

UNITED STATES BANKRUPTCY COURT
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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NOTICE OF SECOND AMENDED² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON MARCH 28, 2016 AT 2:30 P.M. (ET)

PLEASE NOTE THE TIME OF THE HEARING HAS BEEN CHANGED TO 2:30
P.M. (ET) WITH THE PERMISSION OF THE COURT.

ADJOURNED/RESOLVED MATTERS

- 1. [SEALED] First Omnibus Objection and Memorandum of Law of Official Committee of Unsecured Creditors to Claim No. 367 (Filed by Magnequench International, Inc. Against Molycorp, Inc.), Claim No. 368 (Filed by Magnequench, Inc. Against Molycorp, Inc.), Claim No. 391 (Filed by Molycorp, Inc. Against Molycorp Luxembourg Holdings S.à R.L.), Claim No. 427 (Filed by Molycorp Minerals Canada ULC Against MCP Exchangeco, Inc.), and Claim No. 435 (Filed by Molycorp, Inc. Against MCP Exchangeco, Inc.) (Substantive: Recharacterization and Disallowance) [D.I. 1234, 2/8/16]

Objection Deadline:

Related Documents:

- a) [REDACTED] First Omnibus Objection and Memorandum of Law of Official Committee of Unsecured Creditors to Claim No. 367 (Filed by

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 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 6400 South Fiddler's Green Circle, Suite 1610, Greenwood Village, Colorado 80111.

² Amendments appear in bold.

Magnequench International, Inc. Against Molycorp, Inc.), Claim No. 368 (Filed by Magnequench, Inc. Against Molycorp, Inc.), Claim No. 391 (Filed by Molycorp, Inc. Against Molycorp Luxembourg Holdings S.À R.L.), Claim No. 427 (Filed by Molycorp Minerals Canada ULC Against MCP Exchangeco, Inc.), and Claim No. 435 (Filed by Molycorp, Inc. Against MCP Exchangeco, Inc.) (Substantive: Recharacterization and Disallowance) [D.I. 1235, 2/8/16]

Objections Filed: None

Status: This matter will be addressed in connection with confirmation of the Debtors' Plan.

2. Motion for Order Authorizing Official Committee of Unsecured Creditors to File Under Seal (I) Unredacted Copy of First Omnibus Objection and Memorandum of Law of Official Committee of Unsecured Creditors to Claim No. 367 (Filed by Magnequench International, Inc., Against Molycorp, Inc.), Claim No. 368 (Filed by Magnequench, Inc. Against Molycorp, Inc.), Claim No. 391 (Filed by Molycorp, Inc. Against Molycorp Luxembourg Holdings S.À R.L.), Claim No. 427 (Filed by Molycorp Minerals Canada ULC Against MCP Exchangeco, Inc.), and Claim No. 435 (Filed by Molycorp, Inc. Against MCP Exchangeco, Inc.) (Substantive: Recharacterization and Disallowance) and (II) Exhibits B and C Attached Thereto [D.I. 1236, 2/8/16]

Objection Deadline: March 21, 2016 at 4:00 p.m. (ET)

Objections Filed: None

Status: This matter will be addressed in connection with confirmation of the Debtors' Plan.

3. Motion of Debtors for an Order Authorizing Them to Surcharge Certain Collateral Pursuant to Section 506(c) of the Bankruptcy Code [D.I. 1352, 3/7/16]

Objection Deadline: March 21, 2016 at 4:00 p.m. (ET)

Objections Filed:

- a) Sureties' Limited Objection and Reservation of Rights to Debtors' Motion for an Order Authorizing the Surcharge of Certain Collateral Pursuant to Section 506(c) of the Bankruptcy Code [D.I. 1423, 3/18/16]
- b) Objection of Wells Fargo Bank, National Association, as Collateral Agent, to Motion of Debtors for an Order Authorizing Them to Surcharge Certain Collateral Pursuant to Section 506(c) of the Bankruptcy Code [D.I. 1433, 3/21/16]
- c) Limited Objection of Westchester Fire Insurance Company to Debtors' Motion for an Order Authorizing the Surcharge of Certain Collateral Pursuant to 11 U.S.C. Section 506(c) [D.I. 1435, 3/21/16]

- d) Ad Hoc 10% Noteholders' Objection to the Motion of the Debtors for an Order Authorizing Them to Surcharge Certain Collateral Pursuant to Section 504(c) of the Bankruptcy Code [D.I. 1436, 3/21/16]

Status: This matter will be adjourned to March 29, 2016 at 10:00 p.m. (ET).

