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Counsel to the Debtors and Debtors in Possession

**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)

**DEBTORS' OMNIBUS RULE 26(a)(1)(A) INITIAL DISCLOSURES
PURSUANT TO UNIFORM PROCEDURES ORDER**

Republic Metals Refining Corporation, *et al.* (collectively the “Debtors”) hereby file their initial disclosures pursuant to the Court's *Order Approving Uniform Procedures for Resolution of Ownership Disputes* (ECF No. 395, the “Procedures Order”). See Procedures Order, ¶ 3(c). These disclosures are based upon information reasonably available to the Debtors. The Debtors are continuing to investigate and discovery may alter these disclosures. The Debtors reserve the right to amend and supplement the information provided herein, and/or revise inadvertent or undiscovered errors as discovery progresses.

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 38 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).

The Debtors do not represent that any particular document exists within their possession, custody or control by making these disclosures.

The Debtors make these disclosures without waiver of, or prejudice to, their rights or objections.

The Debtors expressly reserve the right to identify and call as witnesses additional persons if the Debtors learn such additional persons have knowledge of relevant matters during the course of discovery.

The Debtors make these disclosures subject to and without limiting any of the foregoing. The Debtors make these disclosures in the belief that an appropriate confidentiality order and rational production limitations can and will be agreed upon by counsel at an appropriate time.

RULE 26 DISCLOSURES

Rule 26(a)(1)(A)(i). The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

Witnesses who are intended solely for impeachment are not covered by the provision of Rule 26(a)(1)(A)(i) of the Federal Rules of Civil Procedure. Plaintiff reserves the right to supplement his disclosures under Rule 26(e)(1)(A) of the Federal Rules of Civil Procedure.

Names	Contact Information	Subjects of Information
Record Custodians of the Debtors	<p>c/o John E. Mitchell, Esq. Yelena Archiyan, Esq. AKERMAN LLP 2001 Ross Ave., Ste. 3600 Dallas, TX 75201 Telephone: 214-720-4300 john.mitchell@akerman.com yelena.archiyan@akerman.com</p> <p>and</p> <p>Andrea S. Hartley, Esq. Joanne Gelfand, Esq. Katherine C. Fackler, Esq. AKERMAN LLP 98 Southeast Seventh St., Ste. 1100 Miami, FL 33131 Telephone: 305-374-5600 andrea.hartley@akerman.com joanne.gelfand@akerman.com katherine.fackler@akerman.com</p>	The Debtors shall designate custodians of the Debtors' records. The Debtors have knowledge regarding the Debtors' books and records.
Scott Avila	<p>c/o John E. Mitchell, Esq. Yelena Archiyan, Esq. AKERMAN LLP 2001 Ross Ave., Ste. 3600 Dallas, TX 75201 Telephone: 214-720-4300 john.mitchell@akerman.com yelena.archiyan@akerman.com</p> <p>and</p> <p>Andrea S. Hartley, Esq. Joanne Gelfand, Esq. Katherine C. Fackler, Esq. AKERMAN LLP 98 Southeast Seventh St., Ste. 1100 Miami, FL 33131 Telephone: 305-374-5600 andrea.hartley@akerman.com joanne.gelfand@akerman.com katherine.fackler@akerman.com</p>	Scott Avila is the Debtors' Chief Restructuring Officer. Mr. Avila has knowledge regarding the Debtors' day-to-day operations, business, financial affairs, and books and records.

