

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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**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON DECEMBER 18, 2015 AT 1:00 P.M. (ET)**

THIS HEARING WILL BE GOING FORWARD AS A TELEPHONIC HEARING ONLY. PARTIES WISHING TO ATTEND SHOULD MAKE ARRANGEMENTS THROUGH COURTCALL, 866-582-6878 AT LEAST ONE HOUR PRIOR TO THE HEARING.

ADJOURNED MATTERS

1. 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

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.

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]
- h) [SEALED] Plan of Reorganization Term Sheet of the Official Committee of Unsecured Creditors of Molycorp, Inc., et al. and the Ad Hoc 10% Noteholders [D.I. 812, 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 adjourned by agreement to January 8, 2016 at 10:00 a.m. (ET).

- 2. Motion of Debtors for an Order (A) Approving Bidding Procedures for the Sale of the Debtors' Assets, (B) Approving Certain Bidder Incentives in Connection with the Debtors' Entry into a Stalking Horse Agreement, if any and (C) Approving Procedures for the Assumption and Assignment of Executory Contracts and Unexpired Leases [D.I. 793, 11/11/15]

Objection Deadline: November 25, 2015 at 4:00 p.m. (ET), extended for the Committee, Committee Members, Westchester Fire Insurance Company, the Ad Hoc 10% Noteholders, and Indenture Trustee to Ad Hoc 10% Noteholders

Related Documents:

- a) Notice of Filing of Proposed Agreements [D.I. 857, 11/24/15]

Objections/Responses Received:

- a) Objection of the Pension Benefit Guaranty Corporation to Debtors' Motion [D.I. 855, 11/24/15]
- b) Ironshore Indemnity, Inc., Lexon Insurance Co. and Bond Safeguard Insurance Co.'s Objection to Motion of Debtors for an Order (A) Approving Bidding Procedures for the Sale of the Debtors' Assets, (B) Approving Certain Bidder Incentives in Connection with the Debtors' Entry into a Stalking Horse Agreement, if any and (C) Approving

Procedures for the Assumption and Assignment of Executory Contracts and Unexpired Leases [D.I. 856, 11/24/15]

- c) Objection of Westchester Fire Insurance Company to Debtors' Combined Motion for an Order (A) Approving Bidding Procedures for the Sale of the Debtors' Assets, (B) Approving Certain Bidder Incentives in Connection with the Debtors' Entry into a Stalking Horse Agreement, if any and (C) Approving Procedures for the Assumption and Assignment of Executory Contracts and Unexpired Leases and Form Asset Purchase Agreements [D.I. 870, 12/1/15]

Status: This matter will be adjourned by agreement to January 8, 2016 at 10:00 a.m. (ET).

- 3. Motion of Debtors for an Order (A) Approving Disclosure Statement, (B) Approving the Form and Manner of Service of Disclosure Statement Notice, (C) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan of Reorganization, (D) Scheduling Hearing on Confirmation of Plan of Reorganization and (E) Approving Procedures for the Assumption of Executory Contracts and Unexpired Leases [D.I. 836, 11/17/15]

Objection Deadline: December 1, 2015 at 4:00 p.m. (ET), extended for the U.S. Trustee, the Committee, Committee Members, Westchester Fire Insurance Company, the Ad Hoc 10% Noteholders and 10% Notes Indenture Trustee

Related Documents:

- a) Debtors' Joint Plan of Reorganization [D.I. 746, 11/3/15]
- b) Disclosure Statement for Debtors' Joint Plan of Reorganization [D.I. 747, 11/3/15]
- c) Notice of Hearing to Consider Adequacy of Disclosure Statement [D.I. 748, 11/3/15]
- d) [REDACTED] Notice of Filing of Certain Exhibits to Disclosure Statement and Information Relating to Debtors' Proposed Plan [D.I. 858, 11/24/15]
- e) [SEALED] Notice of Filing of Certain Exhibits to Disclosure Statement and Information Relating to Debtors' Proposed Plan [D.I. 859, 11/24/15]

Objections/Responses Received:

- a) Ironshore Indemnity, Inc., Lexon Insurance Co. and Bond Safeguard Insurance Co.'s Objection to Motion of Debtors for an Order (A) Approving Disclosure Statement, (B) Approving the Form and Manner of Service of Disclosure Statement Notice, (C) Establishing Procedures for

