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Proposed Counsel to the Debtors and Debtors in Possession

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

_____)	Chapter 11
In re:)	
)	
REPUBLIC METALS REFINING)	
CORPORATION, <i>et al.</i> , ¹)	Case No. 18-13359-shl
)	
Debtors.)	(Joint Administration Pending)
_____)	

**NOTICE OF COMMENCEMENT OF CHAPTER 11 CASES AND
HEARING TO CONSIDER “FIRST DAY” MOTIONS**

PLEASE TAKE NOTICE that, on November 2, 2018 (the “Petition Date”), Republic Metals Refining Corporation (“Republic Refining”), Republic Metals Corporation (“Republic Metals”), and Republic Carbon Company, LLC (“Republic Carbon,” together with Republic Refining and Republic Metals, the “Debtors”) as debtors and debtors-in-possession, each filed petitions for relief under Chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York (the “Court”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Republic Metals Refining Corporation, 15 West 47th Street, Suites 206 and 209, New York, NY 10036 (3194), Republic Metals Corporation, 12900 NW 38th Avenue, Miami, FL 33054 (4378), and Republic Carbon Company, LLC, 5295 Northwest 163rd Street, Miami Gardens, FL 33014 (5833).

PLEASE TAKE FURTHER NOTICE that a hearing (the “First Day Hearing”) to consider the Debtors’ motions set forth on **Exhibit A** hereto (collectively the “First Day Pleadings”) has been scheduled by the Court for **November 6, 2018 at 11:00 a.m. (prevailing Eastern Time)**, or as soon thereafter as counsel may be heard, before the Honorable Sean H. Lane, United States Bankruptcy Judge, in Room 701 of the United States Bankruptcy Court, One Bowling Green, New York, NY 10004. The Debtors have requested that the Court consider the relief requested in the First Day Pleadings on a final basis, or, in certain cases, on an interim basis, pending a final hearing to be scheduled at a later date.

PLEASE TAKE FURTHER NOTICE that the Debtors have requested that their chapter 11 cases be consolidated for procedural purposes only and be jointly administered under *Republic Metals Refining Corporation, et. al.*, Case No. 18-13359-shl.

PLEASE TAKE FURTHER NOTICE that copies of the First Day Pleadings and all pleadings and other papers filed in these chapter 11 cases may be obtained by visiting the website of Donlin, Recano & Company, Inc. at <https://www.donlinrecano.com/republicmetals>. You may also obtain copies of any pleadings by: (i) contacting Donlin, Recano & Company, Inc. at 212-771-1128 Donlin, Recano & Company, Inc., Re: Republic Metals Refining Corporation, et al., 6201 15th Avenue, Brooklyn, NY 11219, (ii) accessing the Court’s website at www.nysb.uscourts.gov, or (ii) contacting the Office of the Clerk of the Court at One Bowling Green, New York, New York 10004. Note that a PACER password is needed to access documents on the Court’s website.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the First Day Pleadings carefully and discuss them with your attorney, if you have one in connection with the chapter 11 cases. (If you do not have an attorney, you may wish to

consult with one).

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested in the First Day Pleadings, or if you want the Court to consider your views on the First Day Pleadings, then you or your attorney must attend the First Day Hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the First Day Pleadings and may enter orders granting the relief requested in the First Day Pleadings.

Dated: New York, New York
November 5, 2018

AKERMAN LLP

By: /s/Susan F. Balaschak

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EXHIBIT A

1. Motion of Debtors Pursuant to Fed. R. Bankr. P. 1015(b) for Entry of Order Directing Joint Administration of Chapter 11 Cases [ECF No. 3]
2. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Prepare a List of Creditors in Lieu of Submitting a Formatted Mailing Matrix, and (B) File a Consolidated List of the Debtors' 30 Largest Unsecured Creditors, (II) Approving the Form and Manner of Notifying Creditors of Commencement of these Chapter 11 Cases; and (III) Granting Related Relief [ECF No. 4]
3. Debtors' Motion for Entry of Interim and Final Order (I) Authorizing Debtors to, in the Ordinary Course, (A) Use Cash Management System, Bank Accounts, and Business Forms and (B) Perform Intercompany Transactions, and (II) Authorizing Banks and Financial Institutions to Honor and Process All Related Check and Electronic Payment Requests [ECF No. 5]
4. Debtors' Motion for Entry of Interim and Final Order (I) Authorizing Debtors to (A) Pay Pre-Petition Wages and Other Compensation, and Employee Benefits, and (B) Continue Existing Employee Benefit Plans and Programs, (II) Authorizing Banks and Financial Institutions to Pay All Checks and Electronic Payment Requests, and (III) Approving the Debtors' Discretionary Employee Incentive Programs [ECF No. 6]
5. Debtors' Motion for Interim and Final Order Authorizing the Debtors to Pay Certain Pre-petition Taxes [ECF No. 7]
6. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Determining that Utility Providers Have Been Provided with Adequate Assurance of Payment, (II) Approving Proposed Adequate Assurance Procedures, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, (IV) Determining that Debtors are Not Required to Provide any Additional Assurance, (V) Scheduling a Hearing to Consider Entry of a Final Order, and (IV) Granting Related Relief [ECF No. 8]
7. Debtors' Emergency Motion for Entry of an Order Granting an Extension of Time to File Schedules and Statements [ECF No. 9]
8. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to the Secured Parties, (III) Scheduling a Final Hearing and (IV) Granting Related Relief [ECF No. 10]

9. Motion for an Interim Order Under 11 U.S.C. § 105 and 2002(m), 9007 and 9014 of the Federal Rules of Bankruptcy Procedure (I) Establishing Certain Notice, Case Management, and Administrative Procedures and (II) Scheduling a Final Hearing [ECF No. 12]
10. Debtors' Emergency Motion for Order Approving the Form and Manner of Notice of the Case to Creditors and Parties in Interest [ECF No. 13]
11. Debtors' Emergency Motion for Entry of an Order (I) Authorizing, but Not Directing, Debtors to (A) Maintain Existing Insurance Programs and Existing Insurance Premium Finance Agreement, and (B) Fund All Obligations in Respect Thereof [ECF No. 14]