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

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

**NOTICE OF AGENDA FOR MATTERS SCHEDULED FOR
THE HEARING ON JANUARY 23, 2019 AT 11:00 A.M.**

Time and Date of Hearing: January 23, 2019 at 11:00 a.m. (Prevailing Eastern Time)

Location of Hearing: United States Bankruptcy Court for the Southern District of New York, before the Honorable Sean H. Lane, United States Bankruptcy Judge, **Room 701**, One Bowling Green, New York, NY 10004-1408

PLEASE TAKE NOTICE that an agenda with respect to all matters set for hearing on **January 23, 2019 at 11:00 a.m.** (EST) is set forth below. Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Court’s website at www.nysb.uscourts.gov, (ii) contacting the Office of the Clerk of Court at One Bowling Green, New York, New York 10004, or (iii) from the Debtors’ claims and noticing agent, Donlin

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), Republic Carbon Company, LLC, 5295 Northwest 163rd Street, Miami Gardens, FL 33014 (5833), Republic High Tech Metals, LLC, 13001 NW 38th Avenue, Miami, FL 33054 (6102), RMC Diamonds, LLC, 12900 NW 38th Avenue, Miami, FL 33054 (1507), RMC2, LLC, 12900 NW 38th Avenue, Miami, FL 33054 (4696), J & L Republic LLC, 12900 NW 38th Avenue, Miami, FL 33054 (7604); R & R Metals, LLC, 12900 NW 38th Avenue, Miami, FL 33054 (7848), Republic Metals Trading (Shanghai) Co., Ltd., 276 Ningbo Road, Huangpu District, Shanghai, P.R. 200001 China (1639), and Republic Trans Mexico Metals, S.R.L., Francisco I. Madero No. 55 Piso 5, Local 409, Centro Joyero Edificio Central, Delegación Cuauhtémoc, Mexico DF 6000 (2942).

Recano ("Donlin"), at www.donlinrecano.com/republicmetals. Note that a PACER password is required to access documents on the Court's website.

AGENDA

A. Status Conference

- i. Case Status Update
- ii. Order Approving Uniform Procedure for Resolution of Ownership Disputes [ECF No. 54]

B. Uncontested Matters

1. Application of Debtors Pursuant to 11 U.S.C. §§ 327(a), 330 and 331 and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure for an Order Authorizing the Employment and Retention of Donlin, Recano & Company as Administrative Agent for the Debtors, *Nunc Pro Tunc* to the Petition Date [ECF No. 339]

- a. Response Deadline: January 16, 2019 at 4:00 p.m. (ET)
- b. Responses Received: None
- c. Related Documents: None
- d. Status: Going forward on final basis.

C. Contested Matters

1. Motion to Approve Omnibus Objection Procedures for Resolution of Reclamation Demands [ECF No. 303]

- a. Response Deadline: January 16, 2019 at 4:00 p.m. (ET)
- b. Responses Received:
 - i. Limited Objection filed by Queen of Pawns & Jewelry, Inc. [ECF No. 406]
 - ii. Objection filed by Midwest Refineries, LLC [ECF No. 414]
 - iii. Joint Limited Objection of Certain Customers [ECF No. 418]
- c. Related Documents: None
- d. Status: Going forward on final basis

2. 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]

a. Response Deadline: November 21, 2018 at 4:00 p.m.

b. Responses Received:

