

PRESENTMENT DATE AND TIME: April 29, 2019 at 12:00 p.m. (Eastern Time)
OBJECTION DEADLINE DATE AND TIME: April 26, 2019 at 4:00 p.m. (Eastern Time)

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Counsel to the Debtors and Debtors in Possession

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

In re:)	Chapter 11
)	
MIAMI METALS I, INC., <i>et al.</i> , ¹)	Case No. 18-13359 (SHL)
)	
Debtors.)	(Jointly Administered)
)	
)	RELATED DOC NOS. 941 and 942

**NOTICE OF PRESENTMENT OF
(I) BRIDGE ORDER FURTHER EXTENDING
THE TIME WITHIN WHICH THE DEBTORS MUST ASSUME OR REJECT
UNEXPIRED LEASES OF NONRESIDENTIAL REAL PROPERTY; AND
(II) BRIDGE ORDER ON DEBTORS' MOTION FOR ENTRY OF AN ORDER
FURTHER EXTENDING DEBTORS' EXCLUSIVE PERIODS
TO FILE A CHAPTER 11 PLAN AND SOLICITY ACCEPTANCES THEREOF**

PLEASE TAKE NOTICE that Miami Metals I, Inc., *et al.*, the above-captioned debtors and debtors in possession (collectively, the “Debtors”), by and through their undersigned

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Miami Metals I, Inc. (f/k/a Republic Metals Refining Corporation), 15 West 47th Street, Suites 206 and 209, New York, NY 10036 (3194); Miami Metals II, Inc. (f/k/a Republic Metals Corporation), 12900 NW 38th Avenue, Miami, FL 33054 (4378); Miami Metals III LLC (f/k/a Republic Carbon Company, LLC), 5295 Northwest 163rd Street, Miami Gardens, FL 33014 (5833); Miami Metals IV LLC (f/k/a J & L Republic LLC), 12900 NW 38th Avenue, Miami, FL 33054 (7604); Miami Metals V LLC (f/k/a R & R Metals, LLC), 12900 NW 38th Avenue, Miami, FL 33054 (7848); Miami Metals VI (f/k/a RMC Diamonds, LLC), 12900 NW 38th Avenue, Miami, FL 33054 (1507); Miami Metals VII (f/k/a RMC2, LLC), 12900 NW 38th Avenue, Miami, FL 33054 (4696); Miami Metals VIII (f/k/a Republic High Tech Metals, LLC), 13001 NW 38 Avenue, Miami, FL 33054 (6102); 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 Joyer Edificio Central, Delegación Cuauhtémoc, Mexico DF 6000 (2942).

counsel, will present the attached proposed (i) *Bridge Order Further Extending the Time Within Which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property* annexed hereto as **Exhibit A**; and (ii) *Bridge Order on Debtors' Motion for Entry of an Order Further Extending Debtors' Exclusive Periods to File Chapter 11 Plan and Solicit Acceptances Thereof* as annexed hereto as **Exhibit B** (collectively the "**Proposed Bridge Orders**"), to the Honorable Sean H. Lane, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, on **April 29, 2019 at 12:00 p.m. (prevailing Eastern Time)** for approval and signature.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to entry of the Proposed Bridge Orders must: (i) be made in writing, (ii) state with particularity the grounds therefor, (iii) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with proof of service, with a courtesy copy delivered to the Chambers of the Honorable Sean H. Lane, One Bowling Green New York, New York 10004; and (iv) be served upon (a) counsel for the Debtors, Akerman LLP, 2001 Ross Avenue, Suite 3600, Dallas, TX 75201 (Attn: John Mitchell, Esq.) and 98 Southeast Seventh Street, Suite 1100, Miami, FL 33131 (Attn: Andrea S. Hartley, Esq. and Katherine C. Fackler, Esq.); (c) counsel for the Creditors' Committee, Cooley LLP, 1114 Avenue of the Americas, New York, New York 10016 (Attn: Seth Van Aalten, Esq. and Ian Shapiro, Esq.); (d) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Shannon Scott, Esq.); and (e) all entities requested notice in these chapter 11 cases under Fed. R. Bankr. P. 2002 so as to be received no later than **4:00 p.m. (prevailing Eastern Time) on April 26, 2019 (the "Objection Deadline")**.

