

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 | : Case No. 09-13412 (MG) |
| | : : |
| (f/k/a Metaldyne Corporation), et al., | : (Jointly Administered) |
| | : : |
| Debtors | : : |
| | : : |
| -----X | |

**SUPERIOR CONTROLS, INC.'S RESPONSE TO OMNIBUS OBJECTION OF OLDCO
M DISTRIBUTION TRUST SEEKING TO ALLOW, REDUCE, LIQUIDATE,
EXPUNGE AND RECLASSIFY CERTAIN CLAIMS (OMNIBUS OBJECTION NO. 28)**

Superior Controls, Inc. ("Superior") for its Response to Omnibus Objection of Oldco M
Distribution Trust Seeking to Allow, Reduce, Liquidate, Expunge and Reclassify Certain Claims
(Omnibus Objection No. 28), states as follows:

1. The Oldco M Distribution Trust (“Trust”) filed an objection to Claim number 3043 in the amount of \$600,000 of Superior Controls, Inc. (“Superior”), referenced in Exhibit 3 “Overstated and Improper Classification Claims,” seeking to reclassify Superior’s secured claim to \$31,748.60 secured and \$285,737.40 unsecured and expunge \$568,251.40 of the claim.

2. The stated “Basis For Objection” by the Trust is that “The Debtors do not have any liability for \$286,664 as those amounts were assumed by MDI and therefore the claim should be reduced accordingly. Through correspondence with Accretive, the Claimant agrees with this reduction. The collateral was sold at auction which resulted in a 10% recovery and therefore the value of the collateral and security should be reduced accordingly.”

3. Superior has received conflicting information on what collateral and contracts were assumed by MDI as it has not received full payment for debts related to the subject invoices and collateral from either MDI or Oldco M.

4. Contrary to the supporting documentation attached to Exhibit 3 to this Objection, at no time did Claimant “agree with the reduction” “through correspondence with Accretive” as the correspondence from Superior attached at Exhibit 3 merely requests discussion regarding the content of Accretive’s undated letter, not an agreement to anything.

5. Superior is without sufficient information to respond what “collateral was sold at an auction which resulted in a 10% recovery”, therefore Superior disputes such a reduction.

6. Superior's supporting documentation for its claim is attached as Exhibit 1.

Respectfully Submitted,

WARNER NORCROSS & JUDD LLP

Date: October 27, 2011

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ECF CERTIFICATE OF SERVICE

The undersigned certifies that a copy of Superior Control, Inc.'s Response to Objection to Claim was served upon each attorney or party of record herein by electronic means or overnight mail on October 27, 2011.

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