- i. Limited Objection of Alamos Gold Inc. and its Subsidiaries, Minas de Oro Nacional, S.A. de C.V. and Minera Santa Rita S. de R.L. de C.V. to the Debtors Cash Collateral Motion and Supplement to the Cash Collateral Motion [ECF No. 121]
- ii. Limited Objection of Cornerstone Asset Metals LLC to Debtors' Motion to Use Cash Collateral [ECF No. 135]
- iii. Limited Objection SCMI US Inc. to the Debtors' Cash Collateral Motion and Joint Supplement to the Cash Collateral Motion [ECF No. 137]
- iv. Limited Objection of Premier Gold Mines Limited to Debtors' Motion for Entry of Final Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection of the Secured Parties and (III) Granting Related Relief [ECF No. 144]
- v. Objection of Coeur Mining, Inc., Coeur Mexicana S.A. De C.V., Coeur Rochester, Inc. and Wharf Resources (U.S.A.), Inc. to (A) Debtors' Motion for Entry of Final Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection of the Secured Parties and (III) Granting Related Relief, and (B) Joint Supplement of the Debtors and the Senior Lenders to the Cash Collateral Motion [ECF No. 146]
- vi. Joint Objection of Argonaut Gold Inc., First Majestic Silver Corp., and Mitchell T. Levine to 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. 147]
- vii. Objection of Midwest Refineries, LLC to Entry of Final Case Collateral [sic] Order [ECF No. 148]
- viii. Limited Objection and Reservation of Rights Re: Debtor's Motion for Use of Cash Collateral filed by Alex Morningstar Corp., Deb Schott, Inc., FCP Diamonds, LLC, Mid-States Recycling, Inc., and Noble Metal Services, Inc. [ECF No. 152]

- ix. Texas Precious Metals L.L.C.'s Joinder and Limited Objection to the Debtors' Cash Collateral Motion and Supplement to the Cash Collateral Motion and Reservation of Rights [ECF No. 154]
- x. Texas Precious Metals L.L.C.'s Joinder and Limited Objection to the Debtors' Cash Collateral Motion and Supplement to the Cash Collateral Motion and Reservation of Rights [ECF No. 156]
- xi. Limited Objection of Music City Group, LLC to Debtors' Motion to Use Cash Collateral [ECF No. 157]
- xii. Limited Objection of Minas de Oroco Resources, S.A. de C.V. to Debtors' Motion to Use Cash Collateral [ECF No. 158]
- xiii. Limited Objection of Tiffany and Company, on its own behalf and on behalf of Laurelton Sourcing, LLC to (A) Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection of the Secured Parties, (III) Scheduling a Final Hearing and (IV) Granting Related Relief, and (B) Joint Supplement of the Debtors and the Senior Lenders to the Cash Collateral Motion [ECF No. 159]
- xiv. Objection of Pretium Exploration Inc. to the Debtors' Motion for Entry of a Final Order (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. 161]
- xv. Yamana Gold Inc.'s Limited Objection to 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. 162]
- xvi. Limited Objection of Design Gold Group, Inc. to Motion to (I) Approve Use of Cash Collateral, (II) Granting Adequate Protection to the Secured Parties, and (III) Scheduling a Final Hearing [ECF No. 163]
- xvii. Limited Objection of Pyropure, Inc. D/B/A Pyromet to the Debtors' Cash Collateral Motion and Supplement to the Cash Collateral Motion [ECF No. 164]
- xviii. Limited Objection, Joinder and Reservation of Rights Concerning Debtors' Motion Seeking Authorization to Use Cash Collateral and Certain Related Relief filed by 7645635 Canada Inc. o/a Ottawa Gold Buyer, Pollock-Cameron Investments Corporation o/a Vancouver Gold Buyer, and 7907109 Canada Inc. [ECF No. 174]

- xix. Objection, Joinder, and Reservation of Rights of Compania Minera Dolores, S.A. de C.V. and Minera Triton Argentina SA to the 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. 178]
 - xx. So Accurate Group, Inc.'s Limited Objection, Joinder, and Reservation of Rights to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors' Use of Cash Collateral, (II) Granting Adequate Protection to the Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [ECF No. 181]
 - xxi. Limited Objection of Brilliant Jewelers/MJJ Inc. to Debtors' Cash Collateral Motion and Supplement to the Cash Collateral Motion and Reservation of Rights [ECF No. 185]
 - xxii. APMEX, Inc.'s Joinder and Limited Objection to the Debtors' Cash Collateral Motion and Supplement to the Cash Collateral Motion and Reservation of Rights [ECF No. 189]
 - xxiii. Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of Interim and Final Orders (i) Authorizing the Debtors' Use of Cash Collateral, (ii) Granting Adequate Protection to the Secured Parties, (iii) Scheduling a Final Hearing and (iv) Granting Related Relief, and the Supplemental Motion [ECF No. 193]
- c. Related Documents:
- i. Notice of Proposed Amended Cash Collateral Budget [ECF No. 32]
 - ii. Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [ECF No. 54]
 - iii. Joint Supplement of the Debtors and the Senior Lenders to the Cash Collateral Motion [ECF No. 78]
 - iv. Notice of Filing Proposed Order [ECF No. 167]
 - v. Motion of Coeur Mining, Inc., Coeur Mexicana S.A. De C.V., Coeur Rochester, Inc. and Wharf Resources (U.S.A.), Inc. to (a) File Documents under Seal and (b) Redact Commercially Sensitive, Nonpublic Information [ECF No. 145]

