than two.

<sup>7</sup> While the U.S. Trustee believes the Debtors' alternative request for relief has been rendered moot by the U.S. Trustee's reconstitution of the Committee on April 2, 2026, the U.S. Trustee addresses the substantive arguments for completeness of the record.

varying and sometimes opposing interests. Indeed, a "committee is a catalyst for negotiation and compromise between the parties in the reorganization process." *In re Enron Corp.*, 279 B.R. 671, 690 (Bankr. S.D.N.Y. 2002). Conflicts are "inherent in any committee," and "the mere presence of conflicts . . . is insufficient to show a lack of adequate representation." *In re ShoreBank Corp.*, 467 B.R. 156, 161 (Bankr. N.D. Ill. 2012) (citing *In re Garden Ridge Corp.*, 2005 WL 523129, at \*4 (Bankr. D. Del. March 2, 2005)).

34. Moreover, committee members have fiduciary duties to represent fairly all such interests: "Courts recognize, as well, that committee members have fiduciary obligations to the other creditors, obligations that constrain what might otherwise be permissible, self-interested behavior." *Id.* (citing *In re Nationwide Sports Distribs.*, 227 B.R. 455, 463-64 (Bankr. E.D.Pa. 1998)). As a result, a conflict among committee members results in a lack of adequate representation only when the member breaches or will imminently breach its fiduciary duty or when extreme conflict prevents the committee from functioning effectively. *Id.* at \*4, \*8.

35. More than mere speculation of a conflict is required to justify modification of a committee. "Before a conflict of interest necessitates reconstitution of a committee, then, there must be specific evidence that the committee member or members with the conflict have breached or are likely to breach their fiduciary duties." *ShoreBank*, 467 B.R. at 161. "[M]ere speculation that a committee member's conflict of interest might one day ripen into an outright breach of fiduciary duty and a lack of adequate representation is not enough to warrant reconstituting a committee." *Id.* at 164 (collecting cases).

36. Here, the Debtors simply do not like that the Committee was formed or its membership. A desire to limit administrative expenses is not justification or authority for disbanding the Committee. If the Debtors' argument were adopted by the Court, it would directly

contravene the Bankruptcy Code, which imposes on the U.S. Trustee the statutory duty to appoint a committee.

37. However, the U.S. Trustee does recognize the Debtors' concerns about increased administrative costs in the form of professional fees. The Committee's professionals, like all retained professionals, have the obligation to comply with section 330 of the Bankruptcy Code. Should any professional, including the Debtors, perform tasks that are neither reasonable nor necessary, the parties may and should object to the professionals' fees when presented for approval. The Court has authority over fee applications pursuant to section 330 of the Bankruptcy Code to ensure that all compensation is reasonable and necessary.

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**CONCLUSION**

WHEREFORE, the U.S. Trustee respectfully asks that this Court deny the Motion and grant such other relief as the Court deems fair and just.

Dated: April 2, 2026  
Newark, New Jersey

Respectfully submitted,

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