

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

	X	
	:	
In re	:	Chapter 11
	:	
MOLYCORP, INC., <i>et al.</i> , ¹	:	Case No. 15-11357 (CSS)
	:	
Debtors.	:	(Jointly Administered)
	:	
	X	

**NOTICE OF SECOND AMENDED² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON OCTOBER 19, 2015 AT 12:30 P.M. (ET)**

PLEASE NOTE THE TIME OF THE HEARING HAS BEEN CHANGED TO 12:30 P.M. (ET) AT THE DIRECTION OF THE COURT.

UNCONTESTED MATTERS WITH CERTIFICATIONS FILED

1. Debtors’ Motion for an Order Extending the Time to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to Section 365(d)(4) of the Bankruptcy Code [D.I. 596, 9/28/15]

Response/Objection Deadline: October 13, 2015 at 11:00 a.m. (ET)

Related Pleadings:

- a) Certification of Counsel [D.I. 682, 10/15/15]

Objections/Responses Received:

- a) Informal Response of the Official Committee of Unsecured Creditors

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 **The time of the hearing has changed to 12:30 p.m. (ET) at the direction of the Court.**

Status: A revised form of order has been submitted under certification of counsel. No hearing is required.

2. Fourth Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts and (II) Granting Certain Related Relief [D.I. 621, 9/30/15]

Response/Objection Deadline: October 13, 2015 at 11:00 a.m. (ET)

Related Documents:

- a) Certification of Counsel [D.I. 683, 10/15/15]

Objections/Responses Received:

- a) Informal Response of SAP America, Inc.

Status: The informal response of SAP America, Inc. has been resolved. A revised form of order has been submitted under certification of counsel. No hearing is required.

UNCONTESTED MATTER GOING FORWARD

3. Motion for the Entry of an Order Granting Kern River Gas Transmission Company: (I) Relief from the Automatic Stay, Pursuant to 11 U.S.C. Section 362(d), to the Extent the Automatic Stay Applies, to Exercise (a) Rights Pursuant to Contract, (b) Recoupment and/or Setoff Rights and/or (c) UCC Security Interest Rights; and (II) Related Relief [D.I. 600, 9/28/15]

Response/Objection Deadline: Proposed for November 11, 2015 at 4:00 p.m. (ET)

Related Document:

- a) Notice of Filing of Stipulation and Agreed Order Establishing a Discovery and Litigation Schedule and Granting Limited Relief From the Automatic Stay to Kern River Gas Transmission Company [D.I. 685, 10/15/15]

Objections/Responses Received: None

Status: The Debtors, the Creditors' Committee and Kern River have agreed upon a form of stipulation that would result in partial relief from the automatic stay for Kern River and would otherwise adjourn the hearing on the matter to an omnibus hearing scheduled for January 2016 for a preliminary hearing before the Court. The proposed stipulation has been filed with the Court. This matter is going forward solely with respect to the relief requested in the proposed stipulation.

CONTESTED MATTERS GOING FORWARD

4. Debtors' Motion for an Order, Pursuant to Sections 105, 363 and 364 of the Bankruptcy Code, Authorizing Debtors to Renew or Cause the Issuance of Certain Surety Bonds with Lexon Insurance Company and Ironshore Indemnity Inc. [D.I. 603, 9/28/15]

Response/Objection Deadline: October 13, 2015 at 11:00 a.m. (ET) (extended for the Official Committee of Unsecured Creditors to October 14, 2015 at 4:00 p.m. (ET))

Related Document:

- a) Reply of Debtors to Objection to Debtors' Motion for an Order, Pursuant to Sections 105, 363 and 364 of the Bankruptcy Code, Authorizing Debtors to Renew or Cause the Issuance of Certain Surety Bonds with Lexon Insurance Company and Ironshore Indemnity Inc. [D.I. 692, 10/16/15]
- b) Motion for Leave and Permission to File Reply of Debtors to Objection to Debtors' Motion for an Order, Pursuant to Sections 105, 363 and 364 of the Bankruptcy Code, Authorizing Debtors to Renew or Cause the Issuance of Certain Surety Bonds With Lexon Insurance Company and Ironshore Indemnity Inc. [D.I. 693, 10/16/15]

