

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 15
	)	
CINRAM INTERNATIONAL INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 12-11882 (KJC)
	)	(Jointly Administered)
Debtors in a Foreign Proceeding.	)	
	)	Honorable Kevin J. Carey

**NOTICE OF APPEARANCE AND REQUEST FOR ELECTRONIC NOTICE  
FOR UNITED STATES GOVERNMENT ATTORNEY ERIKA E. BARNES**

PLEASE TAKE NOTICE that the Pension Benefit Guaranty Corporation (“PBGC”), an agency of the United States Government and a creditor in the above-captioned cases, hereby files this notice of appearance and request for electronic notice pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and requests, pursuant to Section 1109(b) of Title 11, United States Code and Bankruptcy Rules 2002(j)(4), 3017(d) and 9007, that notice of all matters which may come before the Court concerning the above-captioned cases and debtors be given to and served upon PBGC as listed below.

This request includes, *inter alia*, the notices and papers referred to in Bankruptcy Rules 2002, 3017 (including all disclosure statements and plans of reorganization) and 9007, notices of any orders, applications, complaints, demands, hearings, motions, petitions, pleadings or requests, and any other documents brought before this Court in these cases, whether formal or informal, ex parte or on notice, written or oral, or transmitted or conveyed by mail, electronic mail, personal delivery, telephone, facsimile, or otherwise.

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<sup>1</sup> The last four digits of the United States Tax Identification Number or Canadian Business Number, as applicable, of each of the Debtors follow in parentheses: (a) Cinram International Inc. (4583); (b) Cinram (U.S.) Holding’s Inc. (4792); (c) Cinram, Inc. (7621); (d) Cinram Distribution LLC (3854); (e) Cinram Manufacturing LLC (2945); (f) Cinram Retail Services LLC (1741); (g) Cinram Wireless LLC (5915); (h) IHC Corporation (4225); and (i) One K Studios, LLC (2132). The Debtors’ executive headquarters is located at 2255 Markham Road, Toronto, Ontario, M1B 2W3, Canada.

PLEASE TAKE FURTHER NOTICE that this entry of appearance and request for notice is without prejudice to PBGC's rights, remedies, and claims against other entities or any objection that may be made to the jurisdiction or venue of the Court or venue of these cases, and shall not be deemed or construed to be a waiver of PBGC's rights: (i) to have final orders and non-core matters entered only after *de novo* review by a district court, (ii) to trial by jury in any proceedings so triable in these cases or in any controversy or proceeding related to these cases, (iii) to have the district court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to assert any other rights, claims, actions, defenses, setoffs or recoupments to which PBGC is or may be entitled in law or in equity, all of which PBGC expressly reserves.

DATED: June 29, 2012  
Washington, D.C.

Respectfully submitted,

/s/ Erika E. Barnes  
Erika E. Barnes, Attorney  
Pension Benefit Guaranty Corp.  
Office of the Chief Counsel  
1200 K Street, N.W.  
Washington, D.C. 20005-4026  
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Debtors in a Foreign Proceeding.	)	
	)	Honorable Kevin J. Carey

**CERTIFICATION OF UNITED STATES  
GOVERNMENT ATTORNEY ERIKA E. BARNES**

I, Erika E. Barnes, am an attorney representing the Pension Benefit Guaranty Corporation (“PBGC”), a creditor in these cases. The PBGC is a United States Government corporation that administers and enforces the pension plan termination program established under Title IV of the Employee Retirement Income Security Act of 1974 (“ERISA”), *as amended*, 29 U.S.C. §§ 1001-1461 (2006 & Supp. IV 2010). I certify that I am a member in good standing of the bars of the State of California and the District of Columbia, of good moral character and not subject to pending disciplinary proceedings.

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I further state that I will be bound by the rules of this Court and submit to the jurisdiction of this Court for disciplinary purposes.

DATED: June 29, 2012  
Washington, D.C.

Respectfully submitted,

/s/ Erika E. Barnes

Erika E. Barnes

Attorney

Pension Benefit Guaranty Corp.

Office of the Chief Counsel

1200 K Street, N.W.

Washington, D.C. 20005-4026

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[efile@pbgc.gov](mailto:efile@pbgc.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 29th day of June 2012, the Pension Benefit Guaranty Corporation's Notice of Appearance and Request for Electronic Notice for United States Government Attorney Erika E. Barnes and Certification of United States Government Attorney were served electronically or by First-Class Mail on the following:

Douglas P. Bartner Fredric Sosnick Jill Frizzley Shearman & Sterling LLP 599 Lexington Avenue New York, NY 10022-6069 <b>Debtors' Counsel</b> <b>via First Class Mail</b>	Kenneth J. Enos Pauline K. Morgan Robert Britton Young, Conaway, Stargatt & Taylor 1000 North King Street Wilmington, DE 19801 <b>Debtors' Counsel</b> <b>via CM/ECF</b>
United States Trustee 844 King Street, Room 2207 Lockbox #35 Wilmington, DE 19899-0035 <b>U.S. Trustee</b> <b>via CM/ECF</b>	

/s/ Erika E. Barnes \_\_\_\_\_  
Erika E. Barnes