

Jane Pearson, *Pro Hac Vice*
POL SINELLI PC
1000 Second Avenue
Suite 3500
Seattle, Washington 98104
(206) 393-5415
Attorneys for INTL FCStone Ltd

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

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

**INTL FCSTONE LTD’S LIMITED OBJECTION TO DEBTOR’S SECOND NOTICE OF
PROPOSED SALE OF PROPERTY OF THE ESTATE (Remaining Assets)**

INTL FCStone Ltd (“FCStone”), for its Limited Objection to Debtor’s Second Notice of Proposed Sale of Property of the Estate (Remaining Assets) [Dkt. # 924] (“Sale Notice”), states as follows:

1. Through the Sale Notice, the Debtors propose to sell, among other things, 77,617.32 oz. of pure silver (“Silver”) and 142.865 oz. of pure gold (“Gold”).
2. As set forth in FCStone’s Amended Statement of Claimed Ownership [Dkt. # 754], it claims an ownership interest in 106.71 ounces of gold and 765.941 ounces of silver delivered to Republic Metals Corporation (nka Miami Metals II, Inc.) (“RMC”) on October 4, 2018. RMC designated these as Lots L181434 and L181435.

¹The Debtors in these chapter 11 cases include Miami Metals I, Inc. (f/k/a Republic Metals Refining Corporation), Miami Metals II, Inc. (f/k/a Republic Metals Corporation), Miami Metals III LLC (f/k/a Republic Carbon Company, LLC), Miami Metals IV LLC (f/k/a J & L Republic LLC), Miami Metals V LLC (f/k/a R & R Metals, LLC), Miami Metals VI (f/k/a RMC Diamonds, LLC), Miami Metals VII (f/k/a RMC2, LLC), Miami Metals VIII (f/k/a Republic High Tech Metals, LLC), Republic Metals Trading (Shanghai) Co., Ltd., and Republic Trans Mexico Metals, S.R.L.

3. It is not possible to determine whether the Silver and Gold described in the Sale Notice includes the silver and gold FCStone delivered to RMC on October 4, 2018.

4. FCStone's claims regarding the silver and gold it delivered to RMC are being determined in accordance with the First Amended Order Approving Uniform Procedures for Resolution of Ownership Disputes [Dkt. # 913].

5. FCStone does not object to the sale proposed by the Notice, but requests that the Court enter an order preserving FCStone's ownership claim by requiring the Debtors to deposit the proceeds allocable to FCStone on a pro rata basis from the sale of the Silver and Gold in a segregated account from which no distribution will be made except by Court order after FCStone's ownership claim is determined.

Dated: April 24, 2019
Seattle, WA

Respectfully submitted,

By: /s/ Jane Pearson
Jane Pearson, *Pro Hac Vice*
POL SINELLI PC
1000 Second Avenue
Suite 3500
Seattle, Washington 98104
(206) 393-5415
jane.pearson@polsinelli.com

Attorneys for INTL FCStone Ltd

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served by CM/ECF, on the 24th day of April, 2019. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

In addition, copies of this limited objection were served by first class mail, postage prepaid, upon Debtors' counsel at the following addresses, on April 24, 2019:

/s/ Jane Pearson

Jane Pearson

John E. Mitchell
Akerman LLP
2001 Ross Avenue, Ste. 3600
Dallas, TX 75201

Yelena Archiyan
Akerman LLP
2001 Ross Avenue, Ste. 3600
Dallas, TX 75201

Andrea S. Hartley
Akerman LLP
98 Southeast Seventh Street, Ste. 1100
Miami, FL 33131

Joanne Geland
Akerman LLP
98 Southeast Seventh Street, Ste. 1100
Miami, FL 33131

Katherine C. Fackler
Akerman LLP
98 Southeast Seventh Street, Ste. 1100
Miami, FL 33131