

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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In re : Chapter 11
:
MOLYCORP, INC., *et al.*,¹ : Case No. 15-11357 (CSS)
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Debtors. : (Jointly Administered)
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**FOURTH² AMENDED NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON JULY 2, 2015 AT 9:30 A.M. (ET)**

**AT THE DIRECTION OF THE COURT THE HEARING
TIME HAS BEEN CHANGED TO 10:30 A.M.**

CONTESTED MATTERS GOING FORWARD:

1. 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: At the Hearing

Related Pleadings:

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 Calco 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.

- 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) Notice of Continued Hearing [D.I. 93, 6/26/15]

Objections/Responses Received: None at this time
Status: The Debtors are in discussions with the parties per the Court's June 26, 2015 ruling. This matter is going forward.

- 2. Motion of the Debtors for Interim and Final Orders Pursuant to Sections 105, 361, 362, 363, 364 and 507 of the Bankruptcy Code: (I) Authorizing Debtors to Obtain Superpriority Secured Debtor in Possession Financing; (II) Authorizing the Debtors to Use Cash Collateral; (III) Approving the Backstop Commitment Letter; (IV) Approving Procedures for the Solicitation of Secured Noteholders to Participate in Debtor in Possession Financing; (V) Granting Adequate Protection to Prepetition Secured Parties; (VI) Scheduling a Final Hearing; and (VII) Granting Related Relief [D.I. 18, 6/25/15]

Response/Objection Deadline: At the Hearing

Related Pleadings:

- a) Notice of Continued Hearing [D.I. 93, 6/26/15]

Objections/Responses Received:

- b) OCM MLYCo CTB Ltds (I) Objection To Debtors Motion For Interim and Final Orders (A) Authorizing Debtors to Obtain Superpriority Secured Debtor-In-Possession Financing, (B) Authorizing Debtors to Use Cash Collateral, (C) Granting Adequate Protection to the Prepetition Secured Parties, (D) Scheduling a Final Hearing, and (E) Granting Related Relief, (II) Objection to Other First Day Relief and (III) Request for Adequate Protection [D.I. 41, 6/25/15]
- c) Reservation of Rights and Limited Response 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 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) Authorizing Debtors to Assume the Backstop Agreement, (IV) Approving Procedures for the Solicitation of Participation in Debtor in Possession Financing, (V) Granting Adequate Protection to the Prepetition Secured Parties, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [D.I. 44, 6/25/15]

Status: This matter will be addressed in connection with Matter No. 3.

ADDITIONAL MATTER:

3. 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. 109, 7/1/15]

Response/Objection Deadline: At the Hearing

Related Pleadings: None

Objections/Responses Received:

a) Supporting 10% Noteholders' Preliminary Objection to Oaktree DIP Financing [D.I. 122, 7/2/15]

Status: This matter is going forward.

Dated: July 2, 2015

Wilmington, Delaware

/s/ Edmon L. Morton

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