Names	Contact Information	Subjects of Information
Jason Rubin	<p><u>Corporate Counsel:</u> c/o John E. Mitchell, Esq. Yelena Archiyan, Esq. AKERMAN LLP 2001 Ross Ave., Ste. 3600 Dallas, TX 75201 Telephone: 214-720-4300 john.mitchell@akerman.com yelena.archiyan@akerman.com</p> <p>and</p> <p>Andrea S. Hartley, Esq. Joanne Gelfand, Esq. Katherine C. Fackler, Esq. AKERMAN LLP 98 Southeast Seventh St., Ste. 1100 Miami, FL 33131 Telephone: 305-374-5600 andrea.hartley@akerman.com joanne.gelfand@akerman.com katherine.fackler@akerman.com</p> <p><u>Personal Counsel:</u> Jeffrey P. Bast, Esq. BAST AMRON LLP SunTrust International Center One Southeast 3rd Ave, Ste. 1400 Miami, Florida 33131 Telephone: 305-379-7904 jbast@bastamron.com</p>	<p>Mr. Rubin is the Debtors' President and Chief Executive Officer. Mr. Rubin has knowledge regarding the Debtors' day-to-day operations, business, financial affairs, and books and records.</p>
David Comite	<p>c/o John E. Mitchell, Esq. Yelena Archiyan, Esq. AKERMAN LLP 2001 Ross Ave., Ste. 3600 Dallas, TX 75201 Telephone: 214-720-4300 john.mitchell@akerman.com yelena.archiyan@akerman.com</p> <p>and</p> <p>Andrea S. Hartley, Esq. Joanne Gelfand, Esq. Katherine C. Fackler, Esq. AKERMAN LLP 98 Southeast Seventh St., Ste. 1100 Miami, FL 33131 Telephone: 305-374-5600 andrea.hartley@akerman.com joanne.gelfand@akerman.com katherine.fackler@akerman.com</p>	<p>Mr. Comite is the Debtors' Treasurer and Chief Financial Officer. Mr. Comite has knowledge regarding the Debtors' day-to-day operations, business, financial affairs, and books and records.</p>

Names	Contact Information	Subjects of Information
Alan Silverstein	<p>c/o John E. Mitchell, Esq. Yelena Archiyan, Esq. AKERMAN LLP 2001 Ross Ave., Ste. 3600 Dallas, TX 75201 Telephone: 214-720-4300 john.mitchell@akerman.com yelena.archiyan@akerman.com</p> <p>and</p> <p>Andrea S. Hartley, Esq. Joanne Gelfand, Esq. Katherine C. Fackler, Esq. AKERMAN LLP 98 Southeast Seventh St., Ste. 1100 Miami, FL 33131 Telephone: 305-374-5600 andrea.hartley@akerman.com joanne.gelfand@akerman.com katherine.fackler@akerman.com</p>	Mr. Silverstein was the Debtors' general counsel. Mr. Silverstein has knowledge regarding the Debtors' contracts with certain customers.
Luis Pena	<p>c/o John E. Mitchell, Esq. Yelena Archiyan, Esq. AKERMAN LLP 2001 Ross Ave., Ste. 3600 Dallas, TX 75201 Telephone: 214-720-4300 john.mitchell@akerman.com yelena.archiyan@akerman.com</p> <p>and</p> <p>Andrea S. Hartley, Esq. Joanne Gelfand, Esq. Katherine C. Fackler, Esq. AKERMAN LLP 98 Southeast Seventh St., Ste. 1100 Miami, FL 33131 Telephone: 305-374-5600 andrea.hartley@akerman.com joanne.gelfand@akerman.com katherine.fackler@akerman.com</p>	Mr. Pena has knowledge regarding the Debtors' contracts with certain customers.

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Joseph Liberman	<p>c/o John E. Mitchell, Esq. Yelena Archiyan, Esq. AKERMAN LLP 2001 Ross Ave., Ste. 3600 Dallas, TX 75201 Telephone: 214-720-4300 john.mitchell@akerman.com yelena.archiyan@akerman.com</p> <p>and</p> <p>Andrea S. Hartley, Esq. Joanne Gelfand, Esq. Katherine C. Fackler, Esq. AKERMAN LLP 98 Southeast Seventh St., Ste. 1100 Miami, FL 33131 Telephone: 305-374-5600 andrea.hartley@akerman.com joanne.gelfand@akerman.com katherine.fackler@akerman.com</p>	Mr. Liberman has knowledge regarding RTMM’s day-to-day operations, business, financial affairs, and customer contracts.
Corporate representative (or records custodian) of Coöperatieve Rabobank U.A., New York Branch (“ <u>Rabobank</u> ”)	<p>c/o Michael Luskin Richard Stern Alex Talesnick LUSKIN, STERN & EISLER LLP Eleven Times Square New York, New York 10036 Telephone: (212) 597-8200 E-Mail: luskin@lsellp.com E-Mail: stern@lsellp.com E-Mail: talesnick@lsellp.com</p>	Rabobank, one of the Senior Lenders, ² has knowledge regarding its agreements with the Debtors, including credit agreements, master netting agreements and/or lease agreements and the obligations of the parties thereunder.
Corporate representative (or records custodian) of Brown Brothers Harriman & Co. (“ <u>BBH</u> ”)	<p>c/o Michael Luskin Richard Stern Alex Talesnick LUSKIN, STERN & EISLER LLP Eleven Times Square New York, New York 10036 Telephone: (212) 597-8200 E-Mail: luskin@lsellp.com E-Mail: stern@lsellp.com E-Mail: talesnick@lsellp.com</p>	BBH, one of the Senior Lenders, has knowledge regarding its agreements with the Debtors, including credit agreements, master netting agreements and/or lease agreements and the obligations of the parties thereunder.

