

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re : Chapter 11

:

MOLYCORP, INC., *et al.*,¹ : Case No. 15-11357 (CSS)

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Debtors. : (Jointly Administered)

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: Requested Hearing Date: April 13, 2016 at 11:00 a.m. (ET)

: Objection Deadline: To be determined

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**NOTICE OF MOTION OF INDUSTRIAL MINERALS, LLC;
MOLYCORP ADVANCED WATER TECHNOLOGIES, LLC;
MOLYCORP MINERALS, LLC; PP IV MOUNTAIN PASS II, INC.;
PP IV MOUNTAIN PASS INC.; AND RCF SPEEDWAGON INC. FOR AN ORDER
(I) CONVERTING THEIR CHAPTER 11 CASES TO CASES UNDER CHAPTER 7,
(II) TERMINATING THE SERVICES OF PRIME CLERK LLC AS CLAIMS
AND NOTICING AGENT IN THEIR CASES, (III) AMENDING THE DEBTORS'
JOINT ADMINISTRATION ORDER AND (IV) GRANTING RELATED RELIEF**

TO: ALL KNOWN CREDITORS AND EQUITY SECURITY HOLDERS OF INDUSTRIAL MINERALS, LLC; MOLYCORP ADVANCED WATER TECHNOLOGIES, LLC; MOLYCORP MINERALS, LLC; PP IV MOUNTAIN PASS II, INC.; PP IV MOUNTAIN PASS INC.; AND RCF SPEEDWAGON INC.

PLEASE TAKE NOTICE that Industrial Minerals, LLC, Molycorp Advanced Water Technologies, LLC, Molycorp Minerals, LLC, PP IV Mountain Pass II, Inc., PP IV Mountain Pass Inc., and RCF Speedwagon Inc. (collectively, the “Molycorp Minerals Debtors”) have filed the *Motion of Industrial Minerals; Industrial Minerals, LLC; Molycorp Advanced Water Technologies, LLC; Molycorp Minerals, LLC; PP IV Mountain Pass II, Inc.; PP IV Mountain Pass Inc.; and RCF Speedwagon Inc. for an Order (I) Converting Their Chapter 11 Cases to Cases under Chapter 7 and (II) Terminating the Services of Prime Clerk LLC as Claims and Noticing Agent in Their Cases, (III) Amending the Debtors' Joint Administration Order and (IV) Granting Related Relief* (the “Conversion Motion”) [Docket No. 1581]. Through the Conversion Motion, the Molycorp Minerals Debtors seek to convert their chapter 11 bankruptcy

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).

cases to chapter 7 bankruptcy cases, and also seek certain related relief. You may obtain a copy of the Conversion Motion, for free, by (i) accessing the website maintained by the Debtors' claims and noticing agent, Prime Clerk LLC, at <http://cases.primeclerk.com/molycorp>, or (ii) request to Debtors' co-counsel via electronic mail to dlaskin@ycst.com.

PLEASE TAKE FURTHER NOTICE THAT THE MOLYCORP MINERALS DEBTORS HAVE REQUESTED THAT THE COURT HOLD A HEARING ON THE MOTION ON APRIL 13, 2016 AT 11:00 A.M. (ET) BEFORE THE HONORABLE CHRISTOPHER S. SONTCHI IN THE UNITED STATES BANKRUPTCY COURT, 824 NORTH MARKET STREET, 5TH FLOOR, COURTROOM NO. 6, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE that that any objections to the relief requested in the Motion must be filed **on or before a date and time to be subsequently determined by the Court** (the "Objection Deadline") with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801 and served on the undersigned counsel to the Debtors so as to be received on or before the Objection Deadline. Once set, the Objection Deadline will be noted in a separate notice to be filed in these chapter 11 cases and available for viewing on the website maintained by the Debtors' claims and noticing agent, Prime Clerk LLC, at <http://cases.primeclerk.com/molycorp>.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: April 8, 2016

/s/ Ashley E. Jacobs

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