

**Objection Deadline: March 3, 2015 at 4:00 p.m. (ET)**  
**Hearing Date: March 10, 2015 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), <i>et al.</i> ,	: :
	: (Jointly Administered)
Debtors.	: :
	: :
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**NOTICE OF MOTION OF THE OLDSCO M DISTRIBUTION  
TRUST FOR AN ORDER EXTENDING THE TERMINATION  
DATE OF THE OLDSCO M DISTRIBUTION TRUST**

**PLEASE TAKE NOTICE** that the Oldco M Distribution Trust (the “Trust”) will move before the Honorable Martin Glenn, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004-1408, **on March 10, 2015 at 10:00 a.m. (ET)**, for entry of an order extending the termination date of the Oldco M Distribution Trust by one (1) year. Annexed hereto is the Motion of the Oldco M Distribution Trust for an Order Extending the Termination Date of the Oldco M Distribution Trust, filed on February 17, 2015.

**PLEASE TAKE FURTHER NOTICE** that written objection, if any, to the relief requested by the Trust shall conform to 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”), shall set forth the name of the objecting party, the basis for the objections and the specific grounds thereof, 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 **March 3, 2015 at 4:00 p.m. (ET)** (with two hard copies delivered directly to Chambers), and must be served upon counsel for the Trust, Reed Smith LLP, 599 Lexington Avenue, New York, New York 10022, Attn: Mark D. Silverschotz, Esquire and 1201 N. Market Street, Suite 1500, Wilmington, DE 197801, Attn: Kimberly E. C. Lawson, Esquire 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](http://www.bmcgroup.com/metaldyne).

Dated: February 17, 2015  
New York, New York

Respectfully submitted,

/s/ Mark D. Silverschotz

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