² Capitalized terms not otherwise defined herein are used as defined in the Procedures Order.

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<p>Corporate representative (or records custodian) of Bank Hapoalim B.M. (“<u>Hapoalim</u>”)</p>	<p>c/o Michael Luskin Richard Stern Alex Talesnick LUSKIN, STERN & EISLER LLP Eleven Times Square New York, New York 10036 Telephone: (212) 597-8200 E-Mail: luskin@lsellp.com E-Mail: stern@lsellp.com E-Mail: talesnick@lsellp.com</p>	<p>Hapoalim, one of the Senior Lenders, has knowledge regarding its agreements with the Debtors, including credit agreements, master netting agreements and/or lease agreements and the obligations of the parties thereunder.</p>
<p>Corporate representative (or records custodian) of Mitsubishi International Corporation (“<u>Mitsubishi</u>”)</p>	<p>c/o Michael Luskin Richard Stern Alex Talesnick LUSKIN, STERN & EISLER LLP Eleven Times Square New York, New York 10036 Telephone: (212) 597-8200 E-Mail: luskin@lsellp.com E-Mail: stern@lsellp.com E-Mail: talesnick@lsellp.com</p>	<p>Mitsubishi, one of the Senior Lenders, has knowledge regarding its agreements with the Debtors, including credit agreements, master netting agreements and/or lease agreements and the obligations of the parties thereunder.</p>
<p>Corporate representative (or records custodian) of ICBC Standard Bank Plc (“<u>ICBCS</u>”)</p>	<p>c/o Michael Luskin Richard Stern Alex Talesnick LUSKIN, STERN & EISLER LLP Eleven Times Square New York, New York 10036 Telephone: (212) 597-8200 E-Mail: luskin@lsellp.com E-Mail: stern@lsellp.com E-Mail: talesnick@lsellp.com</p>	<p>ICBCS, one of the Senior Lenders, has knowledge regarding its agreements with the Debtors, including credit agreements, master netting agreements and/or lease agreements and the obligations of the parties thereunder.</p>
<p>Corporate representative (or records custodian) of Techemet Metal Trading LLC (“<u>Techemet</u>”)</p>	<p>c/o Michael Luskin Richard Stern Alex Talesnick LUSKIN, STERN & EISLER LLP Eleven Times Square New York, New York 10036 Telephone: (212) 597-8200 E-Mail: luskin@lsellp.com E-Mail: stern@lsellp.com E-Mail: talesnick@lsellp.com</p>	<p>Techemet, one of the Senior Lenders, has knowledge regarding its agreements with the Debtors, including credit agreements, master netting agreements and/or lease agreements and the obligations of the parties thereunder.</p>
<p>Corporate representative (or records custodian) of Woodforest National Bank (“<u>Woodforest</u>”)</p>	<p>c/o Michael Luskin Richard Stern Alex Talesnick LUSKIN, STERN & EISLER LLP Eleven Times Square New York, New York 10036 Telephone: (212) 597-8200 E-Mail: luskin@lsellp.com E-Mail: stern@lsellp.com E-Mail: talesnick@lsellp.com</p>	<p>Woodforest, one of the Senior Lenders, has knowledge regarding its agreements with the Debtors, including credit agreements, master netting agreements and/or lease agreements and the obligations of the parties thereunder.</p>

