

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

----- x
:
In re : Chapter 11
:
MOLYCORP, INC., *et al.*,¹ : Case No. 15-11357 (CSS)
:
Debtors. : (Jointly Administered)
:
:
----- x

**THIRD AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON JULY 20, 2015 AT 10:00 A.M. (ET)**

ADJOURNED MATTERS:

1. Motion of Debtors for an Order Establishing Procedures to Resolve Claims Arising Under Section 503(b)(9) of the Bankruptcy Code [D.I. 111, 7/1/15]

Response/Objection Deadline: July 13, 2015 at 4:00 p.m. (ET)
(extended to July 15, 2015 at 4:00 p.m. for the United States Trustee and 5:00 p.m. the Official Committee of Unsecured Creditors)

Related Pleadings: None

Objections/Responses Received:

- a) Informal Response of the United States Trustee

Status: This matter has been adjourned to August 17, 2015 at 1:00 p.m. (ET) at the request of the United States Trustee.

¹ The Debtors are the following 21 entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Molycorp, Inc. (1797); Industrial Minerals, LLC; Magnequench, Inc. (1833); Magnequench International, Inc. (7801); Magnequench Limited; Molycorp Advanced Water Technologies, LLC (1628); MCP Callco ULC; MCP Canada Holdings ULC; MCP Canada Limited Partnership; MCP Exchangeco Inc.; Molycorp Chemicals & Oxides, Inc. (8647); Molycorp Luxembourg Holdings S.à r.l.; Molycorp Metals & Alloys, Inc. (9242); Molycorp Minerals Canada ULC; Molycorp Minerals, LLC (4170); Molycorp Rare Metals Holdings, Inc. (4615); Molycorp Rare Metals (Utah), Inc. (7445); Neo International Corp.; PP IV Mountain Pass, Inc. (1205); PP IV Mountain Pass II, Inc. (5361); RCF IV Speedwagon Inc. (0845). Molycorp's United States headquarters is located at 5619 DTC Parkway, Suite 1000, Greenwood Village, Colorado 80111.

² Amended items appear in bold.

2. Application of the Debtors for an Order Authorizing Them to Retain and Employ Jones Day as Counsel, *Nunc Pro Tunc* as of the Petition Date [D.I. 115, 7/1/15]

Response/Objection Deadline: July 13, 2015 at 4:00 p.m. (ET)
(extended to July 15, 2015 at 4:00 p.m. for the United States Trustee and August 10, 2015 at 4:00 p.m. for the Official Committee of Unsecured Creditors)

Related Pleadings:

- a) Supplement to Disclosure of Compensation of Jones Day [D.I. 165, 7/10/15]
- b) Emergency Motion of the Official Committee of Unsecured Creditors for Entry of an Order Adjourning the Objection Deadline and Hearing on the Jones Day and Miller Buckfire Retention Applications [D.I. 183, 7/15/15]
- c) Motion of the Official Committee of Unsecured Creditors for an Order Shortening the Notice Period and Expedited Ruling on the Emergency Motion of the Official Committee of Unsecured Creditors for Entry of an Order Adjourning the Objection Deadline and Hearing on the Jones Day and Miller Buckfire Retention Applications [D.I. 184, 7/15/15]
- d) Supplemental Declaration of Paul D. Leake in Support of Application of the Debtors for an Order Authorizing Them to Retain and Employ Jones Day as Counsel, *Nunc Pro Tunc* as of the Petition Date [D.I. 187, 7/15/15]
- e) Debtors' Objection to the Emergency Motion of the Official Committee of Unsecured Creditors for Entry of an Order Adjourning the Objection Deadline and Hearing on the Jones Day and Miller Buckfire Retention Applications [D.I. 189, 7/15/15]
- f) Order Granting Emergency Motion of the Official Committee of Unsecured Creditors for Entry of an Order Adjourning the Objection Deadline and Hearing on the Jones Day and Miller Buckfire Retention Applications [D.I. 193, 7/16/15]

Objections/Responses Received:

