

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE

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

**UNCONTESTED MATTER WITH CERTIFICATION OF COUNSEL**

1. 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), extended for certain parties to September 25, 2015

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 Declarations in Support of the Motion of the Debtors for an Order Approving Their Key Employee Incentive Plan [D.I. 605, 9/29/15]

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<sup>1</sup> 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.

Objections/Responses Received:

Status: An order has been entered granting the relief requested solely as it relates to the declaration in support of the Debtors' Key Employee Retention Plan. A revised order has been submitted under certification of counsel as it relates to the declarations in support of the Debtors' Key Employee Incentive Program. No hearing is required.

**CONTESTED MATTERS GOING FORWARD**

2. Motion of the Debtors for an Order Approving (I) a Key Employee Incentive Program, (II) Cash Bonus Incentive Payments for Certain Employees and (III) Certain Related Relief [D.I. 475, 9/1/15]

Response/Objection Deadline: September 8, 2015 at 4:00 p.m. (ET), extended for certain parties to September 25, 2015

Related Pleadings:

- A. [SEALED] Declaration of Stephen Kline in Support of the Motion for an Order Approving (I) a Key Employee Incentive Program, (II) Cash Bonus Incentive Payments for Certain Employees and (III) Certain Related Relief [D.I. 478, 9/1/15]
- B. [SEALED] Declaration of Kevin Haggard in Support of the Motion for the Debtors for an Order Approving (I) a Key Employee Incentive Program, (II) Cash Bonus Incentive Payments for Certain Employees and (III) Certain Related Relief [D.I. 479, 9/1/15]
- C. Re-Notice of Motions [D.I. 488, 9/1/15]
- D. Motion for an Order Granting Debtors' Leave and Permission to File Reply of Debtors to Objections to 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 [D.I. 607, 9/29/15]
- E. [REDACTED] Reply of Debtors to Objections to 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 [D.I. 608, 9/29/15]
- F. [SEALED] Reply of Debtors to Objections to 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 [D.I. 609, 9/29/15]

Objections/Responses Received:

- A. United States Trustee's Objection to Motion of Debtors Approving (I) a Key Employee Incentive Program, (II) Cash Bonus Incentive Payments for Certain Employees and (III) Certain Related Relief [D.I. 583, 9/25/15]
- B. Objection of the United Steelworkers to Motion of Debtors Approving (I) a Key Employee Incentive Program, (II) Cash Bonus Incentive Payments for Certain Employees and (III) Certain Related Relief [D.I. 584, 9/25/15]
- C. [SEALED] Objection of Official Committee of Unsecured Creditors to Motion of Debtors Approving (I) a Key Employee Incentive Program, (II) Cash Bonus Incentive Payments for Certain Employees and (III) Certain Related Relief [D.I. 585, 9/25/15]
- D. [SEALED] Appendix in Support of the Objection of the Official Committee of Unsecured Creditors [SEALED] Objection of Official Committee of Unsecured Creditors to Motion of Debtors Approving (I) a Key Employee Incentive Program, (II) Cash Bonus Incentive Payments for Certain Employees and (III) Certain Related Relief [D.I. 586, 9/25/15]
- E. Joinder of Ad Hoc 10% Noteholders to Objection of Official Committee of Unsecured Creditors to Motion of Debtors Approving (I) a Key Employee Incentive Program, (II) Cash Bonus Incentive Payments for Certain Employees and (III) Certain Related Relief [D.I. 589, 9/25/15]
- F. [REDACTED] Objection of Official Committee of Unsecured Creditors to 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 [D.I. 597, 9/28/15]

Status: This matter will be going forward.

- 3. Motion for Entry of an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal (A) an Unredacted Version of the Objection to Motion of Debtors Approving (I) a Key Employee Incentive Program, (II) Cash Bonus Incentive Payments for Certain Employees and (III) Certain Related Relief and (B) the Appendix in Support of the Objection [D.I. 587, 9/25/15]

Objection Deadline: October 1, 2015 at 11:00 a.m. (ET)

Related Document:

- A. Order Granting Motion of the 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 (A) an Unredacted Version of the Objection to Motion of Debtors Approving (I) a Key Employee Incentive Program, (II) Cash Bonus Incentive Payments for

Certain Employees and (III) Certain Related Relief and (B) the Appendix in Support of the Objection [D.I. 593, 9/28/15]

Objections Filed: None to date

Status: This matter will be going forward.

Dated: September 29, 2015  
Wilmington, Delaware

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