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

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In re:	:	Chapter 11 Case No.:
	:	
REPUBLIC METALS REFINING	:	18-13359 (SHL)
CORPORATION, et al., ¹	:	
	:	(Jointly Administered)
Debtors.	:	
	:	
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**RESPONSE OF COEUR MEXICANA S.A. DE C.V., COEUR
ROCHESTER, INC., AND WHARF RESOURCES (U.S.A.), INC. TO
DEBTORS' OMNIBUS OBJECTION TO ALL RECLAMATION CLAIMS**

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).

Coeur Mexicana S.A. de C.V. (“**Coeur Mexicana**”), Coeur Rochester, Inc. (“**Coeur Rochester**”), and Wharf Resources (U.S.A.), Inc. (“**Wharf**”)² (collectively, “**Coeur**”), hereby submit this response (the “**Response**”) to the Debtors’ *Omnibus Response to All Reclamation Claims* [Dkt. 640] (the “**Objection**”) pursuant to the *Corrected Amended Order Approving Omnibus Objections Procedures for Resolution of Reclamation Demands and Setting Preliminary Hearing* [Dkt. No. 626] (the “**Order**”).

Pursuant to the Order, Coeur hereby designates as its response to the Objection the *Statement of Claimed Ownership and Claims of Coeur Mexicana S.A. de C.V., Coeur Rochester, Inc., and Wharf Resources (U.S.A.), Inc.* [Dkt. No. 470] and the *Supplemental Customer Statement of Coeur Mexicana S.A. de C.V., Coeur Rochester Inc., and Wharf Resources (U.S.A.), Inc.* [Dkt. No. 763] (collectively, the “**Customer Statement**”), and incorporates the Customer Statement by reference as if fully set forth herein.³

² On February 15, 2019, the Debtors filed a motion seeking authority to approve a settlement with Wharf [Dkt. No. 632] (the “**Wharf Settlement**”), which motion is scheduled to be heard on March 21, 2019 [Dkt. No. 653]. Wharf’s inclusion in this Response is intended to be applicable solely in the event that the Court does not approve the Wharf Settlement.

³ Coeur further reserves its rights regarding the relative priority of the Senior Lenders’ asserted liens and Coeur’s lien rights in connection with its reclamation claims asserted in the Customer Statement, pending the outcome of certain contingencies, including without limitation the investigation by the Official Committee of Unsecured Creditors, expiration of the Challenge Period (as defined in the *Interim Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 503 And 507 (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* [Dkt. No. 54]), and litigation of any challenges to the Senior Lenders’ liens.

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