- g) Omnibus of Objection United States Trustees Limited Omnibus Objection to Application of the Debtors for an Order Authorizing Them to Retain and Employ Jones Day as Counsel, *Nunc Pro Tunc* as of the Petition Date (D. E. 115); Application of the Debtors for an Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Attorneys for the Debtors, *Nunc Pro Tunc* to The Petition Date (D. E. 117); Application of Debtors (I) to Retain and Employ Miller Buckfire & Co., LLC as Investment Banker *Nunc Pro Tunc* as of the Petition Date and (II) Seeking Waiver of Certain Informational Requirements of Local Rule 2016-1 (D.E. 119); and Debtors Application for an Order Authorizing Them to Retain and Employ Alixpartners, LLP as Financial Advisor *Nunc Pro Tunc* as of the Petition Date (D.E. 120) [D.I. 180, 7/15/15]

Status: This matter is adjourned to August 17, 2015 at 1:00 p.m. (ET).

3. Application of the Debtors (I) to Retain and Employ Miller Buckfire & Co., LLC as Investment Banker *Nunc Pro Tunc* as of the Petition Date and (II) Seeking Waiver of Certain Informational Requirements of Local Rule 2016-2 [D.I. 119, 7/1/15]

Response/Objection Deadline:

July 13, 2015 at 4:00 p.m. (ET)
(extended to July 14, 2015 at 4:00
p.m. for OCM MLYCo CTB Ltd.
and to July 15, 2015 at Noon for the
United States Trustee and August 10,
2015 at 4:00 p.m. for the Official
Committee of Unsecured Creditors)

Related Pleadings:

- a) Emergency Motion of the Official Committee of Unsecured Creditors for Entry of an Order Adjourning the Objection Deadline and Hearing on the Jones Day and Miller Buckfire Retention Applications [D.I. 183, 7/15/15]
- b) Motion of the Official Committee of Unsecured Creditors for an Order Shortening the Notice Period and Expedited Ruling on the Emergency Motion of the Official Committee of Unsecured Creditors for Entry of an Order Adjourning the Objection Deadline and Hearing on the Jones Day and Miller Buckfire Retention Applications [D.I. 184, 7/15/15]
- c) Supplemental Declaration of Alexander Tracy in Support of the Application of Debtors (I) to Retain and Employ Miller Buckfire & Co., LLC as Investment Banker *Nunc Pro Tunc* as of the Petition Date and (II) Seeking Waiver of Certain Informational Requirements of Local Rule 2016-2 [D.I. 188, 7/15/15]
- e) Debtors' Objection to the Emergency Motion of the Official Committee of Unsecured Creditors for Entry of an Order Adjourning the Objection Deadline and Hearing on the Jones Day and Miller Buckfire Retention Applications [D.I. 189, 7/15/15]
- f) Order Granting Emergency Motion of the Official Committee of Unsecured Creditors for Entry of an Order Adjourning the Objection Deadline and Hearing on the Jones Day and Miller Buckfire Retention Applications [D.I. 193, 7/16/15]

Objections/Responses Received:

- g) Omnibus of Objection United States Trustees Limited Omnibus Objection to Application of the Debtors for an Order Authorizing Them to Retain and Employ Jones Day as Counsel, *Nunc Pro Tunc* as of the Petition Date (D. E. 115); Application of the Debtors for an Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Attorneys for the Debtors, *Nunc Pro Tunc* to The Petition Date (D. E. 117); Application of Debtors (I) to Retain and Employ Miller Buckfire & Co., LLC as Investment Banker *Nunc Pro Tunc* as of the Petition Date and (II) Seeking Waiver of Certain Informational Requirements of Local Rule 2016-1 (D.E. 119); and Debtors Application for an Order Authorizing Them to Retain and Employ Alixpartners, LLP as Financial Advisor *Nunc Pro Tunc* as of the Petition Date (D.E. 120) [D.I. 180, 7/15/15]

Status: This matter is adjourned to August 17, 2015 at 1:00 p.m. (ET).

MATTERS GOING FORWARD –CERTIFICATION FILED:

- 4. Application for an Order Authorizing the Debtors to Retain and Employ Prime Clerk LLC as Administrative Advisor, *Nunc Pro Tunc* as of the Petition Date [D.I. 118, 7/1/15]

Response/Objection Deadline:

July 13, 2015 at 4:00 p.m. (ET)
(extended to July 15, 2015 at 5:00
p.m. for the Official Committee of
Unsecured Creditors)

Related Pleadings:

- a) Certification of No Objection Regarding Docket No. 118 [D.I. 185, 7/15/15]
- b) Order Authorizing the Debtors to Retain and Employ Prime Clerk LLC as Administrative Advisor, *Nunc Pro Tunc* as of the Petition Date [D.I. 198, 7/16/15]

Objections/Responses Received:

None

Status: The Order has been entered. No hearing is necessary.

