

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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In re : Chapter 11
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MOLYCORP, INC., *et al.*,¹ : Case No. 15-11357 (CSS)
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Debtors. : (Jointly Administered)
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**AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON SEPTEMBER 15, 2015 AT 11:00 A.M. (ET)**

ADJOURNED MATTER:

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. for the Official Committee of Unsecured Creditors)

Related Pleadings: None

Objections/Responses Received:

- a) Informal Response from the United States Trustee

Status: This matter is adjourned to November 16, 2015 at 10:00 a.m. (ET).

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.

MATTERS GOING FORWARD – CERTIFICATIONS FILED:

2. Motion of Official Committee of Unsecured Creditors for Order, Under Bankruptcy Code Sections 105(a), 107(b), 1102(b)(3) and 1103 and Bankruptcy Rule 9018, (I) Clarifying Scope of and Establishing Procedures in Connection with Creditor Access to Information and (II) Retaining Kurtzman Carson Consultants LLC, as Information Services Agent in Connection Therewith [D.I. 461, 8/24/15]

Response/Objection Deadline: September 8, 2015 at 4:00 p.m. (ET)

Related Pleadings:

- a) Certification of No Objection Regarding Motion of Official Committee of Unsecured Creditors for Order, Under Bankruptcy Code Sections 105(a), 107(b), 1102(b)(3) and 1103 and Bankruptcy Rule 9018, (I) Clarifying Scope of and Establishing Procedures in Connection with Creditor Access to Information and (II) Retaining Kurtzman Carson Consultants LLC, as Information Services Agent in Connection Therewith [D.I. 525, 9/10/15]

Objections/Responses Received: None

Additional Pleadings:

- b) Order, Under Bankruptcy Code Sections 105(a), 107(b), 1102(b)(3) and 1103 and Bankruptcy Rule 9018, (I) Clarifying Scope of and Establishing Procedures in Connection with Creditor Access to Information and (II) Retaining Kurtzman Carson Consultants LLC, as Information Services Agent in Connection Therewith [D.I. 537, 9/11/15]**

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

3. Second Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts and (II) Granting Certain Related Relief [D.I. 464, 8/25/15]

Response/Objection Deadline: September 8, 2015 at 4:00 p.m. (ET)

Related Pleadings:

- a) Certification of No Objection Regarding Docket No. 464 [D.I. 524, 9/10/15]

Objections/Responses Received: None

Additional Pleadings:

- b) Second Omnibus Order (I) Authorizing the Debtors to Reject Certain Executory Contracts and (II) Granting Certain Related Relief [D.I. 536, 9/11/15]**

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

4. Motion of the Debtors for an Order Approving Their Key Employee Retention Plan [D.I. 474, 8/27/15]

Response/Objection Deadline: September 8, 2015 at 4:00 p.m. (ET)
(extended to September 10, 2015 at 4:00 p.m. for OCM MLYCo CTB Ltd. and September 9, 2015 at 4:00 p.m. for the Official Committee of Unsecured Creditors)

Related Pleadings:

- a) [Sealed] Declaration of Stephen Kline in Support of the Motion of Debtors for an Order Approving Their Key Employee Retention Plan [D.I. 477, 8/27/15]
- b) Certification of Counsel Regarding Order Approving the Debtors' Key Employee Retention Plan [D.I. 528, 9/11/15]

Objections/Responses Received:

- c) Informal Response from OCM MLYCo CTB Ltd.
- d) Informal Response from the Official Committee of Unsecured Creditors

Additional Pleadings:

- e) **Order Approving the Debtors' Key Employee Retention Plan [D.I. 538, 9/11/15]**

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

5. Motion of Debtors, Pursuant to Section 107(b) of the Bankruptcy Code and Bankruptcy Rule 9018, for an Order Authorizing Them to File Under Seal Declarations in Support of (A) the Motion of Debtors for an Order Approving (I) a Key Employee Incentive Program, (II) Cash Bonus Incentive Payments for Certain Employees and (III) Certain Related Relief and (B) the Motion of Debtors for an Order Approving Their Key Employee Retention Plan [D.I. 476, 8/27/15]

Response/Objection Deadline: September 8, 2015 at 4:00 p.m. (ET)

Related Pleadings:

- a) Re-Notice of Motions [D.I. 488, 9/1/15]
- b) Certification of Counsel Regarding Order Approving the Motion of Debtors, Pursuant to Section 107(b) of the Bankruptcy Code and Bankruptcy Rule 9018, for an Order Authorizing Them to File Under Seal the Declaration in Support of the Motion of the Debtors for an Order Approving Their Key Employee Retention Plan [D.I. 530, 9/11/15]

Objections/Responses Received: None

Additional Pleadings:

- c) Order Approving the Motion of Debtors, Pursuant to Section 107(b) of the Bankruptcy Code and Bankruptcy Rule 9018, for an Order Authorizing Them to File Under Seal the Declaration in Support of the Motion of the Debtors for an Order Approving Their Key Employee Retention Plan [D.I. 539, 9/11/15]**

Status: An order has been entered granting the relief requested solely as it relates to the Debtors' Key Employee Retention Plan. This matter has been adjourned to October 1, 2015 as it relates to the Debtors' Key Employee Incentive Program.

