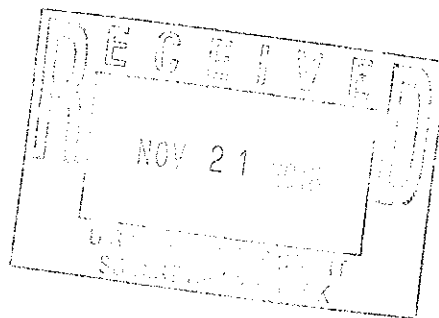


Thomas D. Berghman, Esq.
Texas Bar No. 24082683
MUNSCH HARDT KOPF & HARR, P.C.
500 N. Akard St., Ste. 3800
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E-mail: tberghman@munsch.com



Counsel for Creditor Auris Noble, LLC

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

In re:

REPUBLIC METALS REFINING
CORPORATION, *et al.*,¹

Debtors.

Chapter 11

Case No. 18-13359 (SHL)

(Jointly Administered)

NOTICE OF FILING OF RECLAMATION DEMAND

Creditor, Auris Noble, LLC, hereby gives notice that, on November 20, 2018, it delivered a Reclamation Demand Letter to the above captioned Debtors, a copy of which is attached hereto as Exhibit "A."

Dated: November 20, 2018

Respectfully submitted,

MUNSCH HARDT KOPF & HARR, P.C.
500 N. Akard St., Ste. 3800
Dallas, TX 75201
Phone: 305-358-6300
Attorneys for ARA Gold, LLC

/s/ Thomas Berghman
Thomas D. Berghman, Esq.
tberghman@munsch.com

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 N.W. 38th Avenue, Miami, FL 33054 (4378), and Republic Carbon Company, LLC, 5295 Northwest 163rd Street, Miami Gardens, FL 33014 (5833).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 20th day of November, 2018, I caused a true and correct copy of the foregoing document to be mailed overnight via FedEx to the Clerk of the Bankruptcy Court for the Southern District of New York – Manhattan Division for filing.

/s/ Thomas Berghman
Thomas D. Berghman, Esq.

EXHIBIT “A”

November 20, 2018

By E-Mail and First Class Mail

savila@paladinmgmt.com
Scott Avila
Chief Restructuring Officer
Republic Metals Corporation
12900 NW 38th Avenue
Miami, FL 33054

Re: Reclamation Demand to Republic Metals Corporation
Republic Metals Refining Corporation, et al. (Case No. 18-13359-shl)
Republic Metals Corporation (Case No. 18-13360-shl)

Dear Mr. Avila:

We represent Auris Noble, LLC (“Auris Noble”). Pursuant to section 2-702 of the Uniform Commercial Code and section 546(c) of the US Bankruptcy Code, this letter constitutes a notice of demand for the return of all goods received by Republic Metals Corporation and/or its affiliates (collectively, “Republic”) from Auris Noble within forty-five (45) days of November 2, 2018, the date of the filing of a chapter 11 bankruptcy petition by Republic (the “Petition Date”) including, without limitation, approximately (i) 72.438 ounces of platinum, (ii) 3.515 ounces of palladium, and (iii) 51.563 ounces of gold delivered to Republic on or about September 20, 2018 (collectively, the “Goods”) attached hereto.

We further demand that the Goods currently in your possession be protected and segregated by you and not be used for any purpose whatsoever, except by agreement of the parties or following notice and a hearing by the Bankruptcy Court or other court of competent jurisdiction. You may not sell, dissipate, or commingle the Goods with any other goods.

This reclamation demand is made without prejudice to any other rights or remedies available to us, at law or in equity, including, but not limited to, our right to an administrative expense claim under section 503(b)(9) of the Bankruptcy Code for all goods received by you on or after twenty (20) days before the Petition Date.

Please contact the undersigned immediately for instructions regarding the return of the Goods. If you do not authorize the return of the Goods promptly, we reserve the right to take further appropriate measures.

Sincerely,

Munsch Hardt Kopf & Harr, P.C.

