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Counsel for the Cross-Holder Ad Hoc Group

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: MULTI-COLOR CORPORATION, *et al.*, Debtor.[1]	Chapter 11 Sat below: Hon. Michael B. Kaplan Case No. 26-10910 (MBK)
CROSS-HOLDER AD HOC GROUP and EXCLUDED FIRST LIEN LENDERS, Appellants, v. MULTI-COLOR CORPORATION, Appellee.	Appeal from the Bankruptcy Court for the District of New Jersey Hon. Zahid N. Quraishi Civil No. 3:26-cv-03691-ZNQ

NOTICE OF MOTION FOR AN ORDER
ADMITTING BRUCE BENNETT TO APPEAR *PRO HAC VICE*

TO: PARTIES ON THE COURT'S ELECTRONIC MAIL NOTICE LIST

PLEASE TAKE NOTICE that on May 4, 2026, at 10:00 a.m. or as soon thereafter as counsel may be heard, the Cross-Holder Ad Hoc Group ("Appellant") shall apply, pursuant to Local Civil Rule 101.1(c), before the Honorable Judge Zahid N. Quraishi, United States District Court for the District of New Jersey, at the

[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' claims and noticing agent at https://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.

Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Room 4W, Trenton, NJ 08608, for entry of an Order admitting Bruce Bennett, of the law firm Jones Day, co-counsel for Appellant in this proceeding, *pro hac vice* on behalf of Appellant in the pending matter.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Appellant will rely upon the declarations of Paul R. DeFilippo and Bruce Bennett submitted herewith.

PLEASE TAKE FURTHER NOTICE that Appellant does not request the opportunity to present oral argument in support of this Motion.

PLEASE TAKE FURTHER NOTICE that a proposed order granting the relief requested is submitted herewith.

Dated: April 10, 2026

Respectfully submitted,

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo
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DECLARATION OF PAUL R. DeFILIPPO
IN SUPPORT OF MOTION FOR AN ORDER
ADMITTING BRUCE BENNETT TO APPEAR *PRO HAC VICE*

I, Paul R. DeFilippo, of full age, hereby declare as follows:

1. I am a partner with the law firm of Wollmuth Maher & Deutsch LLP, 500 Fifth Avenue, New York, New York 10110.

[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' claims and noticing agent at https://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.

2. I have been a member in good standing of the bar of the State of New Jersey since 1978 and a member in good standing of the bar of the United States District Court for the District of New Jersey since 1978.

3. I make this Declaration in support of the application of Bruce Bennett to practice before this court *pro hac vice* in accordance with L. Civ. R. 101.1(c). The facts contained in the Declaration of Mr. Bennett are true and correct to the best of my knowledge, information, and belief.

4. I am co-counsel of record in this matter and will work closely with Mr. Bennett. As co-counsel of record, I understand that in the event that the Court grants this application, all notices, orders and pleadings shall be served upon me as local counsel, and I shall notify counsel of their receipt, and that only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees, or orders. I further understand that I will be held responsible for Mr. Bennett and the conduct of this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 10, 2026

/s/ *Paul R. DeFilippo*
Paul R. DeFilippo

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Counsel for the Cross-Holder Ad Hoc Group

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: MULTI-COLOR CORPORATION, *et al.*, Debtor.[1]	Chapter 11 Sat below: Hon. Michael B. Kaplan Case No. 26-10910 (MBK)
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DECLARATION OF BRUCE BENETT
IN SUPPORT OF MOTION FOR AN ORDER
ADMITTING BRUCE BENNETT TO APPEAR *PRO HAC VICE*

I, Bruce Bennett, of full age, hereby declare as follows:

1. I am Of Counsel with the law firm Jones Day, 555 South Flower Street, Fiftieth Floor, Los Angeles, California 90071.

[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' claims and noticing agent at https://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.

1. I make this Declaration in connection with my Motion to be admitted *pro hac vice* in the above captioned civil case to represent Appellant, the Cross-Holder Ad Hoc Group, including Canyon Capital Advisors.

2. I am a member in good standing of the bar of California State Court and have been since 1982. The roll of attorneys for California State Court is maintained at 845 S Figueroa Street, Los Angeles, California 90017.

3. I am a member in good standing of the bar of the U.S. Court of Appeals for the Second Circuit and have been since 2013. The roll of attorneys for the U.S. Court of Appeals for the Second Circuit is maintained at 40 Foley Square, New York, New York 10007.

4. I am a member in good standing of the bar of the U.S. Court of Appeals for the Ninth Circuit and have been since 1983. The roll of attorneys for the U.S. Court of Appeals for the Ninth Circuit is maintained at 95 Seventh Street, San Francisco, California 94103.

5. I am a member in good standing of the bar of the U.S. Court of Appeals for the Tenth Circuit and have been since 2015. The roll of attorneys for the U.S. Court of Appeals for the Tenth Circuit is maintained at 1823 Stout Street, Denver, Colorado 80257-1823.

6. I am member in good standing of the bar of the U.S. District Court for the Central District of California and have been since 1983. The roll of attorneys for

the U.S. District Court for the Central District of California is maintained at 350 W. 1st Street, Los Angeles, California 90012.

7. I am member in good standing of the bar of the U.S. District Court for the Northern District of California and have been since 1983. The roll of attorneys for the U.S. District Court for the Northern District of California is maintained at 450 Golden Gate Avenue, San Francisco, California 94102.

8. I am member in good standing of the bar of the U.S. District Court for the Southern District of California and have been since 1983. The roll of attorneys for the U.S. District Court for the Southern District of California is maintained at 333 W. Broadway, San Diego, California 92101.

9. I am member in good standing of the bar of the U.S. District Court for the Eastern District of California and have been since 1983. The roll of attorneys for the U.S. District Court for the Eastern District of California is maintained at 500 I Street, Sacramento, California 95814.

10. I am not under suspension or disbarment by any court.

11. I have no disciplinary proceeding pending against me in any jurisdiction, and no discipline has previously been imposed on me in any jurisdiction.

12. I have been advised of my obligation to make payments of an annual fee to the New Jersey Lawyers' Fund For Client Protection in accordance with New

Jersey Court Rule 1:28-2, and have already satisfied that payment for 2026 in connection with my admission *pro hac vice* before the U.S. Bankruptcy Court for the District of New Jersey in the related bankruptcy case, *In re: Multi-Color Corporation, et al.*, Case No. 26-10910 (MBK).

13. I have familiarized myself with the Local Rules promulgated by this Court and will at all times conduct myself in accordance with such Rules during the conduct of this case.

14. I understand that if I am admitted *pro hac vice* to this Court, I am within its disciplinary jurisdiction and I voluntarily consent to the same and certify that I will abide by all rules, regulations and orders of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 10, 2026

/s/ *Bruce Bennett*
Bruce Bennett

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ORDER ADMITTING BRUCE BENNETT TO APPEAR *PRO HAC VICE*

This matter having been brought before the Court on Motion for an Order Admitting Bruce Bennett to Appear *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. P. 78, D.N.J. L. Civ. R. 101.1(c), and good cause having been shown; it is

[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' claims and noticing agent at https://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.

ORDERED that Bruce Bennett 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 file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders; and it is further

ORDERED that Bruce Bennett 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(a) and D.N.J. L. Civ. R. 101.1(c)(2), said fee to be deposited via check payable to "Clerk, USDC" within twenty (20) days of the date of the entry of this Order; and it is further

ORDERED that Bruce Bennett shall be bound by the Local Rules of the United States District Court for the District of New Jersey.

Dated: May __, 2026

_____
Honorable Zahid N. Quraishi
United States District Judge