

HEARING DATE: SEPTEMBER 16, 2009 AT 10:00 A.M.
OBJECTION DEADLINE: SEPTEMBER 11, 2009 AT 4:00 P.M.

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RICHARD M. METH, ESQ. (R.M. - 7791) (Application for admission, *pro hac vice*, to be filed)

- and -

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Traverse City, Michigan 49685
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R. JAY HARDIN, ESQ. (Mich. P35458) (Application for admission, *pro hac vice*, to be filed)

DANIEL M. MORLEY, ESQ. (Mich. P43310) (Application for admission, *pro hac vice*, to be filed)

ATTORNEYS FOR ANTHONY ZIEBRON AND JAMES VRANA

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

METALDYNE CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 09-13412 (MG)

Jointly Administered

**NOTICE OF HEARING ON MOTION (I) TO LIFT
AUTOMATIC STAY, AND (II) TO EXTEND TIME FOR FILING
PROOFS OF CLAIM BY UNKNOWN POTENTIAL MEMBERS OF THE
CLASS IN AN ACTION FILED IN THE EASTERN DISTRICT OF MICHIGAN**

PLEASE TAKE NOTICE that on September 16, 2009, at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned counsel for Anthony Ziebron and James Vrana, individually, and all other similarly situated in a civil action entitled *Anthony Ziebron, et al., Plaintiffs v. Metaldyne Corporation, et al, Defendants* (Case No. 09-10164)(E.D. Michigan) (collectively, the "Movants") shall move before the Honorable Martin Glenn, United States

Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom Room 501, One Bowling Green, New York, NY 10004 for the entry of an Order (i) Lifting the Automatic Stay, And (ii) Extending Time For Filing Proofs Of Claim By Unknown Potential Members Of The Class In An Action Filed In The Eastern District Of Michigan (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, Movants shall rely upon the pleadings submitted herewith, oral argument at the hearing, and upon such other and further evidence as may be presented prior to or at the time of the hearing on the Motion, if any.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must be in writing, setting forth the facts and authorities upon which an objection is based, filed with the Clerk of the Court, United States Bankruptcy Court, The Alexander Hamilton Custom House, One Bowling Green, New York, New York, 10004-1408, (a) through the Bankruptcy Court’s electronic filing system (in accordance with General Order M-242, as amended by General Order M-269); or (b) if a party is unable to file electronically such party shall submit the objection in PDF format on a diskette in an envelope with the case name, case number, type and title of document, document number of the document to which the objection refers, and the file name on the outside of the envelope; or (c) if a party is unable to file electronically or use PDF format, such party shall submit the objection on a diskette in either Word, WordPerfect, or DOS text (ASCII) format. An objection filed by a party with no legal representation shall comply with section (b) or (c) as set forth in this paragraph. A hard copy of the objection, whether filed pursuant to section (a), (b) or (c), as set forth in this paragraph, shall be delivered directly to the Chambers of the Honorable Martin Glenn, and served so as to be received by: (i) Chambers, (ii)

local counsel for Movants, Day Pitney LLP, 200 Campus Drive, Florham Park, NJ 07932, Attention: Richard M. Meth, Esq., and (iii) primary counsel for Movants, Smith Haughey Rice & Roegge, P.O. Box 848, Traverse City, Michigan 49685, Attention: R. Jay Hardin, Esq. and Daniel M. Morley, Esq., by September 11, 2009, at 4:00 p.m. (EDT). Only those parties who have timely filed and served an objection to the Motion will be heard at the hearing on the Motion.

PLEASE TAKE FURTHER NOTICE that in the event no objections to the relief sought in the Motion are received, the Court may, in its discretion, grant the Motion without the need for a hearing.

Dated: August 13, 2009
Florham Park, NJ

By: /s/ Richard M. Meth _____
RICHARD M. METH (RM7791)
AMISH R. DOSHI (AD5996)
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