MATTERS GOING FORWARD:

- 5. Motion of the Debtors for Interim and Final Orders Establishing Adequate Assurance Procedures with Respect to Their Utility Providers Pursuant to Section 366 of the Bankruptcy Code [D.I. 4, 6/25/15]

Response/Objection Deadline:

July 13, 2015 at 4:00 p.m. (ET) (extended to July 14, 2015 at 5:00 p.m. for Salt River Project and Southern California Edison; extended to July 15, 2015 at 4:00 p.m. for the United States Trustee and 5:00 p.m. for the Official Committee of Unsecured Creditors and July 16, 2015 at 11:00 a.m. for EDF Energy Services)

Related Pleadings:

- a) Interim Order Establishing Adequate Assurance Procedures with Respect to the Debtors' Utility Providers Pursuant to Section 366 of the Bankruptcy Code [D.I. 90, 6/26/15]
- b) Omnibus Notice of Proposed Final Orders [D.I. 103, 6/30/15]
- c) Omnibus Notice of Pleadings and Hearing Thereon [D.I. 104, 6/30/15]
- d) Supplemental Statement of the Debtors in Support of Certain Proposed First Day Orders [D.I. 190, 7/15/15]

Objections/Responses Received:

- e) Informal Response of Salt River Project
- f) Informal Response of Southern California Edison
- g) Informal Response of EDF Energy Services
- h) Informal Response of Kern River
- i) Reservation of Rights and Limited Objection of Official Committee of Unsecured Creditors with Respect to (A) Certain First Day Orders, (B) Certain Motions Scheduled for Hearing on July 20, 2015 at 10:00 A.M. (Eastern Time), and (C) Certain Proposed Final Orders [D.I. 192, 7/16/15]

Additional Pleadings:

- j) Certification of Counsel Regarding Final Order Establishing Adequate Assurance Procedures with Respect to the Debtors' Utility Providers Pursuant to Section 366 of the Bankruptcy Code [D.I. 207, 7/17/15]
- k) Order Establishing Adequate Assurance Procedures with Respect to the Debtors' Utility Providers Pursuant to Section 366 of the Bankruptcy Code [D.I. 225, 7/17/15]**

Status: The order has been entered. No hearing is necessary.

6. Motion of the Debtors for an Order Authorizing Them to (I) Maintain Certain Customer Programs and (II) Honor or Pay Related Prepetition Obligations to Their Customers [D.I. 9, 6/25/15]

Response/Objection Deadline: July 13, 2015 at 4:00 p.m. (ET)
(extended to July 15, 2015 at 4:00 p.m. for the United States Trustee and 5:00 p.m. for the Official Committee of Unsecured Creditors)

Related Pleadings:

- a) Order Authorizing Debtors to (I) Maintain Certain Customer Programs and (II) Honor or Pay Related Prepetition Obligations to Their Customers [D.I. 79, 6/26/15]
- b) Omnibus Notice of Proposed Final Orders [D.I. 103, 6/30/15]
- c) Omnibus Notice of Pleadings and Hearing Thereon [D.I. 104, 6/30/15]
- d) Supplemental Statement of the Debtors in Support of Certain Proposed First Day Orders [D.I. 190, 7/15/15]

Objections/Responses Received:

- e) Informal Response of the United States Trustee
- f) Reservation of Rights and Limited Objection of Official Committee of Unsecured Creditors with Respect to (A) Certain First Day Orders, (B) Certain Motions Scheduled for Hearing on July 20, 2015 at 10:00 A.M. (Eastern Time), and (C) Certain Proposed Final Orders [D.I. 192, 7/16/15]

Additional Pleadings:

- g) Certification of Counsel Regarding Final Order Authorizing the Debtors to (I) Maintain Certain Customer Programs and (II) Honor or Pay Related Prepetition Obligations to Their Customers [D.I. 208, 7/17/15]
- h) Final Order Authorizing the Debtors to (I) Maintain Certain Customer Programs and (II) Honor or Pay Related Prepetition Obligations to Their Customers [D.I. 222, 7/17/15]**

Status: The order has been entered. No hearing is necessary.

