

**COOLEY LLP**

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Seth Van Aalten  
Robert Winning

*Counsel for Official Committee of Unsecured Creditors*

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

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	:	
In re:	:	Chapter 11
	:	
Miami Metals I, Inc., <i>et al.</i> <sup>1</sup>	:	Case No. 18-13359 (shl)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**NOTICE OF SERVICE OF SEVENTH MONTHLY FEE AND EXPENSE  
STATEMENT OF COOLEY LLP FOR THE PERIOD  
MAY 1, 2019 THROUGH MAY 31, 2019**

**PLEASE TAKE NOTICE** that Cooley LLP (“Cooley”), counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Miami Metals I, Inc., et al., (f/k/a Republic Metals Refining Corporation) (collectively, the “Debtors”) has filed its Seventh Monthly Fee and Expense Statement of Cooley LLP for the Period of May 1, 2019 through May

<sup>1</sup> 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), 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).

31, 2019 (the “Statement”), with the United States Bankruptcy Court for the Southern District of New York, New York 10004 (the “Bankruptcy Court”) and served the Statement pursuant to the Bankruptcy Court’s *Order Pursuant To 11 U.S.C. §§ 105(A), 330, 331, and 363, Fed. R Bankr. P. 2016, and Local Rule 2016-1, Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 346] (the “Interim Compensation Order”) on the Notice Parties, as defined therein. Pursuant to the Statement, Cooley seeks compensation for services rendered in the amount of \$457,486.40 and reimbursement of costs in the amount of \$27,288.63.

On June 28, 2019, Cooley served the Statement pursuant to the Interim Compensation Order on the Notice Parties, as defined therein.

Dated: June 28, 2019  
New York, New York

By: /s/ Seth Van Aalten  
Seth Van Aalten  
Robert Winning  
Sarah Carnes  
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*Counsel to the Official Committee of  
Unsecured Creditors*

**Response Deadline: July 8, 2019 at 5:00 p.m. (ET)**

**COOLEY LLP**

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**UNITED STATES BANKRUPTCY COURT  
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In re:	:	Chapter 11
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Miami Metals I, Inc., <i>et al.</i> <sup>2</sup>	:	Case No. 18-13359 (shl)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**NOTICE OF SEVENTH MONTHLY FEE AND EXPENSE STATEMENT OF  
COOLEY LLP FOR THE PERIOD MAY 1, 2019 THROUGH  
MAY 31, 2019**

1. In accordance with the *Order Pursuant To 11 U.S.C. §§ 105(A), 330, 331, and 363, Fed. R Bankr. P. 2016, and Local Rule 2016-1, Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 346] (the “Interim

<sup>2</sup> 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), 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).

Compensation Order”), Cooley LLP (“Cooley”), counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Miami Metals I, Inc., *et al.*, (f/k/a Republic Metals Refining Corporation) (collectively, the “Debtors”), hereby submits its Seventh Monthly Fee and Expense Statement (the “Statement”) for the period from May 1, 2019 through May 31, 2019 (the “Statement Period”).<sup>3</sup>

#### **ITEMIZATION OF SERVICES RENDERED AND EXPENSES INCURRED**

2. A summary of the services rendered by Cooley for which compensation is sought for the Statement Period, organized by project category, is attached hereto as **Exhibit A**.

3. A listing of Cooley attorneys and paraprofessionals (collectively, the “Timekeepers”) who rendered services to the Committee in connection with these chapter 11 cases during the Statement Period, including the hourly rate, title, practice group, first bar admission year (where applicable), area of expertise, and fees earned by each Timekeeper, is attached hereto as **Exhibit B**. The blended hourly billing rates during the Statement Period were (a) **\$529.93**/hour for all Timekeepers, and (b) **\$924.44**/hour for all attorneys.<sup>4</sup>

4. A summary of expenses incurred by Cooley during the Statement Period for which reimbursement is sought is attached hereto as **Exhibit C**.