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<p>Corporate representative (or records custodian) of Bank Leumi ("<u>Leumi</u>")</p>	<p>c/o Michael Luskin Richard Stern Alex Talesnick LUSKIN, STERN & EISLER LLP Eleven Times Square New York, New York 10036 Telephone: (212) 597-8200 E-Mail: luskin@lsellp.com E-Mail: stern@lsellp.com E-Mail: talesnick@lsellp.com</p>	<p>Leumi, one of the Senior Lenders, has knowledge regarding its agreements with the Debtors, including credit agreements, master netting agreements and/or lease agreements and the obligations of the parties thereunder.</p>
<p>Corporate representative (or records custodian) of Action Forklift, Inc. ("<u>Action Forklift</u>")</p>	<p>c/o Frank J. Corigliano THE O'REILLY LAW FIRM 1961 Route 6 Second Floor Carmel, NY 10512 Telephone: 845-225-5800 fcorigliano@mahopaclawyer.com</p>	<p>Action Forklift, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of Alamos Gold Inc., Minas de Oro Nacional, S.A. de C.V., Minera Santa Rita S. de R.L. de C.V. ("<u>Alamos</u>")</p>	<p>c/o Alison D. Bauer William F. Gray TORYS LLP 1114 Avenue of the Americas 23rd Floor New York, New York 10036 Tel: 212.880.6000 Fax: 212.682.0200 abauer@torys.com wgray@torys.com</p>	<p>Alamos, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of Alex Morningstar Corp. d/b/a Morningstar's ("<u>Alex Morningstar</u>")</p>	<p>c/o Robert Fleischer Kellianne Baranowsky GREEN & SKLARZ LLC 700 State Street, Suite 100 New Haven, CT 06511 (203) 285-8545 rfleischer@gs-lawfirm.com kbaranowsky@gs-lawfirm.com</p>	<p>Alex Morningstar, one of the Customers, has knowledge regarding its claims against the Debtors</p>

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<p>Corporate representative (or records custodian) of APMEX, Inc. ("<u>APMEX</u>")</p>	<p>c/o Howard P. Magaliff RICH MICHAELSON MAGALIFF, LLP 335 Madison Avenue 9th Floor New York, NY 10017 Telephone: 646-453-7851 hmagaliff@r3mlaw.com</p> <p>and</p> <p>William H. Hoch, III CROWE & DUNLEVY, P.C. 324 N. Robinson Avenue Suite 100 Oklahoma City, OK 73102 Telephone: 405-235-7700 will.hoch@crowedunlevy.com</p>	<p>APMEX, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of Argonaut Gold Inc. and Compania Minera Pitalla, S.A. de C.V., and Minera Real del Oro S.A. de C.V. ("<u>Argonaut</u>")</p>	<p>c/o Janice B. Grubin LECLAIRRYAN 885 Third Avenue, Sixteenth Floor New York, NY 10022 T: 212-697-6555 F: 212-986-3509 Janice.Grubin@leclairryan.com</p>	<p>Argonaut, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of Bay Area Metals ("<u>BAM</u>")</p>	<p>c/o Shelley S. Buchanan BUCHANAN LAW 912 Cole Street PMB 120 San Francisco, CA 94117-4316 Telephone: 628-256-3493 ssbuchananlaw@gmail.com</p>	<p>BAM, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of Bayside Metal Exchange ("<u>Bayside</u>")</p>	<p>c/o Donna H. Lieberman HALPERIN BATTAGLIA BENZIJA, LLP 40 Wall Street 37th Floor New York, NY 10005 Telephone: 212-765-9100 dlieberman@halperinlaw.net</p>	<p>Bayside, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of BGASC, LLC ("<u>BGASC</u>")</p>	<p>c/o Brian McGilvray LAW OFFICES OF BRIAN MCGILVRAY 5850 Canoga Avenue Suite 400 Woodland Hills, CA 91367 Telephone: 888-992-4272 bmcgilvray@mcgilvray.com</p>	<p>BGASC, one of the Customers, has knowledge regarding its claims against the Debtors</p>

