

DUANE MORRIS LLP  
 Lawrence J. Kotler, Esq.  
 30 South 17th Street  
 Philadelphia, PA 19103-4196  
 (215) 979-1000  
 (215) 689-4951 (facsimile)  
 and  
 1540 Broadway  
 New York, NY 10036  
 (212) 692-1000  
 (212) 208-4521 (facsimile)

*Attorney for Plaintiff, 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
	:	
OLDCO M CORPORATION, (f/k/a Metaldyne Corporation), <i>et al.</i> ,	:	Case No. 09-13412 (MG)
	:	
	:	Jointly Administered
	:	
EXECUTIVE SOUNDING BOARD ASSOCIATES INC., as Trustee for the Oldco M Distribution Trust,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	Adversary Proc. No. [__]-[____] (MG)
	:	
LIVINGSTON INTERNATIONAL, INC.,	:	
	:	
Defendant.	:	
	:	

**COMPLAINT TO: (I) AVOID AND RECOVER  
 TRANSFERS PURSUANT TO 11 U.S.C. §§ 547 AND 550;  
AND (II) DISALLOW CLAIMS PURSUANT TO 11 U.S.C. § 502(d)**

Plaintiff, Executive Sounding Board Associates Inc. (the “Trustee” or “Plaintiff”), the liquidating trustee of the Oldco M Distribution Trust (the “Trust”) established pursuant to the

*Second Amended Joint Plan of Liquidation of Debtors and Debtors in Possession* (the “Plan”) [Docket No. 1180], by and through its undersigned counsel, files this *Complaint to: (I) Avoid and Recover Transfers Pursuant to 11 U.S.C. §§ 547 and 550; and (II) Disallow Claims Pursuant to 11 U.S.C. § 502(d)* (the “Complaint”) against Livingston International, Inc. (the “Defendant”) and, in support hereof, avers the following:

### **NATURE OF THE PROCEEDING**

1. This Complaint seeks to avoid and recover from the Defendant all of the preferential transfers of property that the Debtors (as defined herein) made for or on account of antecedent debt(s) due and owing the Defendant during the ninety-day period prior to the filing of the Debtors’ bankruptcy cases (the “Preference Period”).

2. In particular, Plaintiff seeks the entry of an Order from this Court: (a) avoiding and directing the return of the avoidable transfers (the “Transfers”) identified in Exhibit “1” that were made by the Debtors (as defined herein) to the Defendant in payment of antecedent debts based upon the invoices identified therein; and (b) disallowing any Claim<sup>1</sup> unless and until the Transfers are remitted to the Trustee.

### **JURISDICTION AND VENUE**

3. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.

4. This adversary proceeding is brought pursuant to Rule 7001, *et seq.*, of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. §§ 502(d), 547 and 550.

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<sup>1</sup> To the extent that the Defendant has filed a proof of claim or has a claim listed on the Debtors’ schedules as undisputed, liquidated, and not contingent, or has otherwise requested payment from the Debtors or their substantively consolidated estate (collectively, a “Claim”), this Complaint is not intended to be, nor should it be construed as, a waiver of Plaintiff’s right to object to such Claim for any reason, including, but not limited to, Section 502(a) through (j) of the Bankruptcy Code (as defined herein), and such rights are expressly reserved. Notwithstanding this reservation of rights, Plaintiff, as set forth herein, does object to the Claim pursuant to Section 502(d) of the Bankruptcy Code.

5. Venue in this Court is proper pursuant to 28 U.S.C. § 1409 because this adversary proceeding arises under and in connection with a case under 11 U.S.C. § 101, *et seq.* (the “Bankruptcy Code”).

6. This adversary proceeding is a “core” proceeding pursuant to 28 U.S.C. §§ 157(b)(2)(A), (B), (F) and (O).

### **BACKGROUND**

7. On May 27, 2009 (the “Petition Date”), Oldco M Corporation (f/k/a Metaldyne Corporation) and 30 of its domestic direct and indirect subsidiaries, as debtors and debtors in possession (collectively, the “Debtors”), filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (the “Bankruptcy Cases”).

