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Counsel for the individual trustees Gary Conley, Richard Davis, Douglas Guerdat, and Nora Quinn and the Proposed Auto Retiree VEBA Trust (Ohio, Michigan, Wisconsin)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

Oldco M Corporation (f/k/a Metaldyne Corporation, *et al.*,

Debtors.

Chapter 11

Case No. 09-13412 (MG)

Presentment Date and Time:

October 14, 2011

at 12:00 noon ET

(Jointly Administered)

NOTICE OF PRESENTMENT OF ORDER ESTABLISHING A VOLUNTARY EMPLOYEE BENEFIT ASSOCIATION TO OFFER RETIREE GROUP_BENEFITS ELIGIBLE FOR THE HEALTH COVERAGE TAX CREDIT AND OPPORTUNITY FOR HEARING

PLEASE TAKE NOTICE THAT upon the Motion By Individual Trustees And The Proposed Auto Retiree VEBA Trust For Order Establishing A Voluntary Employee Benefit Association To Offer Retiree Group Benefits Eligible For The Health Coverage Tax Credit (Docket No. 2097) submitted by the individual trustees Gary Conley, Richard Davis, Douglas Guerdat, and Nora Quinn and the proposed Auto Retiree VEBA Trust (Ohio, Michigan, Wisconsin), annexed hereto as Exhibit A, the undersigned will present the proposed order (the

"Order") annexed hereto as Exhibit B to the Honorable Martin Glenn, United States Bankruptcy Judge, for signature on October 11, 2011, at 12:00 noon prevailing Eastern Time.

PLEASE TAKE FURTHER NOTICE THAT unless a written objection to the proposed Order, with proof of service, is filed with the Clerk of the Court and a courtesy copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of presentment,

there will not be a hearing and the Order may be signed.

may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE THAT if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel

Dated: San Francisco, California September 12, 2011 FARELLA BRAUN + MARTEL LLP

By: <u>/s/</u> Gary M. Kaplan Gary M. Kaplan

Counsel for the individual trustees Gary Conley, Richard Davis, Douglas Guerdat, and Nora Quinn and the Proposed Auto Retiree VEBA Trust (Ohio, Michigan, Wisconsin)

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