7. Motion of the Debtors for Orders Authorizing Them to Pay Prepetition Employee Wages, Benefits, Business Expenses and Related Items [D.I. 10, 6/25/15]

Response/Objection Deadline: July 13, 2015 at 4:00 p.m. (ET)
(extended to July 15, 2015 at 4:00 p.m. for the United States Trustee and July 16, 2015 at 10:00 a.m. for the Official Committee of Unsecured Creditors)

Related Pleadings:

- a) Order Authorizing Debtors to Pay Prepetition Employee Wages, Benefits, Business Expenses and Related Items [D.I. 82, 6/26/15]
- b) Omnibus Notice of Pleadings and Hearing Thereon [D.I. 104, 6/30/15]
- c) Supplemental Statement of the Debtors in Support of Certain Proposed First Day Orders [D.I. 190, 7/15/15]

Objections/Responses Received:

- d) Informal Response of the United States Trustee
- e) Reservation of Rights and Limited Objection of Official Committee of Unsecured Creditors with Respect to (A) Certain First Day Orders, (B) Certain Motions Scheduled for Hearing on July 20, 2015 at 10:00 A.M. (Eastern Time), and (C) Certain Proposed Final Orders [D.I. 192, 7/16/15]

Additional Pleadings:

- f) Certification of Counsel Regarding Further Order Authorizing Debtors to Pay Prepetition Employee Wages, Benefits, Business Expenses and Related Items [D.I. 209, 7/17/15]
- g) Further Order Authorizing Debtors to Pay Prepetition Employee Wages, Benefits, Business Expenses and Related Items [D.I. 223, 7/17/15]**

Status: The order has been entered. No hearing is necessary.

- 8. Motion for Entry of Interim and Final Orders (I) Establishing Notice and Objection Procedures for Transfers of Equity Securities and (II) Establishing a Record Date for Notice and Sell-Down Procedures for Trading in Claims Against the Debtors Estates [D.I. 15, 6/25/15]

Response/Objection Deadline: July 13, 2015 at 4:00 p.m. (ET)
(extended to July 15, 2015 at 4:00 p.m. for the United States Trustee and July 16, 2015 at 10:00 a.m. for the Official Committee of Unsecured Creditors)

Related Pleadings:

- a) Interim Order (I) Establishing Notice and Objection Procedures for Transfers of Equity Securities and (II) Establishing a Record Date for Notice and Sell-Down Procedures for Trading in Claims Against the Debtors Estates and (III) Scheduling a Final Hearing [D.I. 88, 6/26/15]
- b) Omnibus Notice of Pleadings and Hearing Thereon [D.I. 104, 6/30/15]

Objections/Responses Received:

- c) Reservation of Rights and Limited Objection of Official Committee of Unsecured Creditors with Respect to (A) Certain First Day Orders, (B) Certain Motions Scheduled for Hearing on July 20, 2015 at 10:00 A.M. (Eastern Time), and (C) Certain Proposed Final Orders [D.I. 192, 7/16/15]

Additional Pleadings:

- d) Certification of Counsel Regarding Final Order (I) Establishing Notice and Objection Procedures for Transfers of Equity Securities and (II) Establishing a Record Date for Notice and Sell-Down Procedures for Trading in Claims Against the Debtors Estates [D.I. 210, 7/17/15]
- e) **Final Order Establishing Notice and Objection Procedures for Transfers of Equity Securities and (II) Establishing a Record Date for Notice and Sell-Down Procedures for Trading in Claims Against the Debtors Estates [D.I. 226, 7/17/15]**

Status: The order has been entered. No hearing is necessary.

