

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:12-cv-00292-RM-KMT

In re MOLYCORP, INC. SECURITIES LITIGATION

DECLARATION OF DONALD E. MCALPIN

I, DONALD E. MCALPIN, declare as follows:

1. I am one of the Court-appointed Lead Plaintiffs in this case. I submit this declaration in support of final approval the proposed settlement (the “Settlement”), the plan of allocation, and an award of attorneys’ fees and reimbursement of expenses. I also submit this declaration in support of my request for reimbursement for my time associated with the 44 hours that I spent over the course of nearly 5 years monitoring and participating in the litigation, along with my out-of-pocket expenses. I have personal knowledge of the statements herein, and, if called as a witness, could and would testify competently thereto.

2. After being appointed Lead Plaintiff on May 29, 2012, I spent a considerable amount of time fulfilling my Lead Plaintiff responsibilities and assisting in the prosecution of this case. These tasks include, without limitation: (a) engaging in telephonic conferences and otherwise communicating with my counsel on a regular basis; (b) keeping fully informed regarding the status and progress of the litigation; (c) reviewing the material issues in the case including the claims and defenses asserted; (d) reviewing and approving the amended complaint prior to filing; (e) reviewing additional proposed and actual Court filings in this action; (f) searching for and

compiling documents related to the litigation; and (g) at all times keeping apprised of and providing input concerning the litigation. I also consulted with my counsel regarding discussions with defendants' counsel concerning settlement and the progress towards settlement accomplished at the mediation sessions.

3. As a consequence of this informed and deliberate process, I approved the settlement of this action for \$20,500,000. I believe that in light of the legal and factual issues presented by this case, as I understand them, this settlement represents an excellent recovery on behalf of the Class and a resolution of the litigation that is fair, reasonable and adequate and in the best interest of each class member. I also support an award of attorneys' fees in this action of up to thirty percent of the recovery obtained, and the reimbursement of litigation-related expenses, not to exceed \$600,000, as fair and reasonable in light of the favorable result obtained, the attorney time expended over the past 5 years and the risks and the complexity of the prosecution of this action.

4. My counsel have informed me that the Private Securities Litigation Reform Act allows for the reimbursement of time and expenses incurred by a representative plaintiff such as myself in connection with services rendered in the litigation. I have expended 44 hours over the course of nearly 5 years to discharge my responsibilities in this action as described in paragraphs 1 & 2, above. (I expended significant additional time prior to seeking appointment, for which I am not seeking reimbursement). Based upon an hourly rate of \$37 per hour, which is the approximate amount that I earned on an hourly basis as a Manufacturing Engineer prior to my retirement, I seek recovery of \$1,628.00 as reimbursement for my time spent. I am also seeking reimbursement of \$36.25 in out-of-pocket expenses that I personally incurred in connection with my duties. These expenses were the costs of mailing and faxing various documents. In total, I am seeking reimbursement of \$1,664.25 for my time and for out-of-pocket costs.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 2nd day of May 2017.

Donald E. McAlpin

DONALD E. MCALPIN

CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2017, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 5, 2017.

s/ Trig R. Smith
TRIG R. SMITH

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Mailing Information for a Case 1:12-cv-00292-RM-KMT Molycorp Shareholder Group et al v. Molycorp, Inc. et al

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)