Objections/Responses Received:

- a) Statement in Opposition to Debtors' Motion for an Order, Pursuant to Sections 105, 363 and 364 of the Bankruptcy Code, Authorizing Debtors to Renew or Cause the Issuance of Certain Surety Bonds with Lexon Insurance Company and Ironshore Indemnity Inc. [D.I. 667, 10/13/15]
- b) Preliminary Objection of Official Committee of Unsecured Creditors to Debtors' Motion for an Order, Pursuant to Sections 105, 363 and 364 of the Bankruptcy Code, Authorizing Debtors to Renew or Cause the Issuance of Certain Surety Bonds with Lexon Insurance Company and Ironshore Indemnity Inc. [D.I. 679, 10/14/15]

Status: The response listed as item (a) has been resolved. This matter will be going forward with respect to the response listed as item (b).

5. Motion of the County of San Bernardino, California, to Determine the Inapplicability of the Automatic Stay or, in the Alternative, for Relief from the Automatic Stay [D.I. 613, 9/29/15]

Response/Objection Deadline: October 13, 2015 at 4:00 p.m. (ET) (extended for the Debtors and Official Committee of Unsecured Creditors to October 14, 2015 at 4:00 p.m. (ET))

Related Documents:

- a) Declaration of George H. Kenline in Support of Motion of the County of San Bernardino, California, to Determine the Inapplicability of the Automatic Stay or, in the Alternative, for Relief from the Automatic Stay [D.I. 615, 9/29/15]
- b) Notice of Violation, Insufficient Financial Assurances, Issued by the Count of San Bernardino, California, Regarding the Debtors' Mountain Pass Mine [D.I. 618, 9/30/15]

Objections/Responses Received:

- a) Debtors' Objection to Motion of the County of San Bernardino, California to Determine the Inapplicability of the Automatic Stay or, in the Alternative, for Relief from the Automatic Stay [D.I. 677, 10/14/15]
- b) Declaration of James S. Allen in Support of Debtors' Objection to Motion of the County of San Bernardino, California to Determine the Inapplicability of the Automatic Stay or, in the Alternative, for Relief from the Automatic Stay [D.I. 678, 10/14/15]
- c) Objection of Official Committee of Unsecured Creditors to Motion of County of San Bernardino, California to Determine the Inapplicability of the Automatic Stay or, in the Alternative, for Relief from the Automatic Stay [D.I. 680, 10/14/15]

Status: This matter will be going forward.

- 6. Motion of the Official Committee of Unsecured Creditors for an Order Under Bankruptcy Rule 2004 Compelling Discovery From OCM MLYCo. CTB Ltd. and Its Affiliates [D.I. 664, 10/12/15]

Response/Objection Deadline: October 16, 2015 at 2:00 p.m. (ET)

Related Documents:

- a) Order Granting Motion of Official Committee of Unsecured Creditors for Order Shortening Notice Period Regarding the Motion of the Official Committee of Unsecured Creditors for an Order Under Bankruptcy Rule 2004 Compelling Discovery From OCM MLYCo. CTB Ltd. and Its Affiliates [D.I. 668, 10/13/15]
- b) Notice of Hearing Regarding Motion of Official Committee of Unsecured Creditors for an Order Under Bankruptcy Rule 2004 Compelling Discovery From OCM MLYCo. CTB Ltd. and Its Affiliates [D.I. 669, 10/13/15]

Objections/Responses Received:

- a) OCM MLYCo CTB Ltd.'s Objection to the Motion of the Official Committee of Unsecured Creditors for an Order Under Bankruptcy Rule 2004 Compelling Discovery From OCM MLYCo. CTB Ltd. and Its Affiliates [D.I. 690, 10/16/15]
- b) Declaration of Aaron L. Renenger in Support of the Objection of OCM MLYCo CTB Ltd. [D.I. 691, 10/16/15]

Status: This matter will be going forward.

Dated: October 16, 2015
Wilmington, Delaware

/s/ Ashley E. Jacobs
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

ATTORNEYS FOR DEBTORS