

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 AGENDA OF MATTERS SCHEDULED FOR
HEARING ON APRIL 4, 2016 AT 2:00 P.M. (ET)**

MATTERS GOING FORWARD

1. 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: March 9, 2016 at 5:00 p.m. (ET)

Related Documents:

- a) Notice of Filing of Proposed Agreements [D.I. 857, 11/24/15]
- b) Order (A) Approving Bidding Procedures for the Sale of the Debtors’ Assets, (B) Approving Certain Bidder Incentives in Connection with the Debtors’ Entry into Stalking Horse Agreement, if any and (C) Approving Procedures for the Assumption and Assignment of Executory Contracts and Unexpired Leases [D.I. 1095, 1/14/16]
- c) Notice of Debtors’ Intent to Assume and Potentially Assign Certain Executory Contracts and Unexpired Leases [D.I. 1231, 2/5/16]

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.

- d) Notice of Filing of Proposed Forms of: (I) Order (A) Approving Asset Purchase Agreement, (B) Approving the Sale of Certain Molycorp Minerals Assets to the Purchaser Free and Clear of All Liens, Claims, Encumbrances, and Other Interests Pursuant to Bankruptcy Code Section 105(a), 363(b), (f), (k), and (m), (C) Approving Assumption and Assignment of Certain Executory Contracts Free and Clear of All Liens, Claims, Encumbrances, and Other Interests Pursuant to Bankruptcy Code Sections 363 and 365, and (D) Granting Related Relief; and (II) Asset Purchase Agreement Among Molycorp, Inc., the Other Sellers Party Hereto, and Secure Natural Resources LLC [D.I. 1507, 3/28/16]

Objections/Responses Received:

- a) Reservation of Rights of the United Steelworkers to Notice of Debtors' Intent to Assume and Potentially Assign Certain Executory Contracts and Unexpired Leases [D.I. 1307, 2/24/16]
- b) Limited Objection and Reservation of Rights of SAP America, Inc. to the Assumption and/or Assignment of a Software License Agreement Between SAP America, Inc. and Molycorp, Inc. [D.I. 1308, 2/24/16]
- c) Objection of TIC – The Industrial Company to the Notice of Debtors' Intent to Assume and Potentially Assign Certain Executory Contracts and Unexpired Leases [D.I. 1309, 2/24/16]

Status: This matter was approved by the Court at a hearing held on March 30, 2016. This matter will be going forward only to the extent that the Court is needed to resolve any open issues on the form of order.

- 2. Debtors' Third Amended Joint Plan of Reorganization (Revised) [D.I. 1384, 3/11/16]

Objection Deadline: March 17, 2016 at 5:00 p.m. (ET)

Related Documents:

- a) Notice of Filing of Plan Debtors' Fourth Amended Joint Plan of Reorganization [D.I. 1503, 3/28/16]
- b) Notice of Filing of Proposed Findings of Fact, Conclusions of Law and Order Confirming the Plan Debtors' Fourth Amended Joint Plan of Reorganization [D.I. 1511, 3/28/16]

Status: This matter was approved by the Court at a hearing held on March 30, 2016. This matter will be going forward only to the extent that the Court is needed to resolve any open issues on the form of order.

Dated: March 31, 2016
Wilmington, Delaware

/s/ Edmon L. Morton
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