8. By an order entered on May 29, 2009, the Debtors’ chapter 11 cases were consolidated for procedural purposes and thereafter were jointly administered [Docket No. 65].

9. Before the Petition Date, the Debtors were leading global manufacturers of highly engineered metal components for the global light vehicle market. Their largest customers were Ford Motor Company, Chrysler LLC and its successor, Chrysler Group LLC, and General Motors Corporation and its successor, General Motors Company.

10. Due to a dramatic downturn in the global automotive industry and liquidity pressures stemming from industry stresses, issues with the Debtors’ capital structure, and the reluctance of lenders to provide capital to automotive suppliers, the Debtors filed for bankruptcy.

11. Subsequent to the Petition Date, the Bankruptcy Court, in July 2009, approved bidding procedures (the “Bidding Procedures”) for the marketing and sale of the majority of the Debtors’ assets.

12. Following an auction conducted pursuant to the Bidding Procedures, MD Investors Corporation (“MD Investors”) was determined to be the winning bidder and the Debtors and MD Investors entered into a Purchase Agreement, dated as of August 7, 2009 (the “Purchase Agreement”).

13. Pursuant to the Purchase Agreement, the Debtors agreed to sell and MD Investors agreed to buy a majority of the Debtors’ assets. In addition, MD Investors also agreed to assume certain liabilities and obligations of the Debtors (the “Asset Sale”).

14. On August 12, 2009, the Bankruptcy Court issued an order authorizing the Asset Sale under section 363 of the Bankruptcy Code [Docket No. 674].

15. On January 11, 2010, the Debtors filed the Plan and related disclosure statement. The Plan is a liquidating plan which provides for the liquidation of the Debtors’ remaining assets in order to maximize the ultimate recovery by all creditors.

16. On February 23, 2010, the Court entered an Order confirming the Plan (the “Confirmation Order”) [Docket No. 1384] and substantively consolidated these bankruptcy estates into one consolidated estate.

17. On March 30, 2010, the Plan became effective (the “Effective Date”).

18. Pursuant to the Plan, as of the Effective Date, the Debtors were dissolved and the Oldco M Distribution Trust was created in order to, *inter alia*: (i) liquidate the Debtors’ remaining assets (including any claims and causes of action possessed by the Debtors);<sup>2</sup> (ii)

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<sup>2</sup> Pursuant to the Plan, the Distribution Trust was empowered to “pursue Recovery Actions that are transferred to the Distribution Trust to the extent that their pursuit would likely result in a material economic benefit to creditors classified in Class 3 and Class 4 hereunder, as determined by the Oversight Committee, in its sole discretion.” Plan, Article III.C.1. “Recovery Actions” are defined in the Plan as “all claims and causes of action held by the Debtors’ Estates of any nature, including without limitation claims and causes of action under sections 502(d), 544, 545, 547, 548, 549, 550 and 553 of the Bankruptcy Code, and any other avoidance or similar action under the Bankruptcy Code or similar state law, and the proceeds thereof, whether received by judgment, settlement or otherwise.”

litigate and resolve claims filed against the Debtors' estates; (iii) make distributions to creditors; and (iv) take other actions permitted by Section III.C of the Plan.

19. Notwithstanding the Asset Sale and MD Investors' assumption of certain of the Debtors' liabilities and obligations, significant unsecured claims exist against the Debtors' estate.

20. As of the date of this Complaint, the unsecured claims listed on the Debtors' claim register total approximately \$353 million.

21. Indeed, as set forth more fully in the Plan and accompanying disclosure statement, the Debtors' general unsecured creditors will not receive full value on account of their claims against the Debtors.

### **PARTIES**

22. Plaintiff is the Trustee of the Trust established pursuant to the Plan.

23. Defendant is a corporation that maintains a place of business at 670 Young Street, Tonawanda, New York, 14213-0950.

24. Upon information and belief, Defendant is a freight transportation company and was, at all times material hereto, a provider of services to one or more of the Debtors.

