

John E. Mitchell (Admitted *Pro Hac Vice*)
Yelena Archiyan (Admitted in New York)
AKERMAN LLP
2001 Ross Avenue, Ste. 3600
Dallas, TX 75201
Tel.: (214) 720-4300
Fax: (214) 981-9339

Andrea S. Hartley (Admitted *Pro Hac Vice*)
Joanne Geland (Admitted in New York)
Katherine C. Fackler (Admitted *Pro Hac Vice*)
AKERMAN LLP
98 Southeast Seventh Street, Ste. 1100
Miami, FL 33131
Tel.: (305) 374-5600
Fax: (305) 374-5095

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. NO. 869

**DEBTORS' NOTICE OF
PROPOSED SALE OF PROPERTY OF THE ESTATE
(Remaining Assets)**

Miami Metals I, Inc., *et al.*, as debtors and debtors in possession (collectively, the "Debtors"), by and through undersigned counsel and pursuant to this Court's *Order Granting Debtors' Motion to Sell Remaining Assets of the Estate Free and Clear of All Liens, Claims, Rights, Title, Interests and Encumbrances Pursuant to 11 U.S.C. § 363 (Remaining Assets)* (the "Sale Order") [ECF No. 869]², hereby give notice of their interest to sell certain Remaining Assets, as set forth below:

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), 12900 NW 38th Avenue, Miami, FL 33054 (1507); 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).

² Defined terms from the Sale Order are incorporated by reference herein.

1. The Debtors are seeking to sell certain decommissioned and non-functioning equipment, including old ductwork, tanks, excess rolls of flooring, glass panels, incinerator and mill equipment parts, scrubber parts, broken molds, old smelter manual pour units, and inoperable pumps (the "Decommissioned Equipment").

2. The Debtors previously offered to sell the Decommissioned Equipment to Asahi Holdings, Inc. ("Asahi") in connection with the larger asset sale to Asahi approved at ECF No. 658, however Asahi declined to purchase the Decommissioned Equipment.

3. Subsequently, representatives of Paladin Management Group, the Debtors' financial advisor, contacted multiple parties in an attempt to generate competitive interest in the Decommissioned Equipment, however, they were unsuccessful.

4. The bankruptcy estate has incurred and continues to incur costs storage and personnel costs related to the Decommissioned Equipment.

5. Pyropure, Inc. ("Pyropure") has agreed to purchase the Decommissioned Equipment in exchange for \$25,500 (the "Sale Price").

6. The Debtors believe the Sale Price is reasonable and will benefit the bankruptcy estate, and will eliminate any go-forward costs of the bankruptcy estate related to the Decommissioned Equipment.

7. Accordingly, the Debtors hereby give notice that they intend to sell the Decommissioned Equipment to Pyropure in exchange for the Sale Price.

The Decommissioned Equipment the Debtors seek to sell pursuant to this Notice does not include any customer inventory that is the subject of the Uniform Procedures Order, as amended.

Pursuant to the Sale Order, interested parties shall have five (5) business days from the date of this Notice to file an Objection hereto. Any Objection must (a) be in writing, (b) set

forth the precise nature of the Objection, and (c) be filed with the Court and served via U.S. Mail upon the Debtors, on or before the Objection Deadline. If an Objection is filed, the Debtors will request the Court schedule a hearing on the Objection.

If no timely Objection is filed and served with respect to this Notice, then without further order of the Court, the Debtors shall be authorized to sell the Decommissioned Equipment on the terms proposed above.

Dated: May 31, 2019

AKERMAN LLP

By: /s/Katherine C. Fackler

Katherine C. Fackler
(Admitted *Pro Hac Vice*)
Andrea S. Hartley
(Admitted *Pro Hac Vice*)

Joanne Gelfand
(Admitted in New York)
98 Southeast Seventh Street, Suite 1100
Miami, FL 3313
Tel.: (305) 374-5600
Fax: (305) 374-5095
E-Mail: andrea.hartley@akerman.com
E-Mail: joanne.gelfand@akerman.com
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2001 Ross Avenue, Suite 3600
Dallas, TX 75201
Tel.: (214) 720-4300
Fax: (214) 981-9339
E-Mail: john.mitchell@akerman.com
E-Mail: yelena.archiyan@akerman.com

Counsel for Debtors and Debtors-in-Possession