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Attorneys for Cyber-Fox Trading, Inc.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	Case No. 18-13359 (SHL)
REPUBLIC METALS REFINING	:	
CORPORATION, <i>et al.</i> , ¹	:	(Jointly Administered)
	:	
Debtors.	:	
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**CYBER-FOX TRADING, INC.’S RESPONSE TO DEBTORS’
OMNIBUS OBJECTION TO ALL RECLAMATION CLAIMS**

Cyber-Fox Trading, Inc. (“Cyber-Fox”), by its attorneys Rich Michaelson

Magaliff, LLP, respectfully submits this response to the *Debtors’ Omnibus Objection to All Reclamation Claims* dated February 18, 2019 [doc. 640] (the “Objection”) and states:

1. As permitted by the *Corrected Amended Order Approving Omnibus Objections Procedures For Resolution Of Reclamation Demands And Setting Preliminary Hearing* entered by the Court on February 15, 2019 [doc. 626], Cyber-Fox hereby designates its *Customer*

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).

Statement Concerning Ownership of Pool Account Metal [doc. 441] as its response to the Objection.

Dated: New York, New York
March 20, 2019

RICH MICHAELSON MAGALIFF, LLP
Attorneys for Cyber-Fox Trading, Inc.
By:

/s/ Howard P. Magaliff
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