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<p>Corporate representative (or records custodian) of Brilliant Jewelers/MJJ Inc. and Anjay Corp. (“<u>Brilliant</u>”)</p>	<p>c/o Arthur E. Rosenberg Robert S. Bernstein HOLLAND & KNIGHT LLP 31 West 52nd Street 12th Floor New York, NY 10019 Telephone: 212-513-3200 arthur.rosenberg@hklaw.com rob.bernstein@hklaw.com</p>	<p>Brilliant, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of Coeur Mexicana S.A. de C.V., Coeur Rochester, Inc., and Wharf Resources (U.S.A.), Inc (“<u>Coeur</u>”)</p>	<p>c/o Michael A. Rosenthal, Esq. Keith R. Martorana, Esq. GIBSON, DUNN & CRUTCHER LLP 200 Park Avenue New York, New York 10166-0193 Tel. (212) 351-4000 Fax. (212) 351-4035 MRosenthal@gibsondunn.com KMartorana@gibsondunn.com</p>	<p>Coeur, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of Cyber-Fox Trading, Inc. (“<u>Cyber-Fox</u>”)</p>	<p>c/o Howard P. Magaliff RICH MICHAELSON MAGALIFF, LLP 335 Madison Avenue 9th Floor New York, NY 10017 Telephone: 646-453-7851 hmagaliff@r3mlaw.com</p>	<p>Cyber-Fox, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of Debb Schott, Inc. d/b/a Poplar Jewelry and Pawn (“<u>Debb Schott</u>”)</p>	<p>c/o Robert Fleischer Kellianne Baranowsky GREEN & SKLARZ LLC 700 State Street, Suite 100 New Haven, CT 06511 (203) 285-8545 rfleischer@gs-lawfirm.com kbaranowsky@gs-lawfirm.com</p>	<p>Debb Schott, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of Design Gold Group, Inc. (“<u>DGG</u>”)</p>	<p>c/o Bruce Dopke STAHL COWEN CROWLEY ADDIS, LLC 55 W. Monroe Street, Suite 1200 Chicago, IL 60603 bdopke@stahlcowen.com Tel: 312-641-0060</p>	<p>DGG, one of the Customers, has knowledge regarding its claims against the Debtors</p>

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<p>Corporate representative (or records custodian) of Eddie & Co. of NY, Inc. d/b/a Diamond Kingdom (“<u>Eddie & Co.</u>”)</p>	<p>c/o Steven E. Lewis Luke McGrath DUNNINGTON, BARTHOLOW & MILLER LLP 230 Park Avenue 21st Floor New York, NY 10169 Telephone: 212-682-8811 slewis@dunnington.com lmcgrath@dunnington.com</p>	<p>Eddie & Co., one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of EZPAWN, L.P. (“<u>EZPAWN</u>”)</p>	<p>c/o Gerard DiConza Jeffrey Traurig Lance A. Schildkraut ARCHER & GREINER, P.C. 630 Third Avenue New York, NY 10017 Telephone: 212-682-4940 gdiconza@archerlaw.com jtraurig@archerlaw.com lschildkraut@archerlaw.com</p>	<p>EZPAWN, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of FCP Diamonds, LLC (“<u>FCP</u>”)</p>	<p>c/o Robert Fleischer Kellianne Baranowsky GREEN & SKLARZ LLC 700 State Street, Suite 100 New Haven, CT 06511 (203) 285-8545 rfleischer@gs-lawfirm.com kbaranowsky@gs-lawfirm.com</p>	<p>FCP, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of First Majestic Silver Corp.; Nusantara de Mexico S.A. de C.V.; Primero Empresa Minera, S.A. de C.V. (“<u>First Majestic</u>”)</p>	<p>c/o Janice B. Grubin LECLAIRRYAN 885 Third Avenue, Sixteenth Floor New York, NY 10022 T: 212-697-6555 F: 212-986-3509 Janice.Grubin@leclairryan.com</p>	<p>First Majestic, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of Fundación Rafael Dondé, I.A.P. (“<u>Fundación</u>”)</p>	<p>c/o Richard F. Hans Rachel Ehrlich Albanese DLA PIPER LLC (US) 1251 Avenue of the Americas New York, NY 10020 Telephone: 212-335-4500 Richard.Hans@dlapiper.com Rachel.Albanese@dlapiper.com</p>	<p>Fundación, one of the Customers, has knowledge regarding its claims against the Debtors</p>