MATTERS GOING FORWARD:

6. Debtors' Motion for an Order Modifying the Automatic Stay to Permit Payment of Defense Costs and Settlements Under Certain Insurance Policies [D.I. 473, 8/27/15]

Response/Objection Deadline: September 8, 2015 at 4:00 p.m. (ET)
(extended to September 10, 2014 at 11:00 a.m. for Official Committee of Unsecured Creditors)

Related Pleadings: None

Objections/Responses Received:

- a) Informal Response from National Union Fire Insurance Company of Pittsburg, Pa
- b) Informal Response from the Director and Officer Defendants
- c) Informal Response from the Official Committee of Unsecured Creditors
- d) Informal Response from OCM MLYCo CTB Ltd.**
- e) **Informal Response from Certain Holders of the Molycorp, Inc. 10% Senior Secured Notes**
- f) **Certification of Counsel Regarding Order Granting Limited Modification of the Automatic Stay to Permit Payment of Defense Costs and Settlements Under Insurance Policies [D.I. 542, 9/11/15]**
- g) **Order Granting Limited Modification of the Automatic Stay to Permit Payment of Defense Costs and Settlements Under Certain Insurance Policies [D.I. 544, 9/14/15]**

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

7. Motion of Official Committee of Unsecured Creditors for Entry of Order Under Bankruptcy Rule 2004 Authorizing Discovery with Respect to McKinsey & Company [D.I. 502, 9/4/15]

Response/Objection Deadline: September 11, 2015 at Noon

Related Pleadings:

- a) [Sealed] Motion of Official Committee of Unsecured Creditors for Entry of Order Under Bankruptcy Rule 2004 Authorizing Discovery with Respect to McKinsey & Company [D.I. 503, 9/4/05]

Objections/Responses Received: None

Additional Pleadings:

- b) Certification of Counsel Regarding Motion of Official Committee of Unsecured Creditors for Entry of Order Under Bankruptcy Rule 2004 Authorizing Discovery with Respect to McKinsey & Company [D.I. 531, 9/11/15]**
- c) Order Approving Stipulation Regarding Motion of Official Committee of Unsecured Creditors For Entry of Order Under Bankruptcy Rule 2004 Authorizing Discovery with Respect to McKinsey & Company [D.I. 533, 9/11/15]**
- d) Notice of Withdrawal [D.I. 543, 9/14/15]**

Status: The motion has been withdrawn. An order has been entered with respect to the related stipulation. No hearing is necessary.

8. Motion for Entry of an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal (I) an Unredacted Version of the Motion of Official Committee of Unsecured Creditors for Entry of an Order Under Bankruptcy Rule 2004 Authorizing Discovery With Respect to McKinsey & Company and (II) Exhibits A and C Through F to the Rule 2004 Motion [D.I. 504, 9/4/15]

Response/Objection Deadline: At the hearing

Related Pleadings:

- a) Order Granting Motion of Official Committee of Unsecured Creditors for Order Shortening Notice Period Regarding the Motion for Entry of an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal (I) an Unredacted Version of the Motion of Official Committee of Unsecured Creditors for Entry of an Order Under Bankruptcy Rule 2004 Authorizing Discovery With Respect to McKinsey & Company and (II) Exhibits A and C Through F to the Rule 2004 Motion [D.I. 509, 9/8/15]

- b) Notice of Hearing Regarding Motion for Entry of an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal (I) an Unredacted Version of the Motion of Official Committee of Unsecured Creditors for Entry of an Order Under Bankruptcy Rule 2004 Authorizing Discovery With Respect to McKinsey & Company and (II) Exhibits A and C Through F to the Rule 2004 Motion [D.I. 510, 9/8/15]

Objections/Responses Received:

None at this time

Additional Pleadings:

- c) Notice of Withdrawal [D.I. 543, 9/14/15]

Status: A Notice of Withdrawal has been filed. No hearing is necessary.

CONTESTED MATTER GOING FORWARD:

- 9. Third Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts and (II) Granting Certain Related Relief [D.I. 465, 8/25/15]

Response/Objection Deadline:

September 8, 2015 at 4:00 p.m. (ET)

Related Pleadings:

- a) Reply of Debtors to Limited Objection of Veolia Water North America Operating Services, LLC to Debtors' Third Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts and (II) Granting Certain Related Relief [D.I. 528, 9/11/15]

Objections/Responses Received:

- b) Limited Objection of Veolia Water North America Operating Services, LLC to Debtors' Third Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts and (II) Granting Certain Related Relief [D.I. 513, 9/8/15]
- c) Declaration of Van A. Cates, Esq. in Support of the Limited Objection of Veolia Water North America Operating Services, LLC to Debtors' Third Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts and (II) Granting Certain Related Relief [D.I. 514, 9/8/15]
- d) Exhibit E to Declaration of Van A. Cates, Esq. in Support of the Limited Objection of Veolia Water North America Operating Services, LLC to Debtors' Third Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts and (II) Granting Certain Related Relief [D.I. 515, 9/8/15]

Status: This matter is going forward.

Dated: September 14, 2015
Wilmington, Delaware

/s/ Edmon L. Morton
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