- 9. Motion of the Debtors for an Order Authorizing the Retention and Payment of Professionals Utilized by the Debtors in the Ordinary Course of Business [D.I. 112, 7/1/15]

Response/Objection Deadline: July 13, 2015 at 4:00 p.m. (ET)
(extended to July 15, 2015 at 4:00 p.m. for the United States Trustee and 5:00 p.m. for the Official Committee of Unsecured Creditors)

Related Pleadings:

- a) Notice of Supplement to List of Ordinary Course Professionals [D.I. 186, 7/15/15]

Objections/Responses Received:

- b) Informal Response of the United States Trustee

- c) Reservation of Rights and Limited Objection of Official Committee of Unsecured Creditors with Respect to (A) Certain First Day Orders, (B) Certain Motions Scheduled for Hearing on July 20, 2015 at 10:00 A.M. (Eastern Time), and (C) Certain Proposed Final Orders [D.I. 192, 7/16/15]

Additional Pleadings:

- d) Certification of Counsel Regarding Order Authorizing the Retention and Payment of Professionals Utilized by the Debtors in the Ordinary Course of Business [D.I. 200, 7/16/15]
- e) **Order Authorizing the Retention and Payment of Professionals Utilized by the Debtors in the Ordinary Course of Business [D.I. 224, 7/15/15]**

Status: The order has been entered. No hearing is necessary.

- 10. Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [D.I. 113, 7/1/15]

Response/Objection Deadline: July 13, 2015 at 4:00 p.m. (ET)
(extended to July 15, 2015 at 4:00 p.m. for the United States Trustee and 5:00 p.m. for the Official Committee of Unsecured Creditors)

Related Pleadings: None

Objections/Responses Received:

- a) Informal Response of the United States Trustee
- b) Reservation of Rights and Limited Objection of Official Committee of Unsecured Creditors with Respect to (A) Certain First Day Orders, (B) Certain Motions Scheduled for Hearing on July 20, 2015 at 10:00 A.M. (Eastern Time), and (C) Certain Proposed Final Orders [D.I. 192, 7/16/15]

Additional Pleadings:

- c) Certification of Counsel Regarding Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [D.I. 202, 7/16/15]
- d) **Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [D.I. 229, 7/17/15]**

Status: The order has been entered. No hearing is necessary.

11. Application of the Debtors for an Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Counsel to the Debtors, *Nunc Pro Tunc* to the Petition Date [D.I. 117, 7/1/15]

Response/Objection Deadline: July 13, 2015 at 4:00 p.m. (ET)
(extended to July 15, 2015 at 4:00 p.m. for the United States Trustee and 5:00 p.m. for the Official Committee of Unsecured Creditors)

Related Pleadings: None

Objections/Responses Received:

- a) Omnibus of Objection United States Trustees Limited Omnibus Objection to Application of the Debtors for an Order Authorizing Them to Retain and Employ Jones Day as Counsel, *Nunc Pro Tunc* as of the Petition Date (D. E. 115); Application of the Debtors for an Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Attorneys for the Debtors, *Nunc Pro Tunc* to The Petition Date (D. E. 117); Application of Debtors (I) to Retain and Employ Miller Buckfire & Co., LLC as Investment Banker *Nunc Pro Tunc* as of the Petition Date and (II) Seeking Waiver of Certain Informational Requirements of Local Rule 2016-1 (D.E. 119); and Debtors Application for an Order Authorizing Them to Retain and Employ Alixpartners, LLP as Financial Advisor *Nunc Pro Tunc* as of the Petition Date (D.E. 120) [D.I. 180, 7/15/15]
- b) Reservation of Rights and Limited Objection of Official Committee of Unsecured Creditors with Respect to (A) Certain First Day Orders, (B) Certain Motions Scheduled for Hearing on July 20, 2015 at 10:00 A.M. (Eastern Time), and (C) Certain Proposed Final Orders [D.I. 192, 7/16/15]

Additional Pleadings:

- c) Certification of Counsel Regarding Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Counsel to the Debtors, *Nunc Pro Tunc* to the Petition Date [D.I. 199, 7/16/15]
- d) Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Counsel to the Debtors, *Nunc Pro Tunc* to the Petition Date [D.I. 228, 7/17/15]**

Status: With the consent of the Office of the United States Trustee, the Debtors have filed a revised proposed form of order under certification of counsel that adjourns the evergreen retainer request objected to by the Office of the United States Trustee to August 17, 2015 at 1:00 p.m. (ET), permitting the remainder of the matter to go forward on an uncontested basis. **The order has been entered. No hearing is necessary.**

12. Debtors' Application for an Order Authorizing Them to Retain and Employ AlixPartners, LLP as Financial Advisor, *Nunc Pro Tunc* as of the Petition Date [D.I. 120, 7/1/15]

