

Hearing Date and Time: April 26, 2011 at 10:00 a.m. (ET)
Objection Deadline: April 15, 2011 at 4:00 p.m. (ET)

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Oldco M Distribution Trust*

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*Conflicts Counsel for Movant,
Executive Sounding Board Associates Inc.,
as Trustee for the Oldco M Distribution Trust*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: : Chapter 11
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OLDCO M CORPORATION, : Case No. 09-13412 (MG)
(f/k/a Metaldyne Corporation), *et al.*, :
:
:
:
: Jointly Administered
:
:

**NOTICE OF MOTION FOR AN ORDER ESTABLISHING PROCEDURES
GOVERNING ADVERSARY PROCEEDINGS COMMENCED PURSUANT
TO SECTIONS 547 AND 550 OF THE BANKRUPTCY CODE**

PLEASE TAKE NOTICE that the Oldco M Distribution Trust (the “Trust”) will present the attached Motion for an Order Establishing Procedures Governing Adversary Proceedings Commenced Pursuant to Sections 547 and 550 of the Bankruptcy Code (the “Motion”) to the Honorable Martin Glenn, United States Bankruptcy Judge, in Room 501 at the United States Bankruptcy Court for the Southern District of New York (the “Court”) at Alexander Hamilton Customs House, One Bowling Green, New York, NY 10004-1408, at a hearing to be held on **April 26, 2011 at 10:00 a.m. (ET)** (the “Hearing”).

PLEASE TAKE FURTHER NOTICE that, written objections, if any, to the relief requested in the Motion: (i) shall comply with the Federal Rules of Bankruptcy Procedure, the Local Rules of the Bankruptcy Court for the Southern District of New York and the Administrative Order, Pursuant to Rule 1015(c) of the Federal Rules of Bankruptcy Procedure, Establishing Case Management and Scheduling Procedures entered on June 5, 2009 (the “Case Management Order”); (ii) shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof; (iii) shall be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004-1408 by no later than **April 15, 2011 at 4:00 p.m. (ET)** (with two hard copies delivered directly to Chambers), and (iv) must be served upon counsel for the Trust, Duane Morris LLP, 1540 Broadway, New York, New York 10036, Attn: Lawrence J. Kotler, Esquire and conflicts counsel for the Trust, Pryor Cashman LLP, 7 Times Square, New York, New York 10036-6569, Attn: Richard Levy, Jr., Esq. and in accordance with the Case Management Order.

PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is not received by the Objection Deadline, the relief requested in the Motion shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the hearing and failure to appear may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that copies of the Case Management Order, the Special Service List and the General Service List may be obtained from the Court's website at <http://ecf.nysb.uscourts.gov> or, free of charge, at www.bmcgroup.com/metaldyne.

Dated: March 11, 2011

DUANE MORRIS LLP

By: /s/Lawrence J. Kotler
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