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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 MARCH 21, 2019 AT 11:00 A.M.**

Time and Date of Hearing: March 21, 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 **March 21, 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

1. Case status update
 - i. Discovery status and update
2. Initial Status Conference regarding Uniform Procedures for Resolution of Ownership Disputes [ECF No. 395].

B. UNCONTESTED MATTERS

1. **Motion to Approve Compromise with Wharf Resources (U.S.A.) Pursuant to Federal Rule of Bankruptcy Procedure 9019 [ECF No. 632].**
 - a. Response Deadline: March 14, 2019 at 4:00 p.m. (Eastern)
 - b. Responses Received: None
 - c. Related Documents:
 - i. Ex Parte Motion to Shorten Time of Notice Period [ECF No. 633].
 - ii. Order Denying Ex Parte Motion to Shorten Time of Notice Period [ECF No. 644].
 - iii. Amended Notice of Hearing [ECF No. 653].
 - d. Status: Going forward on final basis.
2. **Debtors' Motion to Reject Vehicle Lease Agreement Effective *Nunc Pro Tunc* to Surrender Date Pursuant to 11 U.S.C. §§ 105(a) and 365(a) and Fed. R. Bankr.P. 9019 [ECF No. 657].**
 - a. Response Deadline: March 14, 2019 at 4:00 p.m.
 - b. Responses Received: None
 - c. Related Documents: None

- d. **Status**: Going forward on a final basis.
- 3. Motion to Sell Property of the Estate Free and Clear of All Liens, Claims, Encumbrances, and Interests (Remaining Assets) [ECF No. 691]**
- a. **Response Deadline**: March 14, 2019 at 4:00 p.m.
 - b. **Responses Received**: None
 - c. **Related Documents**:
 - i. Supplement to Motion to Sell Property of the Estate Free and Clear of All Liens, Claims, Encumbrances, and Interests (Remaining Assets) [ECF No. 801].
 - ii. Declaration of Scott Avila, as Chief Restructuring Officer, in Support of Motion to Sell Property of the Estate Free and Clear of All Liens, Claims, Encumbrances, and Interests (Remaining Assets) [ECF No. 802].
 - d. **Status**: Going forward on a final basis.
- 4. Ex Parte Motion to Seal Argonaut Gold Inc.'s Customer Statement [ECF No. 480].**
- a. **Response Deadline**: March 18, 2019 at 4:00 p.m.
 - b. **Responses Received**: None
 - c. **Related Documents**:
 - i. Customer Statement of Argonaut Gold, Inc. [ECF No. 471].
 - d. **Status**: Going forward.
- 5. Ex Parte Motion to Seal Yamana Gold, Inc.'s Customer Statement [ECF No. 490].**
- a. **Response Deadline**: March 14, 2019 at 4:00 p.m.
 - b. **Responses Received**: None.
 - c. **Related Documents**:
 - i. Customer Statement of Yamana Gold, Inc. [ECF No. 485].

- d. **Status:** Going forward.
6. ***Ex Parte* Motion to Seal Yamana Gold, Inc.'s Amended Customer Statement [ECF No. 785].**
- a. **Response Deadline:** March 14, 2019 at 4:00 p.m.
 - b. **Responses Received:** None.
 - c. **Related Documents:**
 - i. Amended Customer Statement of Yamana Gold, Inc. [ECF No. 782].
 - d. **Status:** Going forward.

C. **CONTESTED MATTERS**

1. **Motion to Authorize Debtors to Make Post-Petition Retention Payments to Certain Non-Insider Employees Pursuant to Sections 105(a), 363(b), and 503(c) [ECF No. 574].**
- a. **Response Deadline:** March 14, 2019 at 4:00 p.m.
 - b. **Responses Filed:** None.
 - c. **Related Documents:**
 - i. Supplement to Motion [ECF No. 794].
 - ii. Declaration of Scott Avila in Support of Motion [ECF No. 795].
 - iii. Amended Supplement to Motion [ECF No. 803].
 - iv. Amended Declaration of Scott Avila in Support of Motion [ECF No. 804].
 - d. **Status:** Going forward on a final basis.
2. **Status Conference and Preliminary Hearing on Omnibus Objection to All Reclamation Claims [ECF No. 640].**
- a. **Response Deadline:** March 20, 2019 at 4:00 p.m.
 - b. **Responses Filed:**
 - i. Response filed by Midwest Refineries [ECF No. 736].