Response/Objection Deadline: July 13, 2015 at 4:00 p.m. (ET)
(extended to July 15, 2015 at 4:00 p.m. for the United States Trustee and 5:00 p.m. for the Official Committee of Unsecured Creditors)

Related Pleadings: None

Objections/Responses Received:

- a) Omnibus of Objection United States Trustees Limited Omnibus Objection to Application of the Debtors for an Order Authorizing Them to Retain and Employ Jones Day as Counsel, *Nunc Pro Tunc* as of the Petition Date (D. E. 115); Application of the Debtors for an Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Attorneys for the Debtors, *Nunc Pro Tunc* to The Petition Date (D. E. 117); Application of Debtors (I) to Retain and Employ Miller Buckfire & Co., LLC as Investment Banker *Nunc Pro Tunc* as of the Petition Date and (II) Seeking Waiver of Certain Informational Requirements of Local Rule 2016-1 (D.E. 119); and Debtors Application for an Order Authorizing Them to Retain and Employ Alixpartners, LLP as Financial Advisor *Nunc Pro Tunc* as of the Petition Date (D.E. 120) [D.I. 180, 7/15/15]
- b) Reservation of Rights and Limited Objection of Official Committee of Unsecured Creditors with Respect to (A) Certain First Day Orders, (B) Certain Motions Scheduled for Hearing on July 20, 2015 at 10:00 A.M. (Eastern Time), and (C) Certain Proposed Final Orders [D.I. 192, 7/16/15]

Additional Pleadings:

- c) Certification of Counsel Regarding Order Authorizing Them to Retain and Employ AlixPartners, LLP as Financial Advisor, *Nunc Pro Tunc* as of the Petition Date [D.I. 201, 7/16/15]
- d) **Order Authorizing Them to Retain and Employ AlixPartners, LLP as Financial Advisor, *Nunc Pro Tunc* as of the Petition Date [D.I. 227, 7/17/15]**

Status: With the consent of the Office of the United States Trustee, the Debtors have filed a revised proposed form of order under certification of counsel that adjourns the evergreen retainer request objected to by the Office of the United States Trustee to August 17, 2015 at 1:00 p.m. (ET), permitting the remainder of the matter to go forward on an uncontested basis. **The order has been entered. No hearing is necessary.**

CONTESTED MATTERS GOING FORWARD:

13. Motion of the Debtors for an Order Authorizing Them to Pay Prepetition Claims of Certain Unsecured Essential Suppliers [D.I. 11, 6/25/15]

Response/Objection Deadline: July 13, 2015 at 4:00 p.m. (ET)
(extended to July 15, 2015 at 4:00 p.m. for the United States Trustee and July 16, 2015 at 10:00 a.m. for the Official Committee of Unsecured Creditors)

Related Pleadings:

- a) Order Authorizing Debtors to Pay Prepetition Claims of Certain Unsecured Essential Suppliers [D.I. 92, 6/26/15]
- b) Omnibus Notice of Proposed Final Order [D.I. 103, 6/30/15]
- c) Omnibus Notice of Pleadings and Hearing Thereon [D.I. 104, 6/30/15]
- d) Supplemental Statement of the Debtors in Support of Certain Proposed First Day Orders [D.I. 190, 7/15/15]

Objections/Responses Received:

- e) United States Trustee's Limited Objection to Motion of the Debtors for an Order Authorizing Them to Pay Prepetition Claims of Certain Unsecured Essential Suppliers (D.E. 11) [D.I. 181, 7/15/15]
- f) Reservation of Rights and Limited Objection of Official Committee of Unsecured Creditors with Respect to (A) Certain First Day Orders, (B) Certain Motions Scheduled for Hearing on July 20, 2015 at 10:00 A.M. (Eastern Time), and (C) Certain Proposed Final Orders [D.I. 192, 7/16/15]

Status: This matter is going forward.

