

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

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

**NOTICE OF AMENDED<sup>2</sup> AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON NOVEMBER 16, 2015 AT 10:00 A.M. (ET)**

**RESOLVED/WITHDRAWN MATTERS**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 for the United States Trustee and Official Committee of Unsecured Creditors

Related Document:

- a) Notice of Withdrawal [D.I. 769, 11/9/15]

Objections/Responses Received: None

Status: This matter has been withdrawn.

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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 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.

<sup>2</sup> **Amendments appear in bold.**

2. Second Motion of Debtors for Entry of an Order Authorizing Pension Contributions to a Legacy Defined Benefit Pension Plan [D.I. 721, 10/22/15]

Response/Objection Deadline: November 5, 2015 at 4:00 p.m. (ET)

Related Documents:

- a) Second Order Authorizing Pension Contributions to a Legacy Defined Benefit Pension Plan [D.I. 782, 11/10/15]

Objections/Responses Received: None

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

### **UNCONTESTED MATTER WITH CERTIFICATION OF COUNSEL**

3. Motion of Consolidated Electrical Distributors, Inc. for an Order Allowing Administrative Expense Claim and Directing Payment Thereof Pursuant to 11 U.S.C. §§ 503(a), 503(b)(9) and 546(c) [D.I. 681, 10/14/15]

Response/Objection Deadline: November 9, 2015 at 4:00 p.m. (ET)

Related Document:

- a) Certification of Counsel [D.I. 791, 11/11/15]
- b) **Order Relating to Motion of Consolidated Electrical Distributors, Inc. for an Order Allowing Administrative Expense Claim and Directing Payment Thereof Pursuant to 11 U.S.C. §§ 503(a), 503(b)(9) and 546(c) [D.I. 681 [D.I. 796, 11/12/15]**

Objections/Responses Received: None

Status: **An order has been entered.** No hearing is required.

### **UNCONTESTED MATTERS GOING FORWARD**

4. Ad Hoc 10% Noteholders' Motion to File Under Seal Unredacted Version of Exhibit B to Ad Hoc 10% Noteholders Objection to Extension of Exclusivity and Cross-Motion for Termination of Exclusivity [D.I. 764, 11/6/15]

Response/Objection Deadline: November 13, 2015 at 12:00 p.m. (ET)

Responses Received: None to date

Status: This matter will be going forward.

5. Motion for Entry of an Order Authorizing Official Committee of Unsecured Creditors to File Under Seal (A) Unredacted Version of (I) Objection of Official Committee of Unsecured Creditors to Debtors' Motion for Order Extending Exclusive Periods to File Chapter 11 Plan and Solicit Acceptances Thereof and (II) Cross-Motion to Terminate Exclusive Periods Immediately; (B) Exhibit B to Cross-Motion; and (C) Committee's Proposed Plan Term Sheet [D.I. 767, 11/6/15]

Requested Response/Objection Deadline: November 13, 2015 at 12:00 p.m.

Responses Received: None to date

Status: This matter will be going forward.

### **CONTESTED MATTERS GOING FORWARD**

6. Debtors' Motion for an Order Extending Their Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof [D.I. 716, 10/21/15]

Response/Objection Deadline: November 4, 2015 at 4:00 p.m. (ET), extended for certain parties to November 6, 2015 at 4:00 p.m. (ET)

Related Pleadings:

- a) Order Fixing Hearing Date and Shortening Time to Object or Respond to Ad Hoc 10% Noteholders (I) Objection to Extension of Exclusivity and Cross-Motion for Termination of Exclusivity and (II) Motion to File Under Seal Unredacted Version of Exhibit B to Ad Hoc 10% Noteholders Objection to Extension of Exclusivity and Cross Motion for Termination of Exclusivity [D.I. 775, 11/10/15]
- b) Order Granting Motion of Official Committee of Unsecured Creditors for Order Shortening Notice Period and Scheduling Hearing on (A) Cross-Motion to Terminate Exclusive Periods Immediately and (B) Motion for Entry of an Order Authorizing Official Committee of Unsecured Creditors to File Under Seal (A) Unredacted Version of (I) Objection of Official Committee of Unsecured Creditors to Debtors' Motion for Order Extending Exclusive Periods to File Chapter 11 Plan and Solicit Acceptances Thereof and (II) Cross-Motion to Terminate Exclusive Periods Immediately; (B) Exhibit to Cross-Motion; and (C) Committee's Proposed Plan Term Sheet [D.I. 776, 11/10/15]
- c) Notice of Hearing Regarding (I) Objection of Official Committee of Unsecured Creditors to Debtors' Motion for Order Extending Exclusive Periods to File Chapter 11 Plan and Solicit Acceptances Thereof and (II) Cross-Motion to Terminate Exclusive Periods Immediately [D.I. 777, 11/10/15]

