

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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**AMENDED² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON DECEMBER 19, 2016 AT 2:00 P.M. (ET)**

**SINCE NO MATTERS ARE GOING FORWARD THE HEARING HAS BEEN
CANCELLED AT THE DIRECTION OF THE COURT.**

RESOLVED/ADJOURNED MATTERS

1. Reorganized Plan Debtors’ Sixth Omnibus Objection (Substantive) to Proofs of Claim Nos. 551, 554, 558, 616 and 617 Filed by the Franchise Tax Board of the State of California [D.I. 2064, 11/18/16]

Response Deadline: December 2, 2016 at 4:00 p.m. (ET)

Related Documents:

- a) Certification of No Objection [D.I. 2077, 12/5/16]
- b) Notice of Submission of Copies of Proofs of Claim [D.I. 2078, 12/6/16]
- c) Order Granting Reorganized Plan Debtors’ Sixth Omnibus Objection (Substantive) to Proofs of Claim Nos. 551, 554, 558, 616 and 617 Filed by the Franchise Tax Board of the State of California [D.I. 2080, 12/12/16]

Responses Filed: None

¹ The Debtors are the following 15 entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Molycorp, Inc. (1797); Magnequench, Inc. (1833); Magnequench International, Inc. (7801); Magnequench Limited; 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 Rare Metals Holdings, Inc. (4615); Molycorp Rare Metals (Utah), Inc. (7445); Neo International Corp.

² **Amendments appear in bold.**

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

2. Reorganized Plan Debtors' Objection to Request and Application of National Union Fire Insurance Company of Pittsburgh, PA., Illinois National Insurance Company, American International Life Assurance of NY and Certain Other Affiliates of AIG Property Casualty, Inc. for Payment of an Administrative Expense Claim [D.I. 2050, 11/4/16]

Response Deadline: November 18, 2016 at 4:00 p.m. (ET)

Related Document:

- a) Order Sustaining Reorganized Plan Debtors' Objection to Request and Application of National Union Fire Insurance Company of Pittsburgh, PA., Illinois National Insurance Company, American International Life Assurance of NY and Certain Other Affiliates of AIG Property Casualty, Inc. for Payment of an Administrative Expense Claim [D.I. 2069, 11/28/16]

Responses Filed: None

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

3. Reorganized Plan Debtors' Motion for Entry of an Order (I) Estimating at \$0 (A) Proof of Claim No. 301 Filed by Ironshore Indemnity Inc. and Lexon Insurance Company/Bond Safeguard Insurance Company and (B) Proof of Claim No. 474 Filed By Westchester Fire Insurance Company for Purposes of Allowance and Distribution Under the Plan or, in the Alternative, (II) Allowing Such Claims at \$0 [D.I. 2065, 11/18/16]

Response Deadline: December 2, 2016 at 4:00 p.m. (ET)

Objections Filed: None

Status: This matter will be adjourned.

UNCONTESTED MATTERS WITH CERTIFICATION OF COUNSEL

4. Reorganized Debtors' Motion for Issuance of a Final Decree (I) Closing Certain Cases, (II) Waiving Requirement to File Final Report in Such Cases and (III) Granting Related Relief [D.I. 2072, 11/28/16]

Objection Deadline: December 12, 2016 at 4:00 p.m. (ET)

Related Documents:

- a) Post Confirmation Report [D.I. 2081, 12/13/16]
- b) Certification of Counsel [D.I. 2083, 12/15/16]

Objections Filed:

- c) Informal comments from the U.S. Trustee
- d) Informal comments from Paul Hastings LLP

Additional Related Document:

- e) **Final Decree (I) Closing Certain Cases, (II) Waiving Requirements to File Final Report in Such Cases and (III) Granting Related Relief [D.I. 2085, 12/15/16]**

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

CONTESTED MATTER GOING FORWARD

- 5. Third Interim and Final Fee Application of Paul Hastings LLP as Counsel to Official Committee of Unsecured Creditors for Period from July 8, 2015 Through and Including August 31, 2016 [D.I. 1984, 9/23/16]

Objection Deadline: October 31, 2016 at 4:00 p.m. (ET)

Related Documents:

- a) Documents Related to Uncontested Fees: See Schedule 1, attached, submitted to the Judge's chambers on December 12, 2016
- b) Reservation of Rights of Paul Hastings LLP with Respect to All Pending Final Fee Applications [D.I. 2040, 10/31/16]
- c) Omnibus Order Approving Final Fee Applications [D.I. 2074, 11/29/16]
- d) Documents Related to Contested Fees: See Schedule 2, attached. [The Debtors have not included copies of the documents listed in Schedule 2, as hard copies of these documents were submitted to the Court in advance of the July 26, 2016 hearing.]