### **COUNT I**

#### **(Avoidance and Recovery of Preferential Transfers)**

25. The allegations set forth in paragraphs 1 through 24 are realleged and incorporated by reference as if fully set forth herein.

26. On or about July 15, 2003, Metaldyne Company, LLC ("Metaldyne"), one of the Debtors in the above-captioned bankruptcy cases, and Ryder Integrated Logistics, Inc.

(“Ryder”) executed that certain Commercial Freight Management Services Agreement (the “Agreement”), pursuant to which Metaldyne appointed Ryder as its agent to provide logistics management services.

27. In particular, the Agreement required Ryder to select companies to provide freight transportation services for Metaldyne.

28. The Agreement also provided that Metaldyne would supply Ryder the funds that were required to pay the freight companies for the freight transported by these companies. At all times material hereto, Ryder, as a conduit, passed along funds it received from Metaldyne in order to pay the invoices of the freight companies.

29. Prior to the Petition Date, Ryder, on behalf of Metaldyne, contracted with the Defendant to provide freight transportation services (the “Services”) to one or more of the Debtors.

30. On or within the ninety (90) days prior to the Petition Date, one or more of the Debtors supplied Ryder with the funds that were required to pay the Defendant (the “Transfers”) for the services it provided to or on behalf of the Debtors.

31. As reflected on Exhibit 1, attached hereto and incorporated herein by reference, Ryder, as a conduit, passed the Transfers directly to the Defendant.<sup>3</sup>

32. All of the Transfers were made by or on behalf of one or more of the Debtors and came from an account or accounts owned by one or more of the Debtors. Thus, the Transfers constituted a transfer of the Debtors’ interest in property.

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<sup>3</sup> Exhibit 1 reflects Plaintiff’s current knowledge of the Transfers (made by check, wire transfer or their equivalent) to the Defendant during the Preference Period, and includes the date and amount of each such Transfer. During the course of this proceeding, Plaintiff may learn (through discovery or otherwise) of additional transfers made to the Defendant during the Preference Period. It is Plaintiff’s intention to avoid and recover all such transfers, whether such transfers are presently reflected on Exhibit 1 or not. Accordingly, Plaintiff reserves its rights to supplement and/or amend this information as necessary and appropriate.

33. At the time the Transfers were made, the Debtors were insolvent.

34. Each of the Transfers listed on Exhibit 1 was on account of an invoice or invoices for the Services provided by the Defendant to the Debtors. These invoices are also identified on Exhibit 1.

35. In exchange for the provision of these Services, the Debtors would owe money to the Defendant on account thereof.

36. Thus, the Transfers reflected on Exhibit 1 were transfers made by the Debtors on account of “antecedent debt” which the Debtors owed to the Defendant in exchange for the Defendant’s provision of the Services prior to the date each Transfer was made.

37. All of the Transfers were made to or for the benefit of the Defendant.

38. In these Bankruptcy Cases, the Debtors’ unsecured creditors will not receive payment in full on account of their claims against the Debtors; in fact, according to the disclosure statement, unsecured creditors are expected to receive at most 2.1% of the value of their claims.

39. Thus, the Transfers enabled Defendant to receive more than it would have received if: (a) the Debtors’ bankruptcy cases were administered under chapter 7 of the Bankruptcy Code; (b) the Transfers had not been made; and (c) the Defendant received payment of such debt to the extent provided for by the provisions of the Bankruptcy Code.

40. Based upon the foregoing, the Transfers constitute avoidable preferential transfers pursuant to Bankruptcy Code section 547(b) and, as such, they are recoverable from Defendant pursuant to Bankruptcy Code section 550(a).

**COUNT II**  
**(Recovery of Avoided transfers-11 U.S.C. § 550)**

41. The allegations set forth in paragraphs 1 through 40 are realleged and incorporated by reference as if fully set forth herein.

42. Based upon the foregoing, Plaintiff is entitled to avoid the Transfers pursuant to Bankruptcy Code section 547(b).

43. As Ryder was merely a conduit for the funds it received from Metaldyne, at the time the Transfers were made, the Defendant was initial transferee of the Transfers and, as such, is liable for the return of the Transfers (or the amount thereof).