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Corporate representative (or records custodian) of Geib Refining Corp. (“ <u>Geib</u> ”)	c/o Howard P. Magaliff RICH MICHAELSON MAGALIFF, LLP 335 Madison Avenue 9th Floor New York, NY 10017 Telephone: 646-453-7851 hmagaliff@r3mlaw.com	Geib, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of General Refining and Smelting Corp. (“ <u>General Refining</u> ”)	c/o Robert Fleischer Kellianne Baranowsky GREEN & SKLARZ LLC 700 State Street, Suite 100 New Haven, CT 06511 (203) 285-8545 rfleischer@gs-lawfirm.com kbaranowsky@gs-lawfirm.com	General Refining, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of GoldSilver, LLC (“ <u>GoldSilver</u> ”)	c/o Howard P. Magaliff RICH MICHAELSON MAGALIFF, LLP 335 Madison Avenue 9th Floor New York, NY 10017 Telephone: 646-453-7851 hmagaliff@r3mlaw.com	GoldSilver, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of INTL FCStone Ltd. (“ <u>INTL FCStone</u> ”)	c/o Jane Pearson POL SINELLI PC 1000 Second Avenue Suite 3500 Seattle, WA 98104 Telephone: 206-393-5415 Jane.pearson@polsinelli.com	INTL FCStone, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of Israel Coins and Medals Corp. Ltd. (“ <u>Israel Coins</u> ”)	c/o Davis Lee Wright ROBINSON & COLE LLP 1000 N. West Street Suite 1200 Wilmington, DE 19801 Telephone: 212-451-2900 dwright@rc.com	Israel Coins, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of James Avery Craftsman, Inc. (“ <u>James Avery</u> ”)	c/o David A. Blansky LAMONICA HERBST & MANISCALCO, LLP 3305 Jerusalem Avenue Wantagh, NY 11793 Telephone: 516-826-6500 dab@lhmlawfirm.com”	James Avery, one of the Customers, has knowledge regarding its claims against the Debtors

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Corporate representative (or records custodian) of Jewellery Quarter Bullion Limited (“ <u>JQBL</u> ”)	Jewellery Quarter Bullion Limited Floor 16 Centre City House 7 Hill Street Birmingham, B5 4UA United Kingdom Telephone: +44(0) 121 634 8060	JQBL, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of Mid-States Recycling, Inc. (“ <u>Mid-States</u> ”)	c/o Robert Fleischer Kellianne Baranowsky GREEN & SKLARZ LLC 700 State Street, Suite 100 New Haven, CT 06511 (203) 285-8545 rfleischer@gs-lawfirm.com kbaranowsky@gs-lawfirm.com	Mid-States, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of Midwest Refineries, LLC (“ <u>Midwest</u> ”)	c/o Gary D. Bressler Nicole Leonard MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP 300 Delaware Avenue Suite 770 Wilmington, DE 19801 Telephone: 212-483-9490 gbressler@mdmc-law.com nleonard@mdmc-law.com	Midwest, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of Minas de Oroco Resources, S.A. de C.V. (“ <u>Minas de Oroco</u> ”)	c/o Howard P. Magaliff RICH MICHAELSON MAGALIFF, LLP 335 Madison Avenue 9th Floor New York, NY 10017 Telephone: 646-453-7851 hmagaliff@r3mlaw.com	Minas de Oroco, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of Mitchell Levine, Erie Management Partners, LLC, and Plat/Co. (“ <u>Mitchell Levine</u> ”)	c/o Steven M. Berman SHUMAKER, LOOP & KENDRICK, LLP 101 E. Kennedy Boulevard Bank of America Plaza, Suite 2800 Tampa, FL 99602 Telephone: 813-229-7600 sberman@slk-law.com and Michael P. Richman STEINHILBER SWANSON LLP 122 W. Washington Suite 850 Madison, WI 53703 Telephone: 608-630-8990 mrichman@Steinhilberswanson.com	Mitchell Levine, one of the Customers, has knowledge regarding its claims against the Debtors