Objections Filed:

- e) Oaktree's Objection to the Final Fee Application of Paul Hastings LLP and Response to the Supplement to Same [D.I. 2038, 10/31/16]

Status: **This matter will be adjourned at the direction of the Court to the next omnibus hearing after the Court has ruled on the Contested Fees previously taken under advisement.**

Dated: December 15, 2016
Wilmington, Delaware

/s/ Justin H. Rucki
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ATTORNEYS FOR REORGANIZED PLAN DEBTORS

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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In re : Chapter 11
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MOLYCORP, INC., *et al.*, : Case No. 15-11357 (CSS)
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Debtors. : (Jointly Administered)
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: **Hearing Date: 12/19/16 at 2:00 p.m.(ET)**
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SCHEDULE 1

- A. Third Interim and Final Fee Application of Paul Hastings LLP as Counsel to the Official Committee of Unsecured Creditors for Period from July 8, 2015 Through and Including August 31, 2016 [D.I. 1984, 9/23/16]
 - 1. Tenth Fee Application for the Period April 1, 2016 through April 31, 2016 [D.I. 1879, 8/2/16]
 - 2. Certificate of No Objection Regarding Tenth Monthly Application [D.I. 1925, 8/23/16]
 - 3. Eleventh Fee Application for the Period May 1, 2016 through May 31, 2016 [D.I. 1880, 8/2/16]
 - 4. Certificate of No Objection [D.I. 1926, 8/23/16]
 - 5. Twelfth Fee Application for the Period June 1, 2016 through August 31, 2016 [D.I. 1982, 9/22/16]
 - 6. Certificate of No Objection [D.I. 2022, 10/13/16]
 - 7. Fee Examiner’s Report [D.I. 2049, 11/3/16]

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DISTRICT OF DELAWARE**

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In re	:	Chapter 11
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MOLYCORP, INC., <i>et al.</i> , ¹	:	Case No. 15-11357 (CSS)
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Debtors.	:	(Jointly Administered)
	:	
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SCHEDULE 2

1. Interim Fee Requests of Paul Hastings LLP

Related Documents:

- a) Findings of Fact, Conclusions of Law and Order Confirming the Plan Debtors’ Fourth Amended Joint Plan of Reorganization [D.I. 1580, 4/8/16]
- b) Sixth Monthly Application of Paul Hastings LLP as Committee Counsel, for Allowance of Compensation and Reimbursement of Expenses for Period From December 1, 2015 Through December 31, 2015 [D.I. 1619, 4/19/16]
- c) Fee Examiner’s Report [D.I. 1813, 7/11/16]
- d) Motion of OCM MLYCo CTB Ltd. for Leave to File a Sur-Reply to Omnibus Response of Paul Hastings and Creditors’ Committee to Its Objections to Paul Hastings’ Fee Applications [D.I. 1822, 7/18/16]
- e) Order Shortening Notice of Oaktree’s Motion for Leave to File Sur-Reply [D.I. 1826, 7/19/16]
- f) Order Granting Oaktree’s Motion for Leave to File a Sur-Reply to Omnibus Response of Paul Hastings and Creditors’ Committee to Its Objections to Paul Hastings’ Fee Applications [D.I. 1846, 7/22/16]

¹ The Debtors are the following 15 entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Molycorp, Inc. (1797); Magnequench, Inc. (1833); Magnequench International, Inc. (7801); Magnequench Limited; 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 Rare Metals Holdings, Inc. (4615); Molycorp Rare Metals (Utah), Inc. (7445); Neo International Corp.

- g) Oaktree's Sur-Reply to the Omnibus Response of Official Committee of Unsecured Creditors and Paul Hastings to Oaktree's Objections to Paul Hastings' Fee Applications [D.I. 1848, 7/22/16]

Objections Filed:

- a) Objection of OCM MLYCo CTB Ltd. to the Fourth Monthly Application of Paul Hastings LLP for Allowance of Compensation and Reimbursement of Expenses for Period From September 1, 2015 Through September 30, 2015 [D.I. 1174, 1/25/16]
- b) Objection of OCM MLYCo CTB Ltd. to the Fourth Monthly Application of Paul Hastings LLP for Allowance of Compensation and Reimbursement of Expenses for Period From October 1, 2015 Through October 31, 2015 [D.I. 1239, 2/8/16]
- c) Objection of OCM MLYCo CTB Ltd. to the Application of Paul Hastings LLP for Allowance of Compensation and Reimbursement of Expenses for Period From November 1, 2015 Through November 30, 2015 [D.I. 1615, 4/18/16]
- d) Objection of OCM MLYCo CTB Ltd. to the Application of Paul Hastings LLP for Allowance of Compensation and Reimbursement of Expenses for Period From December 1, 2015 Through December 31, 2015 [D.I. 1686, 4/18/16]
- e) Objection of OCM MLYCo CTB Ltd. to the Application of Paul Hastings LLP for Allowance of Compensation and Reimbursement of Expenses for Period From January 1, 2016 Through January 31, 2016 [D.I. 1723, 5/31/16]
- f) Objection of OCM MLYCo CTB Ltd. to the Application of Paul Hastings LLP for Allowance of Compensation and Reimbursement of Expenses for Period From February 1, 2016 Through February 29, 2016 [D.I. 1762, 6/16/16]
- g) OCM MLYCo CTB Ltd.'s Reservation of Rights with Respect to the Application of Paul Hastings LLP for Allowance of Compensation and Reimbursement of Expenses for Period From March 1, 2016 Through March 31, 2016 [D.I. 1767, 6/21/16]
- h) Objection of OCM MLYCo CTB Ltd. to the Second Interim Fee Application of Paul Hastings LLP [D.I. 1800, 7/5/16]
- i) Omnibus Response of Official Committee of Unsecured Creditors and Paul Hastings to Oaktree's Objections to Paul Hastings' Fee Applications [D.I. 1804, 7/5/16]