44. Alternatively, to the extent Ryder is considered an initial transferee, the Defendant received the Transfers from Ryder as a subsequent transferee of the Transfers and is liable for the return of the Transfers (or the amount thereof).

45. Pursuant to Bankruptcy Code section 550(a), the Plaintiff is entitled to recover from the Defendant the Transfers or the amount thereof plus interest thereon to the date of payment as well as costs of this action.

**COUNT III**  
**(Disallowance of Claims)**

46. The allegations set forth in paragraphs 1 through 45 are realleged and incorporated by reference as if fully set forth herein.

47. The Defendant is the recipient of the Transfers, which are avoidable and recoverable under sections 547 and 550 of the Bankruptcy Code.

48. Pursuant to Bankruptcy Code section 502(d), any and all Claims of the Defendant must be disallowed unless and until Defendant returns the Transfers to Plaintiff or pays to Plaintiff the amount of the Transfers.



49. Pursuant to Bankruptcy Code section 502(j), any and all Claims of the Defendant (or any assignee) that have been previously allowed by the Debtors or the Plaintiff must be reconsidered and disallowed unless and until Defendant returns the Transfers to Plaintiff or pays to Plaintiff the amount of the Transfers.

WHEREFORE, Plaintiff respectfully requests entry of judgment on its Complaint as follows:

- a) On Count I, in favor of Plaintiff and against Defendant avoiding the Transfers;
- b) On Count II, in favor of Plaintiff and against the Defendant and directing the Defendant to return to the Plaintiff the amount of the Transfers pursuant to Bankruptcy Code §§ 547(b) and 550(a);
- c) On Count III, in favor of Plaintiff and against Defendant disallowing the Claims unless and until Defendant returns the Transfers to Plaintiff pursuant to section 502(d) of the Bankruptcy Code;
- d) Awarding pre-judgment and post judgment interest at the maximum legal rate from the date of judgment herein until the date the judgment is either paid in full or otherwise satisfied, together with the costs and expenses of this action, including, without limitation, attorneys' fees; and
- e) Granting such other and further relief as this Court may deem just and proper.

DATED: May 25, 2011

DUANE MORRIS LLP

By: /s/Lawrence J. Kotler  
Lawrence J. Kotler, Esq.  
30 South 17th Street

Philadelphia, PA 19103-4196  
(215) 979-1000  
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*Attorney for Plaintiff, Executive Sounding  
Board Associates Inc., as Trustee for the  
Oldco M Distribution Trust*

# **Exhibit 1**

**Exhibit 1**

<b>Debtor Entity Transferor</b>	<b>Transferee</b>	<b>Check Date</b>	<b>Invoice Number</b>	<b>Check Amount</b>	<b>Invoice Amount</b>
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	00359026796	\$374.77	\$374.77
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	00343506853	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	5224314	\$187.98	\$187.98
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	5224318	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	5224309	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	5224308	\$75.10	\$75.10
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	5224300	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	1621616302	\$2,417.50	\$2,417.50
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	1621368291	\$1,083.74	\$1,083.74
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	1610360478	\$1,083.74	\$1,083.74
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	1610360509	\$55.65	\$55.65
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	1610360501	\$292.73	\$292.73
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	1610375255	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	12132066734	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	12132066585	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	80758	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	00349314393	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	00349314344	\$70.65	\$70.65
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	00349314286	\$133.35	\$133.35
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	00349314237	\$283.65	\$283.65
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	00349314195	\$294.40	\$294.40
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	46810078249	\$55.65	\$55.65
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	12132066742	\$40.90	\$40.90
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	12132066684	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	2/27/2009	12132066627	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	3/6/2009	350422622	\$329.58	\$329.58
Metaldyne Company LLC	Livingston International, Inc.	3/6/2009	350422515	\$55.65	\$55.65
Metaldyne Company LLC	Livingston International, Inc.	3/6/2009	349314443	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	3/6/2009	12132072211	\$65.65	\$65.65
Metaldyne Company LLC	Livingston International, Inc.	3/6/2009	46810078231	\$63.75	\$63.75
Metaldyne Company LLC	Livingston International, Inc.	3/6/2009	12132072245	\$174.86	\$174.86