- d) Notice of Hearing Regarding Motion for Entry of an Order Authorizing Official Committee of Unsecured Creditors to File Under Seal (A) Unredacted Version of (I) Objection of Official Committee of Unsecured Creditors to Debtors' Motion for Order Extending Exclusive Periods to File Chapter 11 Plan and Solicit Acceptances Thereof and (II) Cross-Motion to Terminate Exclusive Periods Immediately; (B) Exhibit to Cross-Motion; and (C) Committee's Proposed Plan Term Sheet [D.I. 778, 11/10/15]
- e) Notice of Hearing on (1) Ad Hoc 10% Noteholders' Objection to Extension of Exclusivity and Cross-Motion for Termination of Exclusivity and (2) Motion to File Under Seal Unredacted Version of Exhibit B to Ad Hoc 10% Noteholders Objection to Extension of Exclusivity and Cross-Motion for Termination of Exclusivity [D.I. 781, 11/10/15]
- f) **Debtors' (I) Objection to Cross-Motions for Termination of Exclusivity and (II) Statement in Support of Debtors' Motion for an Order Extending Their Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptance Thereof [D.I. 802, 11/13/15]**
- g) **Oaktree's (I) Response to the Objections of Official Committee of Unsecured Creditors and Ad Hoc 10% Noteholders to Extension of Debtors' Exclusivity and (II) Objection to Their Cross-Motions for Termination of Debtors' Exclusivity [D.I. 804, 11/13/15]**

Objections/Responses Received:

- a) [SEALED] (I) Objection of Official Committee of Unsecured Creditors to Debtors' Motion for Order Extending Exclusive Periods to File Chapter 11 Plan and Solicit Acceptances Thereof and (II) Cross-Motion to Terminate Exclusive Periods Immediately [D.I. 759, 11/6/15]
- b) Ad Hoc 10% Noteholders' Objection to Extension of Exclusivity and Cross-Motion for Termination of Exclusivity [D.I. 762, 11/6/15]
- c) [Redacted] (I) Objection of Official Committee of Unsecured Creditors to Debtors' Motion for Order Extending Exclusive Periods to File Chapter 11 Plan and Solicit Acceptances Thereof and (II) Cross-Motion to Terminate Exclusive Periods Immediately [D.I. 763, 11/6/15]
- d) [SEALED] Exhibit B to Ad Hoc 10% Noteholders Objection to Extension of Exclusivity [D.I. 765, 11/6/15]

Status: This matter will be going forward with respect to the motion and the cross-motions. The Debtors intend to reply to the objections and respond to the cross-motions in one consolidated pleading by the deadline established by the Court of November 13, 2015 at 12:00 p.m. (ET).

7. Motion of Debtors for Orders (A) Approving a Modified Key Employee Incentive Program and (B) Authorizing the Debtors to File Certain Information Regarding the Modified Key Employee Incentive Program Under Seal [D.I. 727, 10/26/15]

Response/Objection Deadline: November 9, 2015 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors to and the U.S. Trustee to November 12, 2015 at 10:00 a.m. (ET)

Related Document:

- a) [SEALED] Exhibit A to Motion of Debtors for Orders (A) Approving a Modified Key Employee Incentive Program and (B) Authorizing the Debtors to File Certain Information Regarding the Modified Key Employee Incentive Program Under Seal [D.I. 728, 10/26/15]
- b) **Notice of Further Revised KEIP and Reply of Debtors to Remaining Objections to Motion of Debtors for an Order Approving a Modified Key Employee Incentive Program [D.I. 798, 11/12/15]**
- c) **[SEALED] Notice of Further Revised KEIP and Reply of Debtors to Remaining Objections to Motion of Debtors for an Order Approving a Modified Key Employee Incentive Program [D.I. 799, 11/12/15]**
- d) **Motion for an Order Granting Debtors Leave and Permission to File Notice of Further Revised KEIP and Reply of Debtors to Remaining Objections to Motion of Debtors for an Order Approving a Modified Key Employee Incentive Program [D.I. 800, 11/12/15]**

Objections/Responses Received:

- a) Objection of Ad Hoc 10% Noteholders to Motion of Debtors for Orders (A) Approving a Modified Key Employee Incentive Program and (B) Authorizing the Debtors to File Certain Information Regarding the Modified Key Employee Incentive Program Under Seal [D.I. 771, 11/9/15]
- b) Objection of the United Steelworkers To Motion of Debtors for Orders (A) Approving a Modified Key Employee Incentive Program and (B) Authorizing the Debtors to File Certain Information Regarding the Modified Key Employee Incentive Program Under Seal [D.I. 779, 11/10/15]
- c) United States Trustee's Objection to Motion of Debtors for Order (A) Approving a Modified Key Employee Incentive Program, and (B) Authorizing the Debtors to File Certain Information Regarding the Modified Key Employee Incentive Program Under Seal [D.I. 794, 11/12/15]

Status: The Debtors have reached an agreement on further revisions to the KEIP that are supported by the Creditors' Committee, Oaktree and the Ad Hoc 10% Noteholders, and therefore resolve the objection filed by the Ad Hoc 10% Noteholders (Item A above). **The Debtors filed a reply in support of the motion that outlines the revisions to the KEIP agreed to with the Creditors' Committee, Oaktree and the Ad Hoc 10% Noteholders.** The matter is going forward with respect to Items B and C.

Dated: November 13, 2015  
Wilmington, Delaware

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