14. Motion of the Debtors for an Order (I) Approving the Continued Use of the Debtors' Cash Management System, Bank Accounts and Business Forms; (II) Permitting Certain Inter-Debtor Transactions, Intercompany Transactions and Setoffs and (III) Granting Related Relief [D.I. 14, 6/25/15]

Response/Objection Deadline:

July 13, 2015 at 4:00 p.m. (ET)
(extended to July 14, 2015 at 4:00
p.m. for OCM MLYCo CTB Ltd.
and to July 15, 2015 at 4:00 p.m. for
the United States Trustee and July
16, 2015 at 10:00 a.m. for the
Official Committee of Unsecured
Creditors)

Related Pleadings:

- a) Interim Order (I) Approving the Continued Use of the Debtors' Cash Management System, Bank Accounts and Business Forms; (II) Permitting Certain Inter-Debtor Transactions, Intercompany Transactions and Setoffs and (III) Granting Related Relief [D.I. 90, 6/26/15]
- b) Omnibus Notice of Proposed Final Order [D.I. 103, 6/30/15]
- c) Omnibus Notice of Pleadings and Hearing Thereon [D.I. 104, 6/30/15]
- d) Supplemental Statement of the Debtors in Support of Certain Proposed First Day Orders [D.I. 190, 7/15/15]

Objections/Responses Received:

- e) Reservation of Rights and Limited Objection of Official Committee of Unsecured Creditors with Respect to (A) Certain First Day Orders, (B) Certain Motions Scheduled for Hearing on July 20, 2015 at 10:00 A.M. (Eastern Time), and (C) Certain Proposed Final Orders [D.I. 192, 7/16/15]

Status: This matter is going forward. The Debtors will present a revised proposed form of order incorporating comments from various parties in interest at or before the hearing.

15. Motion of the Debtors for Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 365 and 507 of the Bankruptcy Code: (I) Authorizing Debtors to Obtain Superpriority Secured Debtor in Possession Financing; (II) Authorizing Debtors to Use Cash Collateral; (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 109, 7/1/15]

Response/Objection Deadline:

July 15, 2015 at 12 Noon (ET)
(extended to July 17, 2015 at Noon
for the Official Committee of
Unsecured Creditors and Certain
Holders of the Molycorp, Inc. 10%
Senior Secured Notes with
permission from the Court)

Related Pleadings:

- a) Notice of Filing of Proposed DIP Budget [D.I. 125, 7/2/15]
- b) Interim Order Pursuant to Sections 105, 361, 362, 363, 364, 365 and 507 of the Bankruptcy Code: (I) Authorizing Debtors to Obtain Superpriority Secured Debtor in Possession Financing; (II) Authorizing Debtors to Use Cash Collateral; (II) Granting Adequate Protection to Prepetition Secured Parties; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 130, 7/2/15]
- c) Notice of Entry of Interim Order and Final Hearing on Motion of the Debtors for Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 365 and 507 of the Bankruptcy Code: (I) Authorizing Debtors to Obtain Superpriority Secured Debtor in Possession Financing; (II) Authorizing Debtors to Use Cash Collateral; (II) Granting Adequate Protection to Prepetition Secured Parties; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 131, 7/2/15]
- d) Notice of Supplement to Motion of the Debtors for Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 365 and 507 of the Bankruptcy Code: (I) Authorizing Debtors to Obtain Superpriority Secured Debtor in Possession Financing; (II) Authorizing Debtors to Use Cash Collateral; (II) Granting Adequate Protection to Prepetition Secured Parties; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 173, 7/14/15]
- e) Stipulation and Protective Order [D.I. 182, 7/15/15]
- f) Notice of Filing of Proposed Final Order Pursuant to Sections 105, 361, 362, 363, 364, 365 and 507 of the Bankruptcy Code: (I) Authorizing Debtors to Obtain Superpriority Secured Debtor in Possession Financing; (II) Authorizing Debtors to Use Cash Collateral; (II) Granting Adequate Protection to Prepetition Secured Parties; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 191, 7/16/15]

Objections/Responses Received:

- g) Ironshore, Lexon and BSG's Limited Opposition to Debtors' Motion for Entry of Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 365 and 507 of the Bankruptcy Code: (I) Authorizing Debtors to Obtain Superpriority Secured Debtor in Possession Financing; (II) Authorizing Debtors to Use Cash Collateral; (II) Granting Adequate Protection to Prepetition Secured Parties; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 175, 7/15/15]
- h) Reservation of Rights filed by PACCAR Financial Corp. [D.I. 176, 7/15/15]

