

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

| | | |
|----------------------------|---|-------------------------|
| In re: |) | Chapter 11 |
| REPUBLIC METALS REFINING |) | |
| CORPORATION, <i>et als</i> |) | Case No. 18-13359 (SHL) |
| |) | |
| Debtors |) | (Jointly Administered) |

**SUPPLEMENT TO DESIGNATION of OBJECTION
of PYROPURE, Inc., d/b/a PYROMET
as “CUSTOMER STATEMENT” PURSUANT TO ORDER APPROVING
UNIFORM PROCEDURES for RESOLUTION of OWNERSHIP DISPUTES (D.I. #395)**

Pyropure, Inc., d/b/a Pyromet (the “**Claimant**”), by its undersigned counsel, supplements its “Customer Statement” (D.I. #411, 164) filed pursuant to the Court’s Order approving Uniform Procedures for Resolution of Ownership Disputes, entered January 11, 2019, as D.I. 395., as follows:

1. Pyromet incorporates by reference the entire contents of D.I. #411 and 164 as if fully set forth again.
2. In addition thereto, and in the alternative, Pyromet claims administrative priority for the value of the goods described in Paragraph 10(a) of the Klein affidavit attached to D.I. #164, according to 11 U.S.C. §503(b)(1), or, alternatively, 11 U.S.C. §503(b)(9), as set forth in its Application for Administrative Expense, filed April 10, 2019, as D.I. #899.
3. These goods therein described were delivered to the Debtors within twenty days before the Chapter 11 Petitions were filed, were used for the benefit of the Debtors post-petition, or both.

The Claimant reserves all rights with respect to this supplemental designation, including

the right to further supplement, amend, correct or withdraw it, in whole or in part.

KAPLIN STEWART MELOFF REITER & STEIN, P.C.

By: /s/ William J. Levant, Esquire (Admitted Pro Hac Vice)
William J. Levant, Esquire (PA Attorney ID 54286)
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wlevant@kaplaw.com
Attorney for Claimant

Date: April 10, 2019

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CERTIFICATE of SERVICE

I, William J. Levant, Esquire, do hereby certify that on January 15, 2019, I caused copies of the foregoing designation to be sent to each of the following persons, by email as ordered:

joanne.gelfand@akerman.com

luis.casas@akerman.com

stern@lsellp.com

talesnick@lsellp.com

rwinning@cooley.com

KAPLIN STEWART MELOFF REITER & STEIN, P.C.

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