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Metaldyne Company LLC	Livingston International, Inc.	3/6/2009	350422614	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	5250069	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	867488367558	\$331.50	\$331.50
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	867488367341	\$2,674.07	\$2,674.07
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	343364931	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	325318947	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	902003676	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	9020036761	\$1,083.74	\$1,083.74
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	345941116	\$1,083.74	\$1,083.74
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	356306076	\$55.65	\$55.65
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	307743906	\$292.73	\$292.73
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	902003674	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	12131609534	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	12126889877	\$1,867.00	\$1,867.00
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	355552787	\$1,065.65	\$1,065.65
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	120344	\$3,419.26	\$3,419.26
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	120263	\$70.65	\$70.65
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	1130139	\$347.38	\$347.38
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	99780A	\$1,946.51	\$1,946.51
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	99145A	\$1,050.65	\$1,050.65
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	99144A	\$671.15	\$671.15
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	99143A	\$648.81	\$648.81
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	97621A	\$3,071.63	\$3,071.63
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	97620A	\$87.88	\$87.88
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	12122951614	\$3,473.46	\$3,473.46
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	1TL497436	\$63.75	\$63.75
Metaldyne Company LLC	Livingston International, Inc.	3/13/2009	12132078408	\$80.90	\$80.90
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	112539	\$18.80	\$18.80
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	111870	\$18.80	\$18.80
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	222191	\$247.10	\$247.10
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	13442	\$55.00	\$55.00

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Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	13437	\$65.00	\$65.00
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	12119158603	\$96.38	\$96.38
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	12127532112	\$65.00	\$65.00
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	1241113553	\$18.80	\$18.80
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	13443	\$109.70	\$109.70
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	13444	\$18.80	\$18.80
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	13439	\$18.80	\$18.80
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	1171077707	\$18.80	\$18.80
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	1230526880	\$18.80	\$18.80
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	1091485636	\$18.80	\$18.80
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	1221022506	\$318.05	\$318.05
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	12129900002	\$18.80	\$18.80
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	1161095179	\$116.00	\$116.00
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	1160979138	\$96.55	\$96.55
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	1160880589	\$1,165.20	\$1,165.20
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	1161017898	\$18.80	\$18.80
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	1091231907	\$80.00	\$80.00
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	863844701790	\$131.46	\$131.46
Metaldyne Company LLC	Livingston International, Inc.	4/17/2009	863844701805	\$192.04	\$192.04
Metaldyne Company LLC	Livingston International, Inc.	3/27/2009	00357455658	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	3/27/2009	12132051827	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	3/27/2009	00357455625	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	3/27/2009	210421	\$1,083.74	\$1,083.74
Metaldyne Company LLC	Livingston International, Inc.	3/27/2009	00350422945	\$1,083.74	\$1,083.74
Metaldyne Company LLC	Livingston International, Inc.	3/27/2009	00350422952	\$55.65	\$55.65
Metaldyne Company LLC	Livingston International, Inc.	3/27/2009	00000038653W129	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	3/27/2009	4683132347	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	3/27/2009	12122955748	\$65.65	\$65.65
Metaldyne Company LLC	Livingston International, Inc.	3/27/2009	00357455617	\$7.82	\$7.82
Metaldyne Company LLC	Livingston International, Inc.	3/27/2009	4683132339	\$55.65	\$55.65
Metaldyne Company LLC	Livingston International, Inc.	3/27/2009	00357455542	\$132.11	\$132.11