/s/ Thomas Berghman

Thomas D. Berghman, Esq.

cc: Akerman LLP
2001 Ross Avenue, Suite 3600
Dallas, TX 75201
Attn: John Mitchell, Esq. (john.mitchell@akerman.com)

Akerman LLP
98 Southeast Seventh Street, Suite 1100
Miami, FL 33131
Attn: Andrea Hartley, Esq.(andrea.hartley@akerman.com)
Katherine C. Fackler, Esq. (katherine.fackler@akerman.com)

Exhibit A



AURIS NOBLE, LLC

Auris Noble LLC

3045 Smith Rd Suite 700

Fairlawn OH 44333

Phone: 330-321-6649 :: Fax: 1-330-319-8162

E-Mail: patrick@aurisnoble.com Web: http://www.aurisnoble.com

Auris Noble, R-2837

3045 Smith Rd Ste 700, Fairlawn, Ohio, 44333, United States Phone: 330-321-6649 Email:patrick@aurisnoble.com

Sold To: RMC2, A division of Republic Metals Corporation

12900 NW 38th Avenue, Miami, FL 33054 Phone: (305)685-8505 Email:customerservice@republicmetalscorp.com www.republicmetalscorp.com

Date: 09/19/2018

Sale Invoice number: TBD

Package Material Description

2,424.86 g (net w/out bag) PtPd mixed solids

Total Special Instructions:

Weight

2,424.86 g (net)

Value

\$68,900.00

Warranty of Title:Customer warrants to RMC2 that it has good and marketable title to said property, full authority to sell and transfer said property, and that said property is sold free of all lie whatsoever; the Customer further warrants that the said property is not from, or the result of, illegal activity in this country or any other country. Customer further warrants to RMC2 that it will claim thereto. Customer warrants that any transaction initiated by Customer will not cause RMC2 to be in violation of any anti-money laundering, anti-terrorism, or other applicable law of the 1 they have a satisfactory Patriot Act compliance program and that any and all customers with whom they deal are in compliance of said program. Customer warrants that any and all material del requirements.

HIGH GRADE METAL REPORT

LOT: RL161520

PT/PD POWDER W/ SOLIDS



DATE RECEIVED: 9/20/2018

UPS#: 1z26w97v018962671

Exhibit B

RMC2
12900 N.W. 38th Avenue
Miami, FL 33054
Phone 888-685-8505
Fax 305-685-8506
<http://rmctwo.com>



CUSTOMER: R2837
JURIS NOBLE LLC.
JAMES DEERING
1045 SMITH ROAD SUITE 700
FAIRLAWN, OH 44333
PHONE (330) 321-6649
FAX (330) 319-8162

WEIGHT	GRAMS	TROY OUNCES
BEFORE MELT	2,430.40	78.139
AFTER MELT TOTAL	2,413.60	77.598

	ASSAY	FINE TROY OUNCES	ACCOUNTABILITY	PAYABLE OUNCES
Platinum	93.3500%	72.438	97.000 %	70.264
Palladium	4.5300%	3.515	95.000 %	3.339

TERMS AND CONDITIONS ACCEPTED BY

MINIMUM LOT CHARGE \$100 FOR UNDER 50 OZS FINE GOLD CONTAINED
OVER ADVANCED CHARGES \$1.00 PER OZ PER DAY. MINIMUM CHARGE \$150.00
NOTE: If weights or number of pieces specified are found to be incorrect, please advise our sales

DATE RECEIVED: 9/20/2018

HIGH GRADE METAL REPORT



Exhibit C

LOT: RL161519

AU HIGH GRADE BARS

RMC2
12900 N.W. 38th Avenue
Miami, FL 33054
Phone 888-685-8505
Fax 305-685-8506
<http://rmctwo.com>



CUSTOMER: R2837
AURIS NOBLE LLC.
JAMES DEERING
1045 SMITH ROAD SUITE 700
FAIRLAWN, OH 44333
PHONE (330) 321-6649
FAX (330) 319-8162