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Corporate representative (or records custodian) of Music City Group, LLC (“ <u>Music City</u> ”)	c/o Howard P. Magaliff RICH MICHAELSON MAGALIFF, LLP 335 Madison Avenue 9th Floor New York, NY 10017 Telephone: 646-453-7851 hmagaliff@r3mlaw.com	Music City, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of My Gold Limited (“ <u>My Gold</u> ”)	c/o Howard P. Magaliff RICH MICHAELSON MAGALIFF, LLP 335 Madison Avenue 9th Floor New York, NY 10017 Telephone: 646-453-7851 hmagaliff@r3mlaw.com	My Gold, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of Noble Metal Services, Inc. (“ <u>Noble</u> ”)	c/o Robert Fleischer Kellianne Baranowsky GREEN & SKLARZ LLC 700 State Street, Suite 100 New Haven, CT 06511 (203) 285-8545 rfleischer@gs-lawfirm.com kbaranowsky@gs-lawfirm.com	Noble, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of North American Bullion Exchange (“ <u>NA Bullion</u> ”)	c/o Howard P. Magaliff RICH MICHAELSON MAGALIFF, LLP 335 Madison Avenue 9th Floor New York, NY 10017 Telephone: 646-453-7851 hmagaliff@r3mlaw.com	NA Bullion, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of Pollock-Cameron Investments Corp. and 7645635 Canada Inc. (“ <u>Pollock-Cameron</u> ”)	c/o Sean C. Southard KLESTADT WINTERS JURELLER SOUTHARD & STEVENS, LLP 200 W. 41st Street 17th Floor New York, NY 10036 Telephone: 212-972-3000 ssouthard@klestadt.com”	Pollock-Cameron, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of PPS, Inc. d/b/a Braswell & Son (“ <u>PPS</u> ”)	c/o Robert Fleischer Kellianne Baranowsky GREEN & SKLARZ LLC 700 State Street, Suite 100 New Haven, CT 06511 (203) 285-8545 rfleischer@gs-lawfirm.com kbaranowsky@gs-lawfirm.com	PPS, one of the Customers, has knowledge regarding its claims against the Debtors

Names	Contact Information	Subjects of Information
<p>Corporate representative (or records custodian) of Premier Gold Mines Limited (“<u>Premier</u>”)</p>	<p>c/o Janet M. Weiss Jessica D. Mikhailevich DORSEY & WHITNEY LLP 51 West 52nd Street New York, NY 10019-6119 Telephone: 212-415-9357 weiss.janet@dorsey.com mikhailevich.jessica@dorsey.com</p>	<p>Premier, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of Pretium Exploration, Inc. (“<u>Pretium</u>”)</p>	<p>c/o Eric Seiler Jamuna D. Kelley Jason C. Rubinstein FRIEDMAN KAPLAN SEILER & ADELMAN LLP 7 Times Square New York, NY 10036-6516 Telephone: 212-833-1100 eseiler@fklaw.com jkelley@fklaw.com jrubinstein@fklaw.com</p>	<p>Pretium, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of Prince & Izant Company (“<u>Prince & Izant</u>”)</p>	<p>c/o David J. Kozlowski Edward P. Gilbert Robert K. Dakis MORRISON COHEN LLP 909 Third Avenue New York, NY 10022-4784 Telephone: 212-735-8600 bankruptcy@morrisoncohen.com</p> <p>and</p> <p>Rocco I. Debitetto HAHN LOESER & PARKS LLP 200 Public Square Suite 2800 Cleveland, OH 44114 Telephone: 216-621-0150 ridebitetto@hahnlaw.com</p>	<p>Prince & Izant, one of the Customers, has knowledge regarding its claims against the Debtors</p>
<p>Corporate representative (or records custodian) of Pyropure, Inc., d/b/a Pyromet (“<u>Pyromet</u>”)</p>	<p>c/o William J. Levant KAPLIN STEWART MELOFF REITER & STEIN, P.C. 1700 Market Street Suite 1005 Philadelphia, PA 19103 Telephone: 610-941-2474 wlevant@kaplaw.com</p>	<p>Pyromet, one of the Customers, has knowledge regarding its claims against the Debtors</p>

Names	Contact Information	Subjects of Information
Corporate representative (or records custodian) of Queen of Pawns & Jewellery, Inc. (" <u>Queen</u> ")	c/o Burton S. Weston GARFUNKEL WILD, P.C. 111 Great Neck Road Great Neck, NY 11021 Telephone: 516-393-2200 bweston@garfunkelwild.com	Queen, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of San Diego Gold Exchange (" <u>SDGE</u> ")	c/o Thomas J. Frank THE LAW OFFICES OF MARK J. FRIEDMAN P.C. 66 Split Rock Road Syosset, NY 11791 Telephone: 516-653-2480 tfrank@friedmanpc.com	SDGE, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of SCMI US Inc. (" <u>SCMI</u> ")	c/o Wanda Borges Sue L. Chin BORGES & ASSOCIATES, LLC 575 Underhill Boulevard Syosset, NY 11791 Telephone: 516-677-8200 wborges@borgeslawllc.com schin@borgeslawllc.com	SCMI, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of SK Bullion Pte Ltd (" <u>SK Bullion</u> ")	c/o Edward E. Neiger Marianna Udem ASK LLP 151 West 46th Street 4th Floor New York, NY 10036 Telephone: 212-267-7342 eneiger@askllp.com mudem@askllp.com	SK Bullion, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of So Accurate Group, Inc., d/b/a So Accurate Refining Services (" <u>So Accurate</u> ")	c/o Carl N. Kunz, III Eric J. Monzo MORRIS JAMES LLP 500 Delaware Avenue Suite 1500 Wilmington, DE 19801 Telephone: 302-888-6800 ckunz@morrisjames.com emonzo@morrisjames.com	So Accurate, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of Strategic Gold Corporation (" <u>Strategic</u> ")	c/o Howard P. Magaliff RICH MICHAELSON MAGALIFF, LLP 335 Madison Avenue 9th Floor New York, NY 10017 Telephone: 646-453-7851 hmagaliff@r3mlaw.com	Strategic regarding its claims against the Debtors