Solicitation and Tabulation of Votes to Accept or Reject Plan of Reorganization, (D) Scheduling Hearing on Confirmation of Plan of Reorganization and (E) Approving Procedures for the Assumption of Executory Contracts and Unexpired Leases [D.I. 866, 12/1/15]

- b) Memorandum of Law in Support of Ironshore Indemnity, Inc., Lexon Insurance Co. and Bond Safeguard Insurance Co.'s Objection to Motion of Debtors for an Order (A) Approving Disclosure Statement, (B) Approving the Form and Manner of Service of Disclosure Statement Notice, (C) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan of Reorganization, (D) Scheduling Hearing on Confirmation of Plan of Reorganization and (E) Approving Procedures for the Assumption of Executory Contracts and Unexpired Leases [D.I. 867, 12/1/15]
- c) Objection of the Pension Benefit Guaranty Corporation to Debtors' Proposed Disclosure Statement [D.I. 869, 12/1/15]
- d) Objection of Westchester Fire Insurance Company to Debtors' Motion for an Order (A) Approving Disclosure Statement, (B) Approving the Form and Manner of Service of Disclosure Statement Notice, (C) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan of Reorganization, (D) Scheduling Hearing on Confirmation of Plan of Reorganization and (E) Approving Procedures for the Assumption of Executory Contracts and Unexpired Leases [D.I. 874, 12/2/15]
- e) Acting United States Trustee's Omnibus Objection to Debtors' Disclosure Statement for Debtors' Joint Plan of Reorganization and Motion of Debtors for an Order (A) Approving Disclosure Statement, (B) Approving the Form and Manner of Service of Disclosure Statement Notice, (C) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan of Reorganization, (D) Scheduling Hearing on Confirmation of Plan of Reorganization and (E) Approving Procedures for the Assumption of Executory Contracts and Unexpired Leases [D.I. 903, 12/11/15]
- f) Limited Objection of 10% Notes Indenture Trustee to Debtors' Proposed Disclosure Statement and Solicitation Procedures and Reservation of Rights as to Plan [D.I. 907, 12/14/15]

Status: This matter will be adjourned by agreement to January 8, 2016 at 10:00 a.m. (ET).

- 4. Motion of Debtors, Pursuant to Sections 105(a) and 107(b) of the Bankruptcy Code and Bankruptcy Rules 9018, for an Order Authorizing Them to Temporarily File Under Seal Certain Exhibits and Information Relating to Their Proposed Plan and Related Disclosure Statement [D.I. 860, 11/24/15]

Objection Deadline: December 1, 2015 at 4:00 p.m. (ET), extended for the U.S. Trustee

Related Document:

- a) Order Shortening Notice of the Motion of Debtors, Pursuant to Sections 105(a) and 107(b) of the Bankruptcy Code and Bankruptcy Rules 9018, for an Order Authorizing Them to Temporarily File Under Seal Certain Exhibits and Information Relating to Their Proposed Plan and Related Disclosure Statement [D.I. 862, 11/25/15]

Objections/Responses Filed: None to date

Status: This matter will be adjourned by agreement to January 8, 2016 at 10:00 a.m. (ET).

CONTESTED MATTER GOING FORWARD

5. Motion of Official Committee of Unsecured Creditors for an Order Extending Period to (A) Challenge Among, Validity, or Enforceability of Claims of OCM MLYCO. CTB Ltd. And its Affiliates and (B) Assert Claims or Causes of Action Against OCM MLYCO. CTB Ltd. And its Affiliates [D.I. 845, 11/19/15]

Objection Deadline: December 1, 2015 at 4:00 p.m. (ET), extended for OCM MLYCO. CTB Ltd

Related Document:

- a) Amendment to Relief Requested in November 19, 2015 Motion of Official Committee of Unsecured Creditors for an Order Extending Period to (A) Challenge Among, Validity, or Enforceability of Claims of OCM MLYCO. CTB Ltd. And its Affiliates and (B) Assert Claims or Causes of Action Against OCM MLYCO. CTB Ltd. And its Affiliates [D.I. 897, 12/9/15]

Objections/Responses Filed:

- a) OCM MLYCO CTB Ltd.'s Limited Objection to the Motion of the Official Committee of Unsecured Creditors for an Order Extending its Challenge and Standing Periods [D.I. 904, 12/11/15]

Status: This matter will be going forward.

Dated: December 16, 2015
Wilmington, Delaware

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