

**Objection Deadline: October 27, 2011 at 4:00 p.m. (ET)**  
**Hearing Date: November 3, 2011 at 10:00 a.m. (ET)**

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Counsel to the Oldco M Distribution Trust

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

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In re : Chapter 11  
Oldco M Corporation :  
(f/k/a Metaldyne Corporation), *et al.*, : Case No. 09-13412 (MG)  
Debtors. : (Jointly Administered)  
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**NOTICE OF HEARING ON OMNIBUS OBJECTION OF OLDSCO M DISTRIBUTION  
TRUST SEEKING TO DISALLOW, REDUCE, LIQUIDATE, EXPUNGE AND  
RECLASSIFY CERTAIN CLAIMS (OMNIBUS OBJECTION NO. 28)**

**TO THE CLAIMANTS IDENTIFIED ON THE ATTACHED EXHIBITS AND SUBJECT  
TO THE ATTACHED OBJECTION:**

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

1. The Oldco M Distribution Trust (the “Trust”), as successor to Oldco M Corporation (f/k/a Metaldyne Corporation), has filed an objection (the “Objection”) to the claim you filed against the bankruptcy estate of Oldco M Corporation or one or more of its 30 domestic direct and indirect subsidiaries, as debtors and debtors in possession (collectively, the “Debtors”). That Objection is appended to this Notice and is titled “Omnibus Objection of Oldco M Distribution Trust Seeking to Disallow, Reduce, Liquidate, Expunge and Reclassify Certain Claims (Omnibus Objection No. 28).”
2. Your claim may be disallowed and/or otherwise affected as a result of the Objection. Therefore, you should read this Notice and the attached Objection carefully. Moreover, you should locate your name and claim on Exhibits 1 through 5 attached to the Objection.
3. On **November 3, 2011 at 10:00 a.m., prevailing Eastern Time**, a hearing (the “Hearing”) on the Objection will be held before the Honorable Martin Glenn, United States Bankruptcy Judge, in Courtroom 501 at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004-1408.
4. If you disagree with the Objection, you or your attorney **must**: (a) file a written response (a “Response”) to the Objection with the Clerk of the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004-1408 **no later than October 27, 2011 at 4:00 p.m., prevailing Eastern Time**; and (b) serve copies of your response so as to be **actually received** no later than **August 18, 2010 at 4:00 p.m., prevailing Eastern Time**, by the following parties: (i) Oldco M Distribution Trust, c/o Executive Sounding Board Associates, Inc., 2 Penn Center, 1500 JFK Blvd., Suite 1730, Philadelphia, Pennsylvania 19102 (Attn: Robert D. Katz); (ii) Reed Smith LLP, 599 Lexington Ave., New York, New York 10022 (Attn: Mark D. Silverschotz, Esq.); (iii) Reed Smith LLP, 1201 Market Street, Suite 1500, Wilmington, Delaware 19801 (Attn: Kimberly E. C. Lawson, Esq.); and (iv) the parties on the Special Service List in these cases, established under the Administrative Order, Pursuant to Bankruptcy Rule 1015(c), Establishing Case Management and Scheduling Procedures in these cases (Docket No. 133) (as it may be amended, the “Case Management Order”).
5. Any Response should contain the following:
  - ◆ The approved case caption (including the hearing date in the upper right-hand corner) and the title of the Objection to which the Response is directed;
  - ◆ The name of the claimant and description of the bases for the amount and priority of the underlying claim;
  - ◆ A concise statement setting forth the reasons why the Court should not sustain the Objection, including, but not limited to, the specific factual and legal bases upon which the Claimant will rely in opposing the Objection;

- ◆ A copy of any documentation or other evidence of the claim upon which the claimant will rely in opposing the Objection at the Hearing, potentially including a declaration of a person with personal knowledge, to the extent that such documentation or evidence is not included with the claimant's proof of claim; and
  - ◆ The name(s), address(es), telephone number(s), facsimile number(s) and e-mail address(es) of the person(s) (who may be the claimant and/or the claimant's legal representative) to whom the Trust's attorneys should serve any reply to the Response.
6. To facilitate a resolution of the Objection, you are encouraged to provide in your Response the name(s), address(es), telephone number(s), facsimile number(s) and e-mail address(es) of the person(s) who possess the authority to reconcile, settle or otherwise resolve the Objection on your behalf.
  7. If you or your designated attorney or representative do not timely file and serve the Response in accordance with the above-referenced procedures, the Court may enter an order granting the relief requested in the Objection. If you or your designated representative or attorney do file a Response and the matter is not otherwise resolved or adjourned, it will be presented to the Court at the Hearing. Only those Responses made in accordance with the above-referenced requirements and timely filed and received by the Court and the Debtors' attorneys will be considered by the Court at the Hearing. **If you fail to respond in accordance with this Notice, the Court may grant the relief requested in the Objection without further notice or hearing.**
  8. Additional copies of the Objection and copies of the Case Management Order and the Special 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](http://www.bmcgroup.com/metaldyne).

Dated: October 4, 2011  
New York, New York

Respectfully submitted,

/s/ Mark D. Silverschotz  
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