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Metaldyne Company LLC	Livingston International, Inc.	3/27/2009	00350422861	\$80.65	\$80.65
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	00357455864	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	00357455815	\$501.27	\$501.27
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	12132052221	\$62.70	\$62.70
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	12132041851	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	00357455781	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	00357455468	\$97.20	\$97.20
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	00357455856	\$330.65	\$330.65
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	00357455898	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	00357455757	\$154.61	\$154.61
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	00357455435	\$117.65	\$117.65
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	00357455401	\$172.42	\$172.42
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	00000038653W149	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	12122955177	\$63.75	\$63.75
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	00357455880	\$50.20	\$50.20
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	00357455849	\$62.70	\$62.70
Metaldyne Company LLC	Livingston International, Inc.	4/10/2009	00357455492	\$62.70	\$62.70
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	926489062	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	9020032982	\$3,158.57	\$3,158.57
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	926488472	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	926489494	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	902003766	\$295.65	\$295.65
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	9020037661	\$55.65	\$55.65
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	926489537	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	926488868	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	926488509	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	902003777	\$1,504.24	\$1,504.24
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	9020037771	\$65.65	\$65.65
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	902003750	\$1,628.37	\$1,628.37
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	902003751	\$1,946.51	\$1,946.51
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	9020037031	\$1,060.65	\$1,060.65

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Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	902003758	\$2,055.79	\$2,055.79
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	902003720	\$2,304.64	\$2,304.64
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	9020037201	\$5,493.89	\$5,493.89
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	926483794	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	902003778	\$125.93	\$125.93
Metaldyne Company LLC	Livingston International, Inc.	4/24/2009	9020037781	\$65.65	\$65.65
Metaldyne Company LLC	Livingston International, Inc.	4/3/2009	00357455252	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	4/3/2009	1305778541	\$316.86	\$316.86
Metaldyne Company LLC	Livingston International, Inc.	4/3/2009	00343862751	\$55.65	\$55.65
Metaldyne Company LLC	Livingston International, Inc.	4/3/2009	00356240705	\$65.65	\$65.65
Metaldyne Company LLC	Livingston International, Inc.	4/3/2009	12123767902	\$1,808.75	\$1,808.75
Metaldyne Company LLC	Livingston International, Inc.	4/3/2009	0654742	\$346.27	\$346.27
Metaldyne Company LLC	Livingston International, Inc.	4/3/2009	00343486874	\$345.27	\$345.27
Metaldyne Company LLC	Livingston International, Inc.	4/3/2009	00349099176	\$396.35	\$396.35
Metaldyne Company LLC	Livingston International, Inc.	4/3/2009	241868	\$70.65	\$70.65
Metaldyne Company LLC	Livingston International, Inc.	4/3/2009	00351843883	\$122.20	\$122.20
Metaldyne Company LLC	Livingston International, Inc.	4/3/2009	00356052795	\$306.65	\$306.65
Metaldyne Company LLC	Livingston International, Inc.	4/3/2009	00346858830	\$2,274.50	\$2,274.50
Metaldyne Company LLC	Livingston International, Inc.	4/3/2009	00353897069	\$1,075.65	\$1,075.65
Metaldyne Company LLC	Livingston International, Inc.	4/3/2009	12134207260	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	1621501898	\$2,090.00	\$2,090.00
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	1621419121	\$967.31	\$967.31
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	1610359629	\$1,645.13	\$1,645.13
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	1610373069	\$1,305.17	\$1,305.17
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	1221022515	\$720.77	\$720.77
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	1TL506237	\$2,425.63	\$2,425.63
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	00357430644	\$951.43	\$951.43
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	00357430578	\$247.75	\$247.75
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	00357430529	\$55.65	\$55.65
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	00357420686	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	00357430628	\$19.45	\$19.45