#### **TOTAL FEES AND EXPENSES SOUGHT FOR THE STATEMENT PERIOD**

5. The total amounts sought for fees for professional services rendered and reimbursement of expenses incurred for the Statement Period are as follows:

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<sup>3</sup> Pursuant to the *Order Authorizing the Employment and Retention of Cooley LLP as Counsel to the Official Committee of Unsecured Creditors*, Cooley has been retained *nunc pro tunc* to November 19, 2018 [D.I. 421].

<sup>4</sup> The blended rate for attorneys does not include fees and hours billed by law clerks and contract attorneys.

Fees	\$457,486.40
Disbursements	\$27,288.63
<b>Total</b>	<b>\$484,775.03</b>

**NOTICE AND OBJECTION PROCEDURES**

6. In accordance with the Interim Compensation Order, notice of the Statement has been served upon the following parties (collectively, the “Notice Parties”): (a) the Debtors, c/o Republic Metals Refining Corporation (Attn: Scott Avila); (b) the attorneys for the Debtors, 2001 Ross Avenue, Suite 3600, Dallas, TX 75201 (Attn: John Mitchell, Esq.) and Akerman, LLP, 98 Southeast Seventh Street, Suite 1100, Miami, FL 33131 (Attn: Andrea S. Hartley, Esq.) (c) the attorneys to the Debtors’ prepetition senior secured lenders, Luskin, Stern & Eisler, LLP, Eleven Times Square, New York, NY 10036 (attn. Michael Luskin, Esq., Richard Stern, Esq., and Alex Talesnick, Esq.) and (d) Office of the United States Trustee, 201 Varick Street, Suite 1006, New York, NY 10014 (attn. Shannon Scott, Esq.).

7. Also pursuant to the Interim Compensation Order, any objections to this Statement must be served upon the Notice Parties, including Cooley, no later than **July 8, 2019 at 5:00 p.m.** prevailing Eastern Time (the “Objection Deadline”), setting forth the nature of the objection and the specific amount of fees or expenses at issue.

8. If no objections to the Statement are received on or before the Objection Deadline, the Debtors, pursuant to the Interim Compensation Order, will be authorized to pay Cooley, on an interim basis, **\$393,277.75**, consisting of (a) 80% of Cooley’s fees for the Statement Period, and (b) 100% of total expenses incurred.

9. To the extent an objection to the Statement is received on or before the Objection Deadline, the Debtors will withhold payment of that portion of the Statement to which the objection is directed and will promptly pay the remainder of the fees and disbursements in the

percentages set forth above. To the extent such objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing.

Dated: June 28, 2019  
New York, New York

By: /s/ Seth Van Aalten  
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Robert Winning  
Sarah Carnes  
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*Counsel to the Official Committee of  
Unsecured Creditors*

**EXHIBIT A**

**SUMMARY OF COMPENSATION BY PROJECT CATEGORY  
DURING COMPENSATION PERIOD  
MAY 1, 2019 THROUGH MAY 31, 2019**

<b>Subject Matter Categories</b>		<b>Hours Spent</b>	<b>Fees</b>
B02	Asset Disposition	0.2	\$134.00
B04	Case Administration	4.0	\$1,964.50
B05	Claims	87.2	\$81,006.00
B07	Fee/Employment Applications	8.4	\$3,534.50
B08	Fee/Employment Objections	0.4	\$110.00
B09	Financing and Cash Collateral	1.8	\$1,719.00
B10	Litigation	715.8	\$327,797.90
B11	Meetings	21.3	\$19,878.50
B12	Plan and Disclosure Statement	12.9	\$11,149.50
B13	Relief From Stay Proceedings	1.1	\$907.50
B18	Leases and Executory Contracts	2.0	\$1,710.50
B19	Preparation For and Attendance at Court Hearings	4.7	\$4,232.00
B23	Avoidance Actions	3.5	\$3,342.50
	<b>Total</b>	<b>863.3</b>	<b>\$457,486.40</b>