- 4. Third Motion of Debtors for Entry of an Order Authorizing Pension Contributions to a Legacy Defined Benefit Pension Plan [D.I. 1333, 3/3/16]

Objection Deadline: March 17, 2016 at 4:00 p.m. (ET)

Related Documents:

- a) Certificate of No Objection [D.I. 1430, 3/21/16]
- b) Third Order Authorizing Pension Contributions to a Legacy Defined Benefit Pension Plan [D.I. 1450, 3/22/16]

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

MATTERS GOING FORWARD

- 5. Motion for Estimation and Temporary Allowance of Claims of Westchester Fire Insurance Company Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Purposes of Accepting or Rejecting the Debtors' Joint Plan of Reorganization [D.I. 1347, 3/7/16]

Objection Deadline: March 23, 2016 at 4:00 p.m. (ET)

Related Document:

- a) Notice of Hearing [D.I. 1396, 3/11/16]
- b) **Westchester Fire Insurance Company's Response to Debtors' Omnibus Objection and Joinder of Official Committee of Unsecured Creditors [D.I. 1489, 3/25/16]**
- c) **Certification of Counsel Regarding Westchester Fire Insurance Company's Response to Debtors' Omnibus Objection and Joinder of Official Committee of Unsecured Creditors [D.I. 1497, 3/17/16]**

Objections Filed:

- a) Debtors' Omnibus Objection to (I) the Motion for Estimation and Temporary Allowance of Claims of Westchester Fire Insurance Company Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Purposes of Accepting or Rejecting the Debtors' Joint Plan of Reorganization and (II) the Motion of Ironshore Indemnity Inc., Lexon

Insurance Company and Bond Safeguard Insurance Company to Bankruptcy Rule 3018(a) for Temporary Allowance of Their Claims Solely for the Purposes of Voting on the Debtors' Proposed Plan of Reorganization and for Allowance of Administrative Claims [D.I. 1465, 3/23/16]

- b) Joinder of Official Committee of Unsecured Creditors to Debtors' Omnibus Objection to (I) the Motion for Estimation and Temporary Allowance of Claims of Westchester Fire Insurance Company Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Purposes of Accepting or Rejecting the Debtors' Joint Plan of Reorganization and (II) the Motion of Ironshore Indemnity Inc., Lexon Insurance Company and Bond Safeguard Insurance Company to Bankruptcy Rule 3018(a) for Temporary Allowance of Their Claims Solely for the Purposes of Voting on the Debtors' Proposed Plan of Reorganization and for Allowance of Administrative Claims [D.I. 1474, 3/23/16]

Status: This matter will be going forward.

- 6. Motion of Ironshore Indemnity Inc., Lexon Insurance Company and Bond Safeguard Insurance Company to Bankruptcy Rule 3018(a) for Temporary Allowance of Their Claims Solely for the Purposes of Voting on the Debtors' Proposed Plan of Reorganization and for Allowance of Administrative Claim [D.I. 1365, 3/9/16]

Objection Deadline: March 23, 2016 at 4:00 p.m. (ET)

Related Document:

- a) Order Shortening Notice Period With Respect to Motion for Temporary Allowance of Claim and Allowance of Administrative Claim [D.I. 1380, 3/10/16]
- b) **Ironshore Indemnity, Inc., Lexon Insurance Co., and Bond Safeguard Insurance Company's Response to Debtors' Omnibus Objection and Joinder of Official Committee of Unsecured Creditors [D.I. 1493, 3/25/16]**

Objections Filed:

- a) Debtors' Omnibus Objection to (I) the Motion for Estimation and Temporary Allowance of Claims of Westchester Fire Insurance Company Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Purposes of Accepting or Rejecting the Debtors' Joint Plan of Reorganization and (II) the Motion of Ironshore Indemnity Inc., Lexon Insurance Company and Bond Safeguard Insurance Company to Bankruptcy Rule 3018(a) for Temporary Allowance of Their Claims Solely for the Purposes of Voting on the Debtors' Proposed Plan of Reorganization and for Allowance of Administrative Claims [D.I. 1465, 3/23/16]

- b) Joinder of Official Committee of Unsecured Creditors to Debtors' Omnibus Objection to (I) the Motion for Estimation and Temporary Allowance of Claims of Westchester Fire Insurance Company Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Purposes of Accepting or Rejecting the Debtors' Joint Plan of Reorganization and (II) the Motion of Ironshore Indemnity Inc., Lexon Insurance Company and Bond Safeguard Insurance Company to Bankruptcy Rule 3018(a) for Temporary Allowance of Their Claims Solely for the Purposes of Voting on the Debtors' Proposed Plan of Reorganization and for Allowance of Administrative Claims [D.I. 1474, 3/23/16]

Status: This matter will be going forward.

Dated: March 27, 2016
Wilmington, Delaware

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