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April 14, 2026

VIA CM/ECF
Honorable Zahid N. Quraishi
United States District Court – District of New Jersey
Clarkson F. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *Cross Holder Ad Hoc Group v. Multi-Color Corp.*, Civ Action No. 3:26-CV-03540

Request for Temporary Stay of Deadline to File Opposition to the Cross-Holder Ad Hoc Group and Excluded First Lien Lenders' *Joint Motion for Leave to Appeal Order Denying Motion to Dismiss or, in the Alternative, Transfer the Chapter 11 Cases*

Dear Judge Quraishi,

I write on behalf of Appellee Multi-Color Corporation ("MCC") to respectfully request that the Court temporarily stay the deadline to oppose the Cross-Holder Ad Hoc Group and Excluded First Lien Lenders' (collectively, "Appellants") *Joint Motion for Leave to Appeal Order Denying Motion to Dismiss or, in the Alternative, Transfer the Chapter 11 Cases* [Dkt. 1] ("Joint Motion for Leave to Appeal"). Appellants consent to the temporary stay.

As the Court is aware, the Appellants filed a joint motion for leave to appeal the Bankruptcy Court's March 18, 2026 Order denying the *Cross-Holder Ad Hoc Group's Motion to Dismiss or, in the Alternative, Transfer the Chapter 11 Cases. See In re Multi-Color Corp.*, No. 26-10910 (Bankr. D.N.J.) at Dkts. 494, 71-1. Oppositions to that motion are currently due tomorrow, April 15, 2026.

Since the filing of the Joint Motion for Leave to Appeal, MCC, Appellants, and other parties in interest, including CD&R and the Secured Ad Hoc Group,[1] have been engaged in ongoing negotiations regarding a global Plan Settlement. Those negotiations have been productive.

[1] CD&R and the Secured Ad Hoc Group also opposed Appellants' venue motions before the Bankruptcy Court. *See* Joint Motion for Leave to Appeal ¶ 22.

Accordingly, to allow the parties time to finalize their agreement and prevent the parties from expending resources on further briefing that may be rendered moot by consensual resolution of the underlying dispute, MCC respectfully requests that the Court enter an order staying the deadline for MCC and such other parties in interest to oppose Appellants' Joint Motion for Leave to Appeal, with such stay to be lifted in the event that the parties are unable to execute the settlement stipulation. MCC submits that good cause exists as finalizing the settlement will resolve the matters at issue in the Joint Motion for Leave to Appeal and conserve the resources of both the parties and the Court. Again, Appellants consent to the temporary stay.

We ask that Your Honor please enter "So Ordered" below. We thank the Court for consideration of this request

Very truly yours,

/s/ Michael D. Sirota

Michael D. Sirota

Cc: All Counsel of Record via CM/ECF

It is SO ORDERED as of this ___ day of _____, 2026

_____
Hon. Zahid N. Quraishi, U.S. D.J.