**EXHIBIT B**

**COMPENSATION BY TIMEKEEPER DURING COMPENSATION PERIOD  
MAY 1, 2019 THROUGH MAY 31, 2019**

<b>Name of Professional Person</b>	<b>Position of the Applicant, Year of Obtaining License to Practice, Area of Expertise</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Ian Shapiro	Partner; Member of the New York Bar since 2001; Area of Expertise: Business Litigation	\$1,065	15.4	\$16,401.00
Seth Van Aalten	Partner; Member of New York Bar since 2004; Area of Expertise: Bankruptcy	\$995	6.2	\$6,169.00
Adriana Lofaro Wirtz	Partner; Member New York Bar since 2009; Area of Expertise: Tax	\$980	97.5	\$95,550.00
Reed Smith	Special Counsel; Member of New York Bar since 1999; Area of Expertise: Business Litigation	\$960	76.1	\$73,056.00
Robert Winning	Special Counsel; Member of New York Bar since 2011; Area of Expertise: Bankruptcy	\$955	115.2	\$110,016.00
Nicholas Flath	Associate; Member of New York Bar since 2012; Area of Expertise: Business Litigation	\$955	2.8	\$2,674.00
David Bright	Associate; Member of New York Bar since 2014; Area of Expertise: Business Litigation	\$825	7.2	\$5,940.00
Sarah Carnes	Associate; Member of New York Bar since 2015; Area of Expertise: Bankruptcy	\$825	61.2	\$50,490.00
Paul Springer	Associate; Member of New York Bar since 2016; Area of Expertise: Bankruptcy	\$670	8.0	\$5,360.00
Joseph Brown	Associate; Member of New York Bar since 2017; Area of Expertise: Bankruptcy	\$670	21.6	\$14,472.00
Brett Mead	Other timekeeper (Law Clerk – Business Litigation)	\$505	107.6	\$54,338.00
Candice Aiken	Other timekeeper (Contract Attorney)	\$62	106.3	\$6,590.60
Ayoola Badejo	Other timekeeper (Contract Attorney)	\$62	60.0	\$3,720.00
Lorin Schneider	Other timekeeper (Contract Attorney)	\$62	64.3	\$3,986.60

Diane Bobb	Other timekeeper (Contract Attorney)	\$62	106.1	\$6,578.20
Mollie Canby	Paralegal	\$275	7.8	\$2,145.00
<b>TOTAL</b>			<b>863.3</b>	<b>\$457,486.40</b>
<b>Blended Hourly Rate for All Timekeepers</b>				<b>\$529.93</b>
<b>Blended Rate for Attorneys<sup>5</sup></b>				<b>\$924.44</b>

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<sup>5</sup> The blended hourly rate for attorneys does not include fees and hours billed by law clerks and contract attorneys.

**EXHIBIT C**

**EXPENSE SUMMARY  
DURING COMPENSATION PERIOD  
MAY 1, 2019 THROUGH MAY 31, 2019**

<b>Expense Category</b>	<b>Total Expenses</b>
Car Service	\$407.89
FedEx	\$107.12
Monthly Storage/User Access Fee (April 2019 – TransPerfect Document Management Inc.)	\$11,307.70
Meals	\$1,951.68
Outsourced binder preparations and document coding (TransPerfect Document Management, Inc.)	\$5,847.92
Reproduction of Documents	\$173.00
Research Database / Document Retrieval	\$7,237.25
Transportation	\$256.07
<b>Total</b>	<b>\$27,288.63</b>

