

**Exhibit A**

**Proposed Order**

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

In re:

REPUBLIC METALS REFINING  
CORPORATION, et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 18-13359 (SHL)

(Jointly Administered)

**ORDER GRANTING THE *EX PARTE* MOTION OF YAMANA GOLD INC.  
FOR ENTRY OF AN ORDER TO (I) FILE A DOCUMENT UNDER SEAL  
AND (II) REDACT COMMERCIALY SENSITIVE, NONPUBLIC  
INFORMATION**

Upon the *ex parte* motion (the “Motion”)<sup>2</sup> of Yamana Gold Inc. (“Yamana”) for the entry of an order (the “Order”) (a) authorizing Yamana to file the Redacted Document under seal; (b) redacting commercially sensitive, nonpublic information in the Redacted Document, and (c) directing that the Redacted Document shall remain under seal and not be made available to anyone, except as specifically provided in the Order, without the consent of Yamana or further order of the Court; and the Court having reviewed the Motion; and the Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, their

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<sup>1</sup> 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).

<sup>2</sup> Capitalized terms used and not otherwise defined herein shall have the meanings set forth in the Motion.

creditors, Yamana, and other parties in interest; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation thereon; and good and sufficient cause appearing therefore, it is **HEREBY ORDERED THAT:**

1. The Motion is granted as set forth herein.
2. Yamana shall provide copies of the Redacted Document to the Court for *in camera* review, and to the following parties or their counsel on a confidential basis: (a) the U.S. Trustee, (b) the Debtors, and (c) the Secured Lenders.
3. All information filed under seal pursuant to this Order shall remain under seal until further order of the Court.
4. This Order is without prejudice to the rights of any party in interest or the U.S. Trustee to seek to make public any portion of the Redacted Document filed under seal.
5. Yamana shall submit an unredacted copy of the Redacted Document with the Clerk of this Court under seal in an envelope, clearly indicating that the same has been filed under seal by order of the United States Bankruptcy Court for the Southern District of New York and may not be unsealed until and unless permitted by further order of the Court.
6. The Clerk of Court shall treat the Redacted Document as confidential and counsel for Yamana shall contact the Clerk's Office regarding the return or disposition of the Redacted Document as soon as practicable following the effective date of any plan of reorganization or liquidating in these cases or any successor cases.
7. Yamana is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.
8. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

9. This Court retains exclusive jurisdiction to hear and determine all matters arising from or related to the implementation or interpretation of this Order.

New York, New York

Date: \_\_\_\_\_, 2019

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Hon. Sean H. Lane

United States Bankruptcy Judge