

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

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In re : Chapter 11
Metaldyne Corporation, *et al.*, : Case No. 09-13412 (MG)
Debtors. : (Jointly Administered)
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**ORDER, PURSUANT TO SECTION 105(a)
OF THE BANKRUPTCY CODE AND BANKRUPTCY
RULE 3007, AUTHORIZING THE FILING OF OMNIBUS CLAIM OBJECTIONS**

This matter coming before the Court on the Motion of Debtors and Debtors in Possession for an Order, Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 3007, Authorizing the Filing of Omnibus Claim Objections (the "Motion"),¹ filed by the debtors and debtors in possession in the above-captioned cases (collectively, the "Debtors"); the Court having reviewed the Motion and having considered the statements of counsel at a hearing before the Court (the "Hearing"); and the Court having found that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (c) notice of the Motion and the Hearing was sufficient under the circumstances and (d) cause has been established under Bankruptcy Rule 3007(c) to authorize the filing of Omnibus Objections on the Additional Permitted Grounds; and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein;

¹ Capitalized terms not otherwise defined herein shall have the meanings given to them in the Motion.

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as modified herein.

2. The Debtors and any trustee or other estate representative appointed under section 1123 of the Bankruptcy Code (a "Successor") are authorized, in addition to the grounds enumerated in Bankruptcy Rule 3007(d), to file Omnibus Objections seeking reduction, reclassification and/or disallowance of Claims on one or more of the following additional grounds:

- (a) the Claims' asserted amount contradicts the Debtors' books and records;
- (b) the Claims were incorrectly classified as administrative, secured or priority claims;
- (c) the Claims are Pension Claims for which the Debtors assert that they are not liable;
- (d) the Claims are objectionable under section 502(e)(1) of the Bankruptcy Code; or
- (e) the Claims are for liabilities that have been paid by the Debtors or that are being assumed and paid by a buyer of the Debtors' assets.

3. The Debtors or any Successor are required to comply with Bankruptcy Rule 3007 in all other respects, including that the Debtors or any Successor will: (a) serve affected claimants with notice of an Omnibus Objection at least 30 days prior to the hearing on such objection; and (b) comply with the requirements for Omnibus Objections set forth in Bankruptcy Rule 3007(e), including that each Omnibus Objection shall:

- (a) state in a conspicuous place that claimants receiving the objection should locate their names and claims in the objection;
- (b) list claimants alphabetically, provide a cross-reference to the claim numbers, and, if appropriate, list claimants by category of claims;
- (c) state the grounds of the objection to each claim and provide a cross-reference to the pages in the omnibus objection pertinent to the stated grounds;

- (d) state in the title the identity of the objector and the grounds for the objections;
- (e) be numbered consecutively with other omnibus objections filed by the same objector; and
- (f) contain objections to no more than 100 Claims.

4. Any order granting an Omnibus Objection shall be a final order with respect to each Claim subject to the order as if each Claim had been subject to an individual objection.

5. Nothing in this Order shall constitute an admission of the validity, nature, amount or priority of any Claim asserted in these cases.

6. The entry of this Order is without prejudice to the Debtors' rights to seek entry of an order modifying or supplementing the relief granted herein.

7. This Court shall retain jurisdiction to hear and determine all matters arising from the interpretation and/or implementation of this Order.

Dated: October 30, 2009
New York, New York

/s/ Martin Glenn
United States Bankruptcy Judge