**MEAL EXPENSE DETAIL**

<b>Date</b>	<b>Total Amount</b>	<b>Description</b>	<b>Professional</b>
1/30/19	\$31.10	Working meal (late night)	B. Mead
2/2/19	\$24.74	Working meal (weekend)	N. Flath
2/4/19	\$165.09	Working meal (document review)	Contract Attorneys
2/5/19	\$31.57	Working meal	N. Flath
2/8/19	\$35.85	Working meal	N. Flath
2/9/19	\$30.48	Working meal (weekend)	N. Flath
2/11/19	\$26.63	Working meal	S. Carnes
2/13/19	\$22.75	Working meal	S. Carnes
2/19/19	\$61.11	Working meal	R. Winning
2/20/19	\$41.38	Working meal	R. Winning
2/22/19	\$174.92	Working meal (document review)	Contract Attorneys
2/26/19	\$24.58	Working meal	R. Winning
2/27/19	\$164.40	Working meal (document review)	Contract Attorneys
2/27/19	\$29.92	Working meal	N. Flath
3/18/19	\$118.61	Working meal (document review)	Contract Attorneys
3/25/19	\$398.42	Working meal for litigation team during internal session	N. Flath, R. Winning, I. Shapiro, A. Wirtz, B. Mead
4/9/19	\$63.52	Working meal	S. Carnes
4/11/19	\$30.00	Working meal (late night)	B. Mead
4/13/19	\$2.18	Working meal (weekend)	D. Bright
4/13/19	\$11.43	Working meal (weekend)	D. Bright
4/14/19	\$18.87	Working meal (weekend)	R. Rizkalla
4/14/19	\$45.00	Working meal (weekend)	B. Mead
4/15/19	\$30.00	Working meal (late night)	B. Mead
4/15/19	\$6.76	Working meal	D. Bright
4/16/19	\$12.37	Working meal	D. Bright
4/16/19	\$6.41	Working meal	D. Bright
4/16/16	\$10.83	Working meal	D. Bright
4/16/19	\$30.00	Working meal (late night)	B. Mead
4/17/19	\$8.67	Working meal	D. Bright
4/18/19	\$23.64	Working meal	D. Bright
4/18/19	\$4.36	Working meal	D. Bright
4/18/19	\$30.00	Working meal (late night)	B. Mead
4/19/19	\$25.76	Working meal	D. Bright
4/20/19	\$2.18	Working meal (weekend)	D. Bright
4/20/19	\$9.07	Working meal (weekend)	D. Bright
4/20/19	\$17.89	Working meal (weekend)	B. Mead
4/20/19	\$2.18	Working meal (weekend)	D. Bright
4/20/19	\$2.18	Working meal (weekend)	D. Bright
4/21/19	\$14.68	Working meal (weekend)	B. Mead
4/21/19	\$15.00	Working meal (weekend)	D. Bright
4/22/19	\$11.83	Working meal	D. Bright
4/22/19	\$30.00	Working meal (late night)	B. Mead
4/22/19	\$10.62	Working meal	D. Bright
4/22/19	\$7.87	Working meal	D. Bright
4/30/19	\$29.67	Working meal (late night)	B. Mead

5/16/19	\$57.16	Working meal	R. Winning
<b>Total</b>	<b>\$1,951.68</b>		

**TRAVEL EXPENSE DETAIL**

<b>Dept. Date</b>	<b>Total Amount</b>	<b>Description</b>	<b>Traveler</b>
2/15/19	\$21.96	Transportation from office to meeting at EisnerAmper's office	I. Shapiro
2/15/19	\$22.56	Transportation to office after meeting at EisnerAmper's office	I. Shapiro
3/11/19	\$20.76	Transportation from office to meeting at Akerman LLP's office	I. Shapiro
4/12/19	\$120.57	Late night transportation from office to home	N. Flath
4/12/19	\$18.53	Late night transportation from office to home	N. Flath
4/13/19	\$10.62	Weekend transportation from office to home	D. Bright
4/13/19	\$15.58	Weekend transportation from office to home	N. Flath
4/13/19	\$101.39	Weekend transportation from office to home	N. Flath
4/14/19	\$28.34	Weekend transportation from office to home	B. Mead
4/15/19	\$10.62	Late night transportation from office to home	D. Bright
4/15/19	\$28.50	Late night transportation from office to home	B. Mead
4/15/19	\$10.11	Late night transportation from office to home	D. Bright
4/17/19	\$23.36	Late night transportation from office to home	B. Mead
4/18/19	\$31.30	Late night transportation from office to home	B. Mead
4/20/19	\$11.98	Weekend transportation from office to home	D. Bright
4/22/19	\$22.44	Late night transportation from office to home	B. Mead
4/30/19	\$24.52	Late night transportation from office to home	B. Mead
5/8/19	\$39.41	Late night transportation from office to home	A. Wirtz
5/9/19	\$40.83	Late night transportation from office to home	A. Wirtz
5/13/19	\$60.58	Late night transportation from office to home	A. Wirtz
<b>Total</b>	<b>\$663.96</b>		