

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo
James N. Lawlor
Joseph F. Pacelli (Admission *pro hac vice*
pending)
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com
jlawlor@wmd-law.com
jpacelli@wmd-law.com

JONES DAY

Bruce Bennett
555 South Flower Street, Fiftieth Floor
Los Angeles, California 90071
Telephone: (213) 243-2382
Facsimile: (213) 243-2539
bbennett@jonesday.com
(Admission *pro hac vice* pending)

-and-

Benjamin Rosenblum
250 Vesey Street
New York, New York 10281
Telephone: (212) 326-8312
Facsimile: (212) 755-7306
brosenblum@jonesday.com
(Admission *pro hac vice* pending)

Counsel for the Cross-Holder Ad Hoc Group

In re:

MULTI-COLOR CORPORATION, *et al.*,

Debtors.¹

Chapter 11

Case No.: 26-10910 (MBK)

Judge: Michael B. Kaplan

**NOTICE OF CROSS-HOLDER AD HOC GROUP'S MOTION
TO DISMISS OR, IN THE ALTERNATIVE, TRANSFER THE CHAPTER 11 CASES**

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://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.

PLEASE TAKE NOTICE that a hearing on the Motion (the “Motion”) of the Cross-Holder Ad Hoc Group, including Canyon Capital Advisors, LLC (the “Cross-Holder Ad Hoc Group”) to dismiss or, in the alternative, transfer the Chapter 11 Cases will be held on the date set by the Court pursuant to an Order Shortening Time (the “OST”) and Application, as defined below, to be submitted (the “Hearing”), before the Honorable Judge Michael B. Kaplan, Clarkson S. Fisher United States Courthouse, 402 East State Street, Second Floor, Courtroom 8, Trenton, NJ 08608.

PLEASE TAKE FURTHER NOTICE that contemporaneously with the filing of the Motion, the Cross-Holder Ad Hoc Group filed an Application for Order Shortening Time and Certain Other Relief (the “Application”) requesting that the Court hear the Motion on January 30, 2026, at 1:00 p.m.

PLEASE TAKE FURTHER NOTICE that the Motion sets forth the relevant factual bases upon which the relief requested should be granted. A proposed Order granting the relief requested in the Motion is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections or responses, if any, to the relief requested in the Motion shall: (a) be in writing; (b) state with particularity the basis of the objection; and (c) be filed with the Clerk of the United States Bankruptcy Court electronically so as to be received on or before the date and time set forth in the Court’s order entered with respect to the Application, by: (i) counsel to the Cross-Holder Ad Hoc Group, (A) Jones Day, 555 South Flower Street, Fiftieth Floor Los Angeles, California 90071, Attn.: Bruce Bennett (bbennett@jonesday.com), (B) Jones Day, 250 Vesey Street New York, New York 10281, Attn.: Benjamin Rosenblum (brosenblum@jonesday.com), and (C) Wollmuth Maher & Deutsch LLP, 500 Fifth Avenue, New York, New York 10110, Attn.: Paul R. DeFilippo (pdefilippo@wmd-

law.com); (ii) counsel to the Debtors; (iii) the Office of the United States Trustee for the District of New Jersey, One Newark Center, Suite 2100, Newark, New Jersey 07102; and (iv) the other parties in interest on the list maintained by the Debtors' proposed noticing agent, available at <https://veritaglobal.net/mcc/document/noticelist/1>.

PLEASE TAKE FURTHER NOTICE that only those responses or objections that are timely filed, served, and received will be considered at the Hearing. Failure to file a timely objection may result in entry of a final order granting the Motion as requested by the movants.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: January 30, 2026

By: /s/ Paul R. DeFilippo

WOLLMUTH MAHER & DEUTSCH LLP

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Joseph F. Pacelli, Esq. (*pro hac vice* pending)

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Chapter 11

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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://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.

**THE CROSS-HOLDER AD HOC GROUP'S MOTION TO DISMISS
OR, IN THE ALTERNATIVE, TRANSFER THE CHAPTER 11 CASES**

The Cross-Holder Ad Hoc Group, including Canyon Capital Advisors, LLC (the “Cross-Holder Ad Hoc Group”), moves the Court for an order, substantially in the form attached hereto as Exhibit A, dismissing or, in the alternative, transferring the above-captioned chapter 11 cases (the “Chapter 11 Cases”) pursuant to Rule 1014(a)(2) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) on the basis of improper venue under 28 U.S.C. § 1408(2). In support of this Motion, the Cross-Holder Ad Hoc Group states as follows:

Jurisdiction and Venue

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the Standing Order of Reference to the Bankruptcy Court Under Title 11, entered July 23, 1984, and amended on June 6, 2025 (Bumb, C.J.) (the “Standing Order of Reference”). This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2. As set forth herein, venue is improper in this district pursuant to 28 U.S.C. § 1408.

3. The basis for the relief requested herein is Bankruptcy Rule 1014(a)(2).

Background

4. The Debtors commenced the Chapter 11 Cases in the District of New Jersey (this “District”) on January 29, 2026. The petition for Debtor MCC-Norwood, LLC (“MCC-Norwood”), an Ohio limited liability company, lists MCC-Norwood’s principal place of business as being located in Atlanta, Georgia. *See* MCC-Norwood petition § 4. The portion of the petition that requests the “[l]ocation of principal assets, if different from the principal place of business,” is blank. *Id.* Notwithstanding this, section 11 of the MCC-Norwood petition states, “Debtor has had its domicile, principal place of business, or principal assets in this district

for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.” *Id.* § 11. Each of the other Debtors’ petitions rely on MCC-Norwood’s venue in this District being proper as their basis for venue in this District.

Argument

1. A chapter 11 case may be commenced in the district “in which the domicile, residence, principal place of business in the United States, or principal assets in the United States” of the entity filing for chapter 11 are located. 28 U.S.C. § 1408(1). Once a debtor establishes proper venue in a district, affiliates of that debtor may commence chapter 11 cases in that same district. *See* 28 U.S.C. § 1408(2). But “[i]f a petition is filed in an improper district, the court may dismiss the case or may transfer it to another district [in the interest of justice or for the convenience of the parties].” Bankruptcy Rule 1014(a)(2). While the language of the rule is permissive, the majority view is that when venue is improper, a court must either dismiss or transfer the case. *See In re Blagg*, 223 B.R. 795, 800-803 (B.A.P. 10th Cir. 1998) (finding “[t]he majority of courts that have ruled on the issue have held that the bankruptcy court does not have discretion to retain jurisdiction over an improperly venued case where a timely objection has been filed.”); *In re 700 Tr.*, 31 Fla. L. Weekly Fed. B 39 (Bankr. N.D. Fla 2025) (same); *cf. Lafferty v. St. Riel*, 495 F.3d 72, 77 (3d Cir. 2007), *as amended* (July 19, 2007), *as amended* (Nov. 23, 2007) (discussing only transfer or dismissal of a case when venue is improper).

2. The Debtors’ admissions sworn under penalty of perjury prove that venue for the Chapter 11 Cases is improper in this District. MCC-Norwood, the entity that the Debtors claim establishes venue for all Debtors in this District, does not have its domicile or principal place of business in New Jersey, nor does it list any principal assets located in New Jersey. And neither the Disclosure Statement (ECF No. 18) nor the First Day Declaration (ECF No. 23) provide any support for venue in this District. As a result, the Court should either (a) dismiss the

Chapter 11 Cases or, in the alternative, (b) transfer the Chapter 11 Cases to the district in which the majority of the U.S. Debtors are domiciled—the District of Delaware.

Waiver of Memorandum of Law

The Cross-Holder Ad Hoc Group respectfully requests that the Court waive the requirement to file a separate memorandum of law pursuant to D.N.J. LBR 9013-1(a)(3) because the legal basis upon which the Cross-Holder Ad Hoc Group relies on is incorporated herein and the Motion does not raise any novel issues of law.

Notice

Notice of this Motion has been provided to: (a) counsel to the Debtors; (b) the U.S. Trustee; and (c) the other parties in interest on the list maintained by the Debtors' proposed noticing agent, available at <https://veritaglobal.net/mcc/document/noticelist/1>. In light of the nature of the relief requested herein, the Cross-Holder Ad Hoc Group submits that no other or further notice need be provided.

No Prior Request

No prior request for the relief sought in this Motion has been made to this or any other court in connection with these Chapter 11 Cases.

WHEREFORE, the Cross-Holder Ad Hoc Group respectfully requests that the Court enter an order, substantially in the form submitted herewith: (a) dismissing the Chapter 11 Cases or, in the alternative, transferring the Chapter 11 Cases to the District of Delaware; and (b) granting such other relief to the Cross-Holder Ad Hoc Group as the Court may deem proper.

Dated: January 30, 2026

WOLLMUTH MAHER & DEUTSCH LLP

/s/Paul R. DeFilippo

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In re:

MULTI-COLOR CORPORATION, *et al.*,

Debtors.¹

Chapter 11

Case No. 26-10910 (MBK)

Judge: Michael B. Kaplan

ORDER [DISMISSING/TRANSFERRING] THE CHAPTER 11 CASES

The relief set forth on the following pages is hereby **ORDERED**.

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://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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Debtor: Multi-Color Corporation

Case No. 26-10910-MBK

Caption: Order [Dismissing/Transferring] the Chapter 11 Cases

This matter coming before the Court on the *Cross-Holder Ad Hoc Group's*

Motion to Dismiss or, in the Alternative, Transfer the Chapter 11 Cases (the "Motion"),² filed by the Cross-Holder Ad Hoc Group; the Court having reviewed the Motion and having considered the statements of counsel and the evidence adduced with respect to the Motion at a hearing before the Court (the "Hearing"); the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Standing Order of Reference, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b), and (c) notice of the Motion and the Hearing was sufficient under the circumstances; and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The Chapter 11 Cases are hereby [dismissed/transferred to the District of Delaware].
3. This Court shall retain exclusive jurisdiction over any and all matters arising from or related to the implementation, interpretation or enforcement of this Order.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.