Names	Contact Information	Subjects of Information
Corporate representative (or records custodian) of Texas Precious Metals LLC (“ <u>TPM</u> ”)	c/o Howard P. Magaliff RICH MICHAELSON MAGALIFF, LLP 335 Madison Avenue 9th Floor New York, NY 10017 Telephone: 646-453-7851 hmagaliff@r3mlaw.com	TPM, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of The Gold Refinery, LLC and Norman Bean (“ <u>Gold Refinery</u> ”)	c/o Paul R. Hage JAFFE RAITT HEUER & WEISS, P.C. 27777 Franklin Rd., Suite 2500 Southfield, MI 48034 Telephone: 248-351-3000 phage@jaffelaw.com	Gold Refiner, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of Tiffany & Co. (“ <u>Tiffany</u> ”)	c/o Benjamin Mintz Charles A. Malloy ARNOLD & PORTER KAYE SCHOLER LLP 250 West 55th Street New York, NY 10019-9710 Telephone: 212-836-8000 benjamin.mintz@arnoldporter.com charles.malloy@arnoldporter.com	Tiffany, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of USGB LLC d/b/a United States Gold Bureau and Wholesale Coins Direct, LLC (“ <u>USGB</u> ”)	c/o Daniel F. Blanks NELSON MULLINS RILEY & SCARBOROUGH LLP 50 N. Laura Street 41st Floor Jacksonville, FL 32202 Telephone: 904-665-3656 daniel.blanks@nelsonmullins.com	USGB, one of the Customers, has knowledge regarding its claims against the Debtors
Corporate representative (or records custodian) of Yamana Gold, Inc. (“ <u>Yamana</u> ”)	c/o David L. Elsberg David S. Flugman SELENDY & GAY PLLC 1290 Avenue of the Americas New York, NY 10104 Telephone: 212-390-9000 delsberg@selendygay.com dflugman@selendygay.com	Yamana, one of the Customers, has knowledge regarding its claims against the Debtors

Rule 26(a)(1)(A)(ii). A copy – or a description by category and location–of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment:

Items that are intended solely for impeachment are not covered by the provision of Rule 26(a)(1)(A)(ii) of the Federal Rules of Civil Procedure. Plaintiff reserves the right to supplement his disclosures under Rule 26(e)(1)(A) of the Federal Rules of Civil Procedure.

The following categories of documents are in the Defendants' possession, custody or control and may be relevant to any party's claim or defense: (1) documents and correspondence regarding the Debtors' relationship with the Customer, (2) inventory records, (3) shipping and receiving records, and, 4) refining records. In accordance with Paragraph 13 of the Procedures Order, the Debtors will provide Customers and the Senior Lenders access to a confidential document room for all discovery with private and confidential folders for each Customer, the Debtors and the Senior Lenders.

Rule 26(a)(1)(A)(iii). A computation of any category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered:

The Debtors are not seeking any damages from claimants at this time although they reserve their rights to do so.

Rule 26(a)(1)(A)(iv). For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy part or all of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment:

The Debtors' officers and directors are covered by the following types of insurance policies: Director and Officer Liability, Crime & Flood, General Liability and Commercial Property, Worker's Compensation, Pollution, and Automobile.

Dated: March 11, 2019

Respectfully Submitted,

AKERMAN LLP

By: /s/ John E. Mitchell

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