

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MINNESOTA

In re:

Magnetation LLC,	Case No. 15-50307
Debtor.	Chapter 11 Case
Mag Lands, LLC,	Case No. 15-50308
Debtor.	Chapter 11 Case
Mag Finance Corp.,	Case No. 15-50309
Debtor.	Chapter 11 Case
Mag Mining, LLC,	Case No. 15-50310
Debtor.	Chapter 11 Case
Mag Pellet LLC,	Case No. 15-50311
Debtor.	Chapter 11 Case

**NOTICE OF INTENT TO SEEK EXPEDITED RELIEF**

TO: The parties in interest as specified in Local Rule 9013-3(a)(2).

Magnetation LLC (“**Mag LLC**”) and its subsidiaries, as debtors and debtors in possession in these chapter 11 cases (collectively, the “**Debtors**”), give notice that they intend to seek expedited relief at 10:00 a.m. (prevailing Central time) on May 7, 2015 in Courtroom No. 2A, U.S. Courthouse, 316 North Robert Street, St. Paul, Minnesota 55101, on the following motions:

1. Notice of Hearing and Joint Motion for an Order (i) Granting an Expedited Hearing and (ii) Authorizing Joint Administration of Chapter 11 Cases;
2. Notice of Hearing and Joint Motion for an Order (i) Granting an Expedited Hearing and (ii) Modifying the Bar Date for Filing Proofs of Claim;
3. Notice of Hearing and Joint Motion for an Order (i) Granting an Expedited Hearing, (ii) Authorizing Maintenance of the Debtors’ Existing Cash Management System,

Purchase Card Program and Existing Bank Accounts and Business Forms and (iii) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers;

4. Notice of Hearing and Joint Motion for an Order (i) Granting an Expedited Hearing, (ii) Authorizing the Debtors to (a) Pay Prepetition Wages, Salaries, Employee Benefits and Other Compensation, (b) Maintain Employee Benefits Programs and Pay Related Administrative Obligations and (c) Honor Management Services Agreement and Pay Prepetition Obligations Related Thereto, (iii) Authorizing Magnetation Employees to Proceed with Outstanding Workers' Compensation Claims and (iv) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers;

5. Notice of Hearing and Joint Motion for an Order (i) Granting an Expedited Hearing, (ii) Authorizing the Debtors to Pay the Prepetition Claims of Certain Critical Vendors and (iii) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers;

6. Notice of Hearing and Joint Motion for an Order (i) Granting an Expedited Hearing, (ii) Authorizing the Debtors to Pay Certain Prepetition Claims of Shippers, Warehousemen and Service Providers and (iii) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers;

7. Notice of Hearing and Joint Motion for an Order (i) Granting an Expedited Hearing, (ii) Authorizing the Debtors to Continue and Renew Their Liability, Property, Casualty and Other Insurance Programs and Honor All Obligations in Respect Thereof and (iii) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers;

8. Notice of Hearing and Joint Motion for an Order (i) Granting an Expedited Hearing, (ii) Granting Administrative Expense Status to the Debtors' Undisputed Obligations to Vendors Arising From the Postpetition Delivery of Goods Ordered Prepetition, (iii) Authorizing

the Debtors to Pay Those Obligations in the Ordinary Course of Business and (iv) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers;

9. Notice of Hearing and Joint Motion for an Order (i) Granting an Expedited Hearing, (ii) Authorizing the Debtors to Pay Certain Prepetition Taxes, Governmental Assessments and Fees and (iii) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers;

10. Debtors' Notice of Hearing and Joint (i) Motion for an Order Granting an Expedited Hearing and (ii) Application for an Order Appointing Donlin, Recano & Company, Inc. as the Claims, Noticing and Balloting Agent for the Debtors, Effective *Nunc Pro Tunc* to the Petition Date;

11. Notice of Hearing and Joint Motion for an Order (i) Granting an Expedited Hearing, (ii) Prohibiting Utilities from Altering, Refusing or Discontinuing Service, (iii) Deeming Utility Companies Adequately Assured of Future Performance and (iv) Establishing Procedures for Determining Requests for Additional Adequate Assurance;

12. Notice of Hearing and Joint Motion for an Order (i) Granting an Expedited Hearing and (ii) Authorizing the Debtors to Assume the Technology License Agreement; and

13. Notice of Hearing and Joint Motion for Entry of Interim and Final Orders (i) Granting an Expedited Hearing, (ii) Authorizing the Debtors (a) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1), 364(e) and 507 and (b) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363 and (iii) Granting Adequate Protection to Prepetition Secured Creditors Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507.

Dated: May 5, 2015

FREDRIKSON & BYRON, P.A.

/s/ Clinton Cutler

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– and –

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