- vi. Yamana Gold, Inc. Ex Parte Motion for Entry of an Order to (i) File a Document Under Seal and (ii) Redact Commercially Sensitive, Nonpublic Information [ECF No. 165]
- vii. Declaration of Atul Kampani in Support of Limited Objection of Brilliant Jewelers/MJJ Inc. to Debtor's Final Motion to Use Cash Collateral, Granting Adequate Protection, Etc. [ECF No. 186]
- viii. Notice of Submission of Second Interim Cash Collateral Order [ECF No. 255]
- ix. Notice of Proposed Counter-Order [ECF No. 260]
- x. Second Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [ECF No. 277]
- xi. Notice of Filing Proposed Third Interim Cash Collateral Order [ECF No. 318]
- xii. Notice of Filing Proposed Third Interim Cash Collateral Budget [ECF No. 323]
- xiii. Third Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [ECF No. 373]

d. Status: Going forward on interim basis

3. Motion of Coeur Mining, Inc. to (a) File Documents Under Seal and (b) Redact Commercially Sensitive, Nonpublic Information [ECF No. 145]

a. Response Deadline: N/A

b. Responses Received: informal comments from United States Trustee

c. Related Documents: proposed Order resolving United States Trustee's comments submitted at ECF No. 334

d. Status: The parties respectfully request the Court enter the proposed Order at ECF No 334.

4. Yamana Gold, Inc. Ex Parte Motion for Entry of an Order to (i) File a Document under Seal and (b) Redact Commercially Sensitive, Nonpublic Information [ECF No. 165]

a. Response Deadline: N/A

- b. Responses Received: informal comments from United States Trustee
 - c. Related Documents: proposed Order resolving United States Trustee's comments submitted at ECF No. 366
 - d. Status: The parties respectfully request the Court enter the proposed Order at ECF No 366.
5. Debtors' Motion for Authority to Pay Certain Discretionary Employee Bonuses Pursuant to 11 U.S.C. §§ 105 and 363 [ECF No. 276]
- a. Response Deadline: January 16, 2019 at 4:00 p.m. (ET)
 - b. Responses Received:
 - i. Objection filed by Fundacion Rafael Donde, I.A.P. [ECF No. 417]
 - ii. Debtors' Reply to Objection [ECF No. 457]
 - c. Related Documents: None
 - d. Status: Going forward on final basis
6. Debtors' Motion for Authority to Pay Attorneys' Fees of Certain Debtor Representatives Pursuant to 11 U.S.C. §§ 105(a) and 363(b) [ECF No. 368]
- a. Response Deadline: January 16, 2019 at 4:00 p.m. (ET)
 - b. Responses Received:
 - i. Objection filed by Fundacion Rafael Donde, I.A.P. [ECF No. 417]
 - ii. Debtors' Reply to Objection [ECF No. 457]
 - c. Related Documents: None
 - d. Status: Going forward on final basis
7. Motion of the United States Trustee for the Entry of an Order Directing the Appointment of a Chapter 11 Examiner [ECF No. 325]
- a. Response Deadline: January 16, 2019 at 4:00 p.m. (ET)
 - b. Responses Received:
 - i. Objection filed by Senior Lenders [ECF No. 413]
 - ii. Joint Opposition filed by Certain Customers [ECF No. 415]
 - iii. Objection filed by the Official Committee of Unsecured Creditors [ECF No. 416]

- iv. Objection filed by the Debtors' [ECF No. 420]
- c. Related Documents:
 - i. Notice of Adjournment of Hearing [ECF No. 361]
- d. Status: Going forward on final basis

Dated: January 22, 2019

AKERMAN LLP

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