

**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

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**DECLARATION OF THE IRON WORKERS MID-SOUTH PENSION FUND**

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I, Christina L. Carroll, Esq., declare as follows:

1. I am a partner of the law firm Robien, Urann, Spencer, Picard & Cangemi APLC and fund counsel to representative plaintiff Iron Workers Mid-South Pension Fund (“Iron Workers” or the “Fund”) in the above-captioned case. Iron Workers is headquartered in Metairie, Louisiana and is a Taft-Hartley benefit plan established in accordance with the Employee Retirement Income Security Act of 1974. The Fund operates as a trust run by a Board of Trustees, for the benefit of its beneficiaries. Members of the Fund’s Board of Trustees reside in the States of Louisiana, Mississippi, Oklahoma and Texas. During the Class Period, the Fund purchased 4,595 shares of Molycorp, Inc. common stock, including 1,295 shares in connection with the Company’s June 10, 2011 secondary offering. I, on behalf of the Fund, respectfully submit this declaration in support of the Fund’s request for reimbursement of \$560.00 associated with the time spent monitoring and participating in the litigation. I have personal knowledge of the statements herein, and, if called as a witness, could and would testify competently thereto.

2. On July 31, 2012, the Fund presented itself in the Consolidated Class Action Complaint for Violations of Federal Securities Laws as a representative plaintiff in this action. On May 29, 2015, when the First Amended Complaint for Violations of Federal Securities Laws was filed, the Fund elected to continue in its representative capacity. In fulfillment of the Fund’s responsibilities on behalf of similarly situated plaintiffs, I, on behalf of the Fund: (i) reviewed correspondence from and spoke with Robbins Geller Rudman & Dowd LLP about the litigation; (ii) engaged in phone conferences and meetings with Fund Trustees about the litigation; (iii) participated in the litigation and monitored the prosecution of the case; (iv) kept fully informed regarding case status; (v) reviewed documents filed in this action, including operative pleadings and motion to

dismiss briefing; (vi) consulted with counsel regarding the litigation; and (vii) kept abreast about all material aspects of the mediation and settlement negotiations.

3. The Fund understands that in cases such as this, the Court may make an award of reasonable costs and expenses (including lost wages) directly relating to the representation of plaintiffs similarly-situated as the Fund. As a consequence of the services the Fund performed in representing the Class, it incurred expenses associated with monitoring and participating in the litigation. This time included reviewing major pleadings and filings in the case, as well as conferences and correspondence with Robbins Geller Rudman & Dowd LLP. Based on my time records, I spent a total of 2.8 hours on the litigation. The Fund believes that an appropriate hourly rate for these serves is \$200.00. In accordance with this hourly rate, the unreimbursed expenses for the Fund's time expended on the litigation is \$560.00. This unreimbursed time was reasonably and necessarily incurred in connection with services to all similarly-situated plaintiffs in this case and the Fund believes that they are fair and reasonable.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 9<sup>th</sup> day of August 2016, at Metairie, Louisiana.



CHRISTINA L. CARROLL, ESQ.

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

### Electronic Mail Notice List

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### Manual Notice List

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