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Minas de Oro Nacional, S.A. de C.V., and
Minera Santa Rita S. de R.L. de C.V.*

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

In re: : Chapter 11
: Case No. 18-13359 (SHL)
REPUBLIC METALS REFINING : (Jointly Administered)
CORPORATION, *et al.*, :
Debtors.¹ :

**INITIAL DISCLOSURES 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. PURSUANT TO FRCP 26(A)(1)**

Alamos Gold Inc. and its subsidiaries, Minas de Oro Nacional, S.A. de C.V.

(“MON”) and Minera Santa Rita S. de R.L. de C.V. (“MSR”) (collectively, “Alamos”), as

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).

creditors in the above-captioned chapter 11 cases (collectively, the “Chapter 11 Cases”), pursuant to Rule 7026(a) of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), the Order Approving Uniform Procedures for Resolution of Ownership Disputes (ECF No. 395) (the “Procedures Order”) and the Notice of Amended Deadlines (ECF No. 677), hereby submit the following initial discovery disclosures:

PRELIMINARY STATEMENT

The following disclosures are made based upon the information reasonably available to Alamos today, and are subject to supplementation as additional information becomes available. By making these disclosures, Alamos does not represent that they are identifying every document, tangible thing, or witness possibly relevant to this lawsuit. Rather, these disclosures represent a good faith effort to identify information they reasonably believe is required to be disclosed pursuant to Bankruptcy Rule 7026 and the Procedures Order. Alamos will provide supplemental disclosures as additional information becomes available.

In addition, these disclosures are subject to and are made without in any way waiving the right: (1) to object on the grounds of competency, privilege, relevancy and materiality, hearsay, or any other proper ground, to the use of any such information, for any purpose, in whole or in part, in any proceeding in this action or any other action; and (2) to object on any and all grounds, at any time, to any other discovery request or proceeding involving or relating to the subject matter of these disclosures. These qualifications are incorporated by reference in sections A-D below.

A. POTENTIAL WITNESSES

The following list identifies those persons who may have discoverable information regarding the subject matter of this litigation and/or Alamos may use to support their claims and/or defenses, based on their current information or belief and subject to the qualifications set forth above. Alamos also may, based upon information subsequently obtained in discovery or otherwise, rely upon additional witnesses that are not identified below. Alamos may also rely on witnesses identified by plaintiffs.

Name	Affiliation	Subject(s)	Address/Tel. No.
Grace Tang	Alamos Gold Inc.	<ul style="list-style-type: none"><li data-bbox="760 856 1052 930">• Negotiation of Toll Agreement<li data-bbox="760 972 1052 1115">• Transfer, assay and processing of Doré Shipment 301 (the "<u>Doré Shipment</u>").	c/o Torys LLP 1114 Avenue of the Americas, 23rd Floor New York, NY 10036 (212) 880-6000

B. DOCUMENTS

The documents that Alamos have in their possession, custody or control and may use to support their claims and/or defenses include: (1) communications with Republic Metals Corporation relating to the Doré Shipment; (2) documents concerning the Doré Shipment; and (3) documents concerning the contents and value of the Doré Shipment. These documents are located within Alamos's records. Alamos may, based upon subsequently developed information, rely upon additional document categories that have not been identified herein, including documents produced by parties and non-parties in discovery. Certain of these documents may be confidential, and may only be produced upon entry of a suitable confidentiality order.

C. DAMAGES

Alamos has computed damages of \$87,078.33 with respect to the Doré Shipment as set forth in the Customer Statement (ECF No. 433), however that amount may fluctuate based upon gold and silver market prices.

D. INSURANCE

Alamos is not currently aware of any insurance available to cover a possible judgment in connection with this action.

Dated: March 11, 2019
New York, New York

Respectfully submitted,

/s/ Alison D. Bauer

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