WEIGHT	GRAMS	TROY OUNCES
BEFORE MELT	1,605.50	51.617
AFTER MELT TOTAL	1,605.10	51.605

Gold	ASSAY 99.9200%	FINE TROY OUNCES 51.563	ACCOUNTABILITY 99.500 %	PAYABLE OUNCES 51.305
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TERMS AND CONDITIONS ACCEPTED BY

MINIMUM LOT CHARGE \$100 FOR UNDER 50 OZS FINE GOLD CONTAINED
OVER ADVANCED CHARGES \$1.00 PER OZ PER DAY. MINIMUM CHARGE \$150.00
NOTE: If weights or number of pieces specified are found to be incorrect, please advise our sales

Exhibit D



AURIS NOBLE, LLC

Auris Noble LLC

3045 Smith Rd Suite 700

Fairlawn OH 44333

Phone: 330-321-6649 :: Fax: 1-330-319-8162

E-Mail: patrick@aurisnoble.com Web: http://www.aurisnoble.com

Auris Noble, R-2837

3045 Smith Rd Ste 700, Fairlawn, Ohio, 44333, United States Phone: 330-321-6649 Email:patrick@aurisnoble.com

Sold To: RMC2, A division of Republic Metals Corporation

12900 NW 38th Avenue, Miami, FL 33054 Phone: (305)685-8505 Email:customerservice@republicmetalscorp.com www.republicmetalscorp.com

Date: 09/19/2018

Sale Invoice number: TBD

Package Material Description

1,599.16 g (net w/out bag) Au solids

Total Special Instructions:

Weight

1,599.16 g (net)

Value

\$61,961.00

Warranty of Title: Customer warrants to RMC2 that it has good and marketable title to said property, full authority to sell and transfer said property, and that said property is sold free of all liens whatsoever; the Customer further warrants that the said property is not from, or the result of, illegal activity in this country or any other country. Customer further warrants to RMC2 that it will claim thereto. Customer warrants that any transaction initiated by Customer will not cause RMC2 to be in violation of any anti-money laundering, anti-terrorism, or other applicable law of the U.S. that they have a satisfactory Patriot Act compliance program and that any and all customers with whom they deal are in compliance of said program. Customer warrants that any and all material delinquencies are reported to the appropriate authorities.

Pool Statement - All Metals
 RMC2
 09/03/18, 10/22/18

Exhibit E

R2837
 AURIS NOBLE LLC.
 JAMES DEERINGER
 FAIRLAWN-OH-44333
 Fax: (330) 319-8162

Document No.	Posting Date	Au	Bal.	Ag	Bal.	Pt	Bal.	Pd	Bal.	Rh	Bal.	Ir	Bal.	Cu	Bal.	Ru	B
Beginning Balances:		0.000	0.000	910.039	910.039	120.805	70.805	15.189	15.189	5.222	0.000	0.000	0.000	0.000	0.000	0.000	0.000
MAJ9820	09/11/18	0.000	0.000	0.000	910.039	-50.000	70.805	0.000	15.189	-5.222	0.000	0.000	0.000	0.000	0.000	0.000	0.000
FL161519	09/20/18	51.305	51.305	0.000	910.039	0.000	70.805	0.000	15.189	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
FL161520	09/20/18	0.000	51.305	0.000	910.039	70.264	140.869	3.339	18.528	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
MAJ9828	10/01/18	-26.305	25.000	0.000	910.039	-25.000	115.869	0.000	18.528	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000

Handwritten annotations on the table:
 - A box around 25.000 with an arrow pointing to the Au column of the MAJ9828 row.
 - A box around 70.264 with an arrow pointing to the Pt column of the FL161520 row.
 - A box around 3.39 with an arrow pointing to the Pd column of the FL161520 row.
 - Text: "sold 25.000 on 10/12/18" with an arrow pointing to the MAJ9828 row.
 - Text: "sold 15.869 on 10/12/18" with an arrow pointing to the Pt column of the MAJ9828 row.
 - Text: "sold all on 10/12/18" with an arrow pointing to the Rh column of the MAJ9828 row.

Boxed amounts represent material that should be returned to Auris Noble LLC.