- i) United States Trustees Reservation of Rights Regarding the Motion of Debtors for Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 365 and 507 of the Bankruptcy Code: (I) Authorizing Debtors to Obtain Superpriority Secured Debtor in Possession Financing; (II) Authorizing Debtors to Use Cash Collateral; (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 177, 7/15/15]
- j) Limited Objection of Wells Fargo Bank, National Association, as Indenture Trustee and Collateral Agent, to Motion of the Debtors for Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 365 and 506 of the Bankruptcy Code: (I) Authorizing Debtors to Obtain Superpriority Secured Debtor in Possession Financing; (II) Authorizing Debtors to Use Cash Collateral; (III) Granting Adequate Protection to Prepetition Secured Parties; and (IV) Granting Related Relief [D.I. 194, 7/16/15]

Additional Pleadings:

- k) Notice of Filing of Credit Agreement Relating to Motion of the Debtors for Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 365 and 507 of the Bankruptcy Code: (I) Authorizing Debtors to Obtain Superpriority Secured Debtor In Possession Financing; (II) Authorizing Debtors to Use Cash Collateral; (II) Granting Adequate Protection to Prepetition Secured Parties; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 203, 7/17/15]
- l) Objection of Official Committee of Unsecured Creditors to Motion of Debtors for Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 365 and 507 of Bankruptcy Code: (I) Authorizing Debtors to Obtain Superpriority Secured Debtor in Possession Financing; (II) Authorizing Debtors to Use Cash Collateral; (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 211, 7/17/15]
- m) Supporting 10% Noteholders's Objection to Oaktree's Final DIP Financing [D.I. 212, 7/17/15]
- n) Notice of Filing of Expert Valuation Report for Molycorp, Inc. Prepared by Houlihan Lokey Capital, Inc. Filed in Support of the Supporting 10% Noteholders' Objection to Oaktree's Final DIP Financing [D.I. 213, 7/17/15]
- o) Notice of Filing of Revised Proposed DIP Budget [D.I. 240, 7/18/15]**

- p) **Reply of Debtors to Objections to Motion of the Debtors for Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 365 and 507 of the Bankruptcy Code (I) Authorizing Debtors to Obtain Superpriority Secured Debtor in Possession Financing; (II) Authorizing Debtors to Use Cash Collateral; (II) Granting Adequate Protection to Prepetition Secured Parties; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 241, 7/19/15]**
- q) **[Redacted] OCM MLYCo CTB Ltd.'s Responses to Objections to the Debtors Motion for DIP Financing [D.I. 242, 7/19/15]**
- r) **Motion for an Order Granting Debtors Leave and Permission to File Reply of the Debtors to Objections to Motion of the Debtors for Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364, 365 and 507 of the Bankruptcy Code (I) Authorizing Debtors to Obtain Superpriority Secured Debtor in Possession Financing; (II) Authorizing Debtors to Use Cash Collateral; (II) Granting Adequate Protection to Prepetition Secured Parties; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 243, 7/19/15]**
- s) **Expedited Motion of OCM MLYCo CTB Ltd. to File Under Seal Certain Exhibits to, and Redacted Portions of, OCM MLYCo CTB Ltd.'s Responses to Objections to the Debtors Motion for DIP Financing [D.I. 245, 7/19/15]**
- t) **Motion of OCM MLYCo CTB Ltd. for an Order Granting Leave and Permission to File OCM MLYCo CTB Ltd.'s Responses to Objections to the Debtors Motion for DIP Financing [D.I. 246, 7/19/15]**
- u) **[SEALED] OCM MLYCo CTB Ltd.'s Responses to Objections to the Debtors Motion for DIP Financing [D.I. 247, 7/19/15]**
- v) **Notice Of Proposed Final DIP Financing Filed In Support Of The Supporting 10% Noteholders Objection To Oaktree's Final DIP Financing [D.I. 248, 7/19/15]**

Status: This matter is going forward.

Dated: July 20, 2015
Wilmington, Delaware

/s/ Edmon L. Morton
M. Blake Cleary (No. 3614)
Edmon L. Morton (No. 3856)
Justin H. Rucki (No. 5304)
Ashley E. Jacobs (No. 5635)
YOUNG CONAWAY STARGATT & TAYLOR LLP
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253

-and-

Paul D. Leake
Lisa Laukitis
JONES DAY
222 East 41st Street
New York, New York 10017
Telephone: (212) 326-3939
Facsimile: (212) 755-7306

Ryan T. Routh
JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212

PROPOSED ATTORNEYS FOR DEBTORS