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Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	00357430503	\$65.65	\$65.65
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	12132049318	\$1,362.93	\$1,362.93
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	12132045621	\$1,943.45	\$1,943.45
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	12132045563	\$1,085.65	\$1,085.65
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	12124381331	\$65.65	\$65.65
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	00357420637	\$3,054.20	\$3,054.20
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	00357430636	\$3,054.90	\$3,054.90
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	00357430560	\$1,749.96	\$1,749.96
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	00357430511	\$70.65	\$70.65
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	00357420678	\$330.03	\$330.03
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	00357420645	\$2,530.50	\$2,530.50
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	12132045571	\$194.70	\$194.70
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	00357420710	\$2,304.64	\$2,304.64
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	856787424840	\$3,473.46	\$3,473.46
Metaldyne Company LLC	Livingston International, Inc.	5/1/2009	00357430552	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	5/15/2009	926494138	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	5/15/2009	926494091	\$44.45	\$44.45
Metaldyne Company LLC	Livingston International, Inc.	5/15/2009	926494569	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	5/15/2009	902003804	\$191.88	\$191.88
Metaldyne Company LLC	Livingston International, Inc.	5/15/2009	926494402	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	5/15/2009	902003830	\$373.78	\$373.78
Metaldyne Company LLC	Livingston International, Inc.	5/15/2009	9020038301	\$65.65	\$65.65
Metaldyne Company LLC	Livingston International, Inc.	5/15/2009	9020037861	\$124.27	\$124.27
Metaldyne Company LLC	Livingston International, Inc.	5/15/2009	9020037851	\$345.65	\$345.65
Metaldyne Company LLC	Livingston International, Inc.	5/15/2009	902003806	\$82.20	\$82.20
Metaldyne Company LLC	Livingston International, Inc.	5/15/2009	9020038171	\$80.65	\$80.65
Metaldyne Company LLC	Livingston International, Inc.	5/15/2009	902003817	\$170.82	\$170.82
Metaldyne Company LLC	Livingston International, Inc.	5/15/2009	926493448	\$18.80	\$18.80
Metaldyne Company LLC	Livingston International, Inc.	5/22/2009	00353522717	\$44.45	\$44.45
Metaldyne Company LLC	Livingston International, Inc.	5/22/2009	0325318	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	5/22/2009	1150733761	\$125.65	\$125.65

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Metaldyne Company LLC	Livingston International, Inc.	5/22/2009	12117710454	\$97.03	\$97.03
Metaldyne Company LLC	Livingston International, Inc.	5/22/2009	869288383610	\$65.65	\$65.65
Metaldyne Company LLC	Livingston International, Inc.	5/22/2009	869288383595	\$116.65	\$116.65
Metaldyne Company LLC	Livingston International, Inc.	5/22/2009	869288383600	\$346.20	\$346.20
Metaldyne Company LLC	Livingston International, Inc.	5/22/2009	869288383389	\$114.50	\$114.50
Metaldyne Company LLC	Livingston International, Inc.	5/22/2009	869288383584	\$125.65	\$125.65
Metaldyne Company LLC	Livingston International, Inc.	5/22/2009	869288383621	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	1610361625	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	1610364172	\$266.70	\$266.70
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	1221022522	\$1,926.28	\$1,926.28
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	1221022520	\$1,863.53	\$1,863.53
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	1221022519	\$1,664.94	\$1,664.94
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	1221022517	\$65.65	\$65.65
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	84313	\$0.65	\$0.65
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	00357423367	\$75.35	\$75.35
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	00357423342	\$122.20	\$122.20
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	00357423268	\$112.70	\$112.70
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	00357430701	\$112.70	\$112.70
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	00357455476	\$77.70	\$77.70
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	00357423433	\$77.70	\$77.70
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	12131229341	\$1,083.74	\$1,083.74
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	12132049615	\$1,083.74	\$1,083.74
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	12132049508	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	12132049375	\$19.45	\$19.45
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	902003741	\$65.65	\$65.65
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	902003740	\$1,088.54	\$1,088.54
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	902003739	\$589.02	\$589.02
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	902003738	\$131.27	\$131.27
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	9020036551	\$549.24	\$549.24
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	9020036535	\$70.65	\$70.65
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	00357423359	\$1,060.65	\$1,060.65

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Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	00357423250	\$534.36	\$534.36
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	00357430693	\$4,535.65	\$4,535.65
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	915559316	\$65.65	\$65.65
Metaldyne Company LLC	Livingston International, Inc.	5/8/2009	12132049326	\$125.93	\$125.93
<b>Total Amount of Transfers:</b>				<b>\$117,169.77</b>	