Docket #0009 Date Filed: 2/26/2026

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

GREENBERG TRAURIG, LLP
Alan J. Brody, Esq.
500 Campus Drive, Suite 400
Florham Park, New Jersey 07932
Telephone: (973) 443-3543

-and-

CAHILL GORDON & REINDEL LLP
Joel Moss, Esq.
David G. Januszewski, Esq. (to be admitted *pro hac vice*)
Jordan Wishnew, Esq.
Jason M. Hall, Esq. (to be admitted *pro hac vice*)
32 Old Slip
New York, NY 10005
Telephone: (212) 701-3000

Co-counsel for Defendant Barclays Bank PLC

In re: MULTI-COLOR CORPORATION, *et al.*, Debtors.[1]	Chapter 11 Case No.: 26-10910 (MBK)
BTG Pactual Asset Management US, LLC, BTG Pactual Absolute Return Master Fund, L.P., Canyon Capital Advisors LLC, The Canyon Value Realization Master Fund, L.P., River Canyon Fund Management LLC, River Canyon Total Return Bond Fund, Owl Creek Asset Management, L.P., Owl Creek Credit Opportunities Master Fund, L.P., Shenkman Opportunistic Credit Master Fund LP, Third Point LLC, and Third Point Master Fund LP	Adv. Pro. No.: 26-01041 (MBK)

[1] 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' proposed claims and noticing agent at https://www.veritaglobal.net/MCC. The location of the Debtors' service address for purposes of these Chapter 11 Cases is: 3284 Northside Parkway NW, Suite 400, Atlanta, Georgia 30327.

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Plaintiffs v. Barclays Bank PLC Defendant.

APPLICATION FOR THE *PRO HAC VICE* ADMISSION OF DAVID JANUSZEWSKI, ESQ.

Barclays Bank PLC, (the "**Defendant**"), by and through its undersigned co-counsel, Greenberg Traurig, LLP, respectfully makes this application (the "**Application**"), for *pro hac vice* admission of David Januszewski and represents as follows:

1. On January 29, 2026, the above-captioned debtors and debtors-in-possession (the "**Debtors**"), filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, as amended (the "**Chapter 11 Cases**") in the United States Bankruptcy Court for the District of New Jersey.

2. On February 14, 2026, the above-captioned Plaintiffs filed the instant adversarial proceeding (the "**Adversary Proceeding**") seeking declaratory relief under 28 U.S.C. § 2201(a), 11 U.S.C. § 105(a), and Bankruptcy Rules 3012(b), 7001(b), and 7009(i).

3. Mr. Januszewski is a partner of the firm Cahill Gordon & Reindel LLP, which maintains an office at 32 Old Slip, New York, NY 10005. Because of his familiarity with the facts and circumstances relevant to the Debtors in the within matter, the Defendant requests that Mr. Januszewski be allowed to appear *pro hac vice* for the purposes of representing the Defendant in the Adversary Proceeding.

4. As set forth in the accompanying Declaration of David Januszewski, Esq., Mr. Januszewski is a member in good standing of the bars of the State of Connecticut, the State of

Massachusetts (retired), the New York State Appellate Division (Second Department), the United States District Court for the District of Connecticut, the United States District Court for the Northern District of Florida, the United States District Court for the Eastern District of Michigan, the United States District Court for the Eastern District of New York, the United States District Court for the Southern District of New York, the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the Third Circuit, the United States Court of Appeals for the Fifth Circuit, the United States Court of Appeals for the Tenth Circuit, the United States Court of Appeals for the Eleventh Circuit, and the United States Supreme Court. Mr. Januszewski is not under suspension or disbarment by any court.

5. If admitted *pro hac vice*, Mr. Januszewski has represented that he will adhere to the disciplinary jurisdiction of this Court. Mr. Januszewski has also represented that he will arrange with the New Jersey Lawyer's Fund for Client Protection for payment of the applicable annual fee under New Jersey Court Rule 1:28-2(a) and shall pay the fee required by L. Civ. R. 101.1(c)(3) for *pro hac vice* admission to this Court.

WHEREFORE, it is respectfully requested that the Court grant this Application, pursuant to D.N.J. LBR 9010-1 and L. Civ. R. 101.1(c), to admit David Januszewski, Esq. *pro hac vice* in the above captioned matter.

Dated: February 26, 2026

Respectfully submitted,

/s/ Alan J. Brody

Alan J. Brody, Esq.
GREENBERG TRAURIG, LLP
500 Campus Drive
Florham Park, New Jersey 07932
Telephone: (973) 443-3543
Email: brodya@gtlaw.com

Co-Counsel for Defendant Barclays Bank PLC

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Plaintiffs v. Barclays Bank PLC Defendant.

DECLARATION OF DAVID JANUSZEWSKI, ESQ. IN SUPPORT OF APPLICATION FOR *PRO HAC VICE* ADMISSION

DAVID JANUSZEWSKI, ESQ., of full age, hereby certifies as follows:

1. I am an attorney-at-law and a partner of the firm Cahill Gordon & Reindel LLP, which maintains an office at 32 Old Slip, New York, NY 10005. Because of my familiarity with the facts and circumstances relevant to the above-captioned adversarial proceeding, Barclays Bank PLC, (the "**Defendant**"), requests that I be allowed to appear *pro hac vice* for the purposes of representing Defendant in connection with the above-captioned Adversary Proceeding. I submit this Certification in support of the application for my admission pro hac vice.

2. I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing of the bars of the State of Connecticut, the State of Massachusetts (retired), the New York State Appellate Division (Second Department), the United States District Court for the District of Connecticut, the United States District Court for the Northern District of Florida, the United States District Court for the Eastern District of Michigan, the United States District Court for the Eastern District of New York, the United States District Court for the Southern District of New York, the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the Third Circuit, the United States Court of Appeals for the Fifth Circuit, the United States Court of Appeals for the Tenth Circuit, the United States Court of Appeals for the Eleventh Circuit, and the United States Supreme Court. I am in good standing before the courts in which I

am admitted, and I have not been disbarred, suspended, or disciplined by any court or administrative body.

3. If the Application is granted, I agree to abide by this Court's local rules, to submit myself to the disciplinary jurisdiction of this Court, and to make payment to the New Jersey Lawyer's Fund for Client Protection as provided in New Jersey Court Rule 1:28-2(a) and to the District Court under L. Civ. R. 101.1(c)(3).

4. For the foregoing reasons, I respectfully request my application for admission *pro hac vice* be granted.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: February 26, 2026

/s/ David Januszewski

David Januszewski

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Case No.: 26-10910 (MBK)

Adv. No.: 26-01041 (MBK)

Chapter: 11

Judge: Michael B. Kaplan

ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page is **ORDERED**.

This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that David Januszewski, Esq. be permitted to appear pro hac vice; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may sign and file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders. Unless otherwise permitted by the Court, local counsel must attend all hearings and proceedings before the Court, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the $250.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, N.J. 07102
Attention: Pro Hac Vice Admissions

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.

rev.03/01/2024