- ii. Response filed by Tiffany and Company [ECF No. 805].
 - c. Related Documents: None.
 - d. Status:
 - i. Going forward as to Objection to Reclamation Demands for which a Response was not timely filed or related to any Reclamation Demand that was not timely served upon the Debtors, including:
 - 1. Parties listed on Exhibit A to Omnibus Objection at Nos. 10 (Bullion Exchange, LLC), 22 (Gold Resource Corporation), 24 (Kahan Jewelry Company), 43 (Ross Metals Corp.), and 44 (So Accurate Group, Inc.).
 - ii. Status/Scheduling Conference as to Omnibus Objection and Responses based upon (i) the contention that the Debtors could not identify and segregate goods in response to the relevant Reclamation Demand and (ii) the asserted seniority of the Senior Lenders' liens, including:
 - 1. Parties listed on Exhibit A to Omnibus Objection at Nos. 1-21, 23, 25-42, and 45-48.
- 3. Amended Third Omnibus Motion to Approve Settlements with Customers Pursuant to Federal Rule of Bankruptcy Procedure 9019 [ECF No. 692].**
- a. Response Deadline: March 14, 2019 at 4:00 p.m. (Eastern)
 - b. Responses Received: None.
 - c. Related Documents:
 - i. Omnibus Motion to Approve Settlement Agreements with Customers Pursuant to Federal Rule of Bankruptcy Procedure 9019 [ECF No. 647].
 - ii. Objection to Amended Motion filed by Erie Management Partners, LLC and Mitchell Levine [ECF No. 800].
 - d. Status: going forward.
- 4. 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 Filed:

- 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**].
 - xxiv. Objection of Jason Rubin, Rose Rubin, Lindsey Rubin, the Second Amended and Restated Rose Rubin Revocable Trust U/D/A 9/25/2013, the Amended and Restated Richard Rubin Revocable Trust U/D/A 12/8/2008, Republic Metals Warehouse LLC, Richard Rubin Linday Investments, LLC, Jason Ross Rubin Enterprises LLC, and RRLJ12 LLC 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. 199**].
 - xxv. Limited Objection, Joinder and Reservation of Rights with Respect to Debtors' Motion for Entry of Interim and Final Orders (1) Authorizing the Debtors' Use of Cash Collateral [by Prince & Inzant Company] [**ECF No. 202**].
 - xxvi. Omnibus Reply of the Senior Lenders to Objections to the Debtors' Cash Collateral Motion [**ECF No. 208**].
- 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 Proposed Order Continuing Final Hearing on Cash Collateral [ECF No. 209].
- ix. Notice of Proposed Interim Cash Collateral Budget [ECF No. 212].
- x. Notice of Proposed Second Interim Cash Collateral Order and Budget [ECF No. 255].
- xi. Notice of Proposed Alternative Second Interim Cash Collateral Order [ECF No. 260].
- xii. Second Interim Order on Cash Collateral [ECF No. 277].
- xiii. Notice of Proposed Third Interim Cash Collateral Order [ECF No. 318].
- xiv. Notice of Proposed Third Interim Cash Collateral Budget [ECF No. 323].
- xv. Third Interim Order on Cash Collateral [ECF No. 373].
- xvi. Notice of Proposed Fourth Interim Cash Collateral Order and Budget [ECF No. 515].
- xvii. Fourth Interim Order on Cash Collateral [ECF No. 538].
- xviii. Notice of Filing Proposed Fifth Interim Order on Cash Collateral [ECF No. 650].

xix. Notice of Filing Proposed Fifth Interim Cash Collateral Budget [ECF No. 651].

xx. Fifth Interim Order on Cash Collateral [ECF No. 675].

d. **Status:** Going forward on an interim basis.

Dated: March 19, 2019

AKERMAN LLP

By: /s/Katherine C. Fackler

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