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and received by the Objection Deadline, the Court may enter the Proposed Bridge Orders without further notice or a hearing. If an objection is filed, you may be notified of a hearing to consider the requested relief. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: April 22, 2019

AKERMAN LLP

By: /s/Katherine C. Fackler
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Counsel for Debtors and Debtors-in-Possession

EXHIBIT A

PROPOSED BRIDGE ORDER

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

In re:)	Chapter 11
)	
MIAMI METALS I, INC., <i>et al.</i> , ¹)	Case No. 18-13359 (SHL)
)	
Debtors.)	(Jointly Administered)
)	

**BRIDGE ORDER ON DEBTORS' SECOND MOTION FOR ENTRY OF AN
ORDER FURTHER EXTENDING THE TIME WITHIN WHICH THE DEBTORS'
MUST ASSUME OR REJECT UNEXPIRED LEASES OF
NONRESIDENTIAL REAL PROPERTY**

Upon the motion (the "Motion")² [ECF. No. 942], of Miami Metals I, Inc., *et al.*, the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"), for entry of an order further extending the Debtors' time to assume or reject unexpired leases of nonresidential real property to May 31, 2019 or June 29, 2019, as applicable (the "Lease Rejection Deadline"), without prejudice to the Debtors' right to seek further extensions to the Unexpired Leases, all as more fully described in the Motion; the Motion having been filed prior to the expiration of the Lease Rejection Deadline; and the Motion having been submitted on presentment for April 29, 2019 at 12:00 p.m. (prevailing Eastern Time), with any objections to the Motion to be filed and served by April 26, 2019 at 4:00 p.m. (prevailing Eastern Time); and it appearing that this bridge order is necessary to

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² Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

prevent the Lease Rejection Deadline from lapsing; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The deadline for the Debtors' to assume or reject the Unexpired Leases listed on Exhibit B to the Motion is hereby extended through and including May 15, 2019, *provided however*, that in the event a hearing on the Motion is adjourned, the Lease Rejection Deadline shall be automatically extended through any such adjourned dates, unless the Court orders otherwise.

2. This Order is without prejudice to the relief requested in the Motion, any objections to the relief requested in the Motion, or requests that may be made by the Debtors or any other party in interest pursuant to section 365(d)(4) of the Bankruptcy Code.

3. Nothing in the Motion or this Order shall be deemed or construed as (i) an assumption or rejection of any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code, or (ii) an admission with respect to whether any of the Debtors' contracts or leases is an unexpired lease of nonresidential real property within the meaning of section 365(d) of the Bankruptcy Code. The relief granted by this Order shall not affect the Debtors' rights to assume, assume and assign, or reject any Unexpired Leases.

4. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

5. The Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York
April __, 2019

PROPOSED

HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT B

PROPOSED BRIDGE ORDER

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

In re:)	Chapter 11
)	
MIAMI METALS I, INC., <i>et al.</i> , ¹)	Case No. 18-13359 (SHL)
)	
Debtors.)	(Jointly Administered)
)	

**BRIDGE ORDER ON DEBTORS' MOTION FOR ENTRY OF AN ORDER
FURTHER EXTENDING DEBTORS' EXCLUSIVE PERIODS
TO FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF**

Upon the motion (the "Motion")² [ECF. No. 941], of Miami Metals I, Inc., *et al.*, the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"), for entry of an order further extending the Debtors' Filing Exclusivity Period to June 30, 2019 and the Debtors' Soliciting Exclusivity Period (together with the Filing Exclusivity Period, the "Exclusive Periods") to August 29, 2019, without prejudice to the Debtors' right to seek further extensions to the Exclusive Periods, all as more fully described in the Motion; the Motion having been filed prior to the expiration of the Exclusive Periods; and the hearing on the Motion having been scheduled for May 15, 2019 at 2:00 p.m. (prevailing Eastern Time), with any objections to the Motion to be filed and served by May 8, 2019 at 4:00 p.m. (prevailing Eastern Time); and it appearing that this bridge

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² Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

order is necessary to prevent the Exclusive Periods from lapsing; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Debtors' Filing Exclusivity Period pursuant to section 1121(b) of the Bankruptcy Code, is hereby extended through and including May 20, 2019, *provided however*, that in the event the hearing on the Motion is adjourned, the Filing Exclusivity Period shall be automatically extended through any such adjourned dates, unless the Court orders otherwise.

2. This Order is without prejudice to the relief requested in the Motion, any objections to the relief requested in the Motion, or requests that may be made by the Debtors or any other party in interest pursuant to section 1121(d) of the Bankruptcy Code.

3. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

4. The Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York
April __, 2019

PROPOSED

HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE