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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

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

Debtors.

Chapter 11

Case No. 18-13359 (SHL)

(Jointly Administered)

**MIDWEST REFINERIES, LLC'S RESPONSE
TO OMNIBUS OBJECTION TO ALL RECLAMATION CLAIMS**

Midwest Refineries, LLC ("Midwest"), by its counsel, submits its Response to the *Omnibus Objection to All Reclamation Claims* [Doc. No. 640] (the "Objection") as follows:

1. Debtors have objected to Midwest's reclamation claim on the basis that the "Reclamation Demand is subordinate to Senior Lenders' liens."

2. Midwest relies on its Customer Statement [Doc. No. 449] as its Response to the Objection, as permitted by the *Corrected Amended Order Approving Omnibus Objections Procedures for Resolution of Reclamation Demands and Setting Preliminary Hearing* [Doc. No. 626].

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 Re-public Carbon Company, LLC, 5295 Northwest 163rd Street, Miami Gardens, FL 33014 (5833).

WHEREFORE, Midwest Refineries, LLC requests that the Debtors' objection to its
reclamation demand be denied.

Dated: March 11, 2019

Respectfully submitted,
MCELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP

/s/Nicole Leonard

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