

COOLEY LLP

55 Hudson Yards
New York, New York 10001
Telephone: (212) 479-6000
Facsimile: (212) 479-6275
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> ¹	:	Case No. 18-13359 (shl)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**NOTICE OF SERVICE OF EIGHTH MONTHLY FEE AND EXPENSE
STATEMENT OF COOLEY LLP FOR THE PERIOD
JUNE 1, 2019 THROUGH JUNE 30, 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 Eighth Monthly Fee and Expense Statement of Cooley LLP for the Period of June 1, 2019 through June 30, 2019

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), 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).

(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 \$275,536.00 and reimbursement of costs in the amount of \$18,009.53.

On August 9, 2019, Cooley served the Statement pursuant to the Interim Compensation Order on the Notice Parties, as defined therein.

Dated: August 9, 2019
New York, New York

By: /s/ Seth Van Aalten
Seth Van Aalten
Robert Winning
Sarah Carnes
COOLEY LLP
55 Hudson Yards
New York, New York 10001
Telephone: (212) 479-6000
Facsimile: (212) 479-6275
Email: svanaalten@cooley.com
rwinning@cooley.com
scarnes@cooley.com

*Counsel to the Official Committee of
Unsecured Creditors*

Response Deadline: August 19, 2019 at 5:00 p.m. (ET)

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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> ²	:	Case No. 18-13359 (shl)
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Debtors.	:	(Jointly Administered)
	:	
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**NOTICE OF EIGHTH MONTHLY FEE AND EXPENSE STATEMENT OF
COOLEY LLP FOR THE PERIOD JUNE 1, 2019 THROUGH
JUNE 30, 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

² 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 Eighth Monthly Fee and Expense Statement (the “Statement”) for the period from June 1, 2019 through June 30, 2019 (the “Statement Period”).³

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) **\$821.27**/hour for all Timekeepers, and (b) **\$953.05**/hour for all attorneys.⁴

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:

³ 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].

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

Fees	\$275,536.00
Disbursements	\$18,009.53
Total	\$293,545.53

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 **August 19, 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, **\$238,438.33**, 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: August 9, 2019
New York, New York

By: /s/ Seth Van Aalten
Seth Van Aalten
Robert Winning
Sarah Carnes
COOLEY LLP
55 Hudson Yards
New York, New York 10001
Telephone: (212) 479-6000
Facsimile: (212) 479-6275
Email: svanaalten@cooley.com
rwinning@cooley.com
scarnes@cooley.com

*Counsel to the Official Committee of
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EXHIBIT A

**SUMMARY OF COMPENSATION BY PROJECT CATEGORY
DURING STATEMENT PERIOD
JUNE 1, 2019 THROUGH JUNE 30, 2019**

Subject Matter Categories		Hours Spent	Fees
B04	Case Administration	2.5	\$1,163.50
B05	Claims	76.3	\$73,227.50
B07	Fee/Employment Applications	4.7	\$1,654.50
B09	Financing and Cash Collateral	17.7	\$16,903.50
B10	Litigation	200.4	\$149,630.50
B11	Meetings	5.2	\$4,966.00
B12	Plan and Disclosure Statement	1.2	\$1,194.00
B19	Preparation For and Attendance at Court Hearings	25.7	\$25,077.50
B23	Avoidance Actions	1.8	\$1,719.00
	Total	335.5	\$275,536.00

EXHIBIT B

**COMPENSATION BY TIMEKEEPER
DURING STATEMENT PERIOD
JUNE 1, 2019 THROUGH JUNE 30, 2019**

Name of Professional Person	Position of the Applicant, Year of Obtaining License to Practice, Area of Expertise	Hourly Billing Rate	Total Billed Hours	Total Compensation
Ian Shapiro	Partner; Member of the New York Bar since 2001; Area of Expertise: Business Litigation	\$1,065	5.3	\$5,644.50
Seth Van Aalten	Partner; Member of New York Bar since 2004; Area of Expertise: Bankruptcy	\$995	19.5	\$19,402.50
Adriana Lofaro Wirtz	Partner; Member New York Bar since 2009; Area of Expertise: Tax	\$980	29.4	\$28,812.00
Reed Smith	Special Counsel; Member of New York Bar since 1999; Area of Expertise: Business Litigation	\$960	65.8	\$63,168.00
Robert Winning	Special Counsel; Member of New York Bar since 2011; Area of Expertise: Bankruptcy	\$955	94.5	\$90,247.50
Nicholas Flath	Associate; Member of New York Bar since 2012; Area of Expertise: Business Litigation	\$955	8.4	\$8,022.00
Sarah Carnes	Associate; Member of New York Bar since 2015; Area of Expertise: Bankruptcy	\$825	12.4	\$10,230.00
Joseph Brown	Associate; Member of New York Bar since 2017; Area of Expertise: Bankruptcy	\$670	4.5	\$3,015.00
Brett Mead	Other timekeeper (Law Clerk – Business Litigation)	\$505	89.9	\$45,399.50
Mollie Canby	Paralegal	\$275	5.8	\$1,595.00
TOTAL			335.5	\$275,536.00
Blended Hourly Rate for All Timekeepers				\$821.27
Blended Rate for Attorneys⁵				\$953.05

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

EXHIBIT C

**EXPENSE SUMMARY
DURING STATEMENT PERIOD
JUNE 1, 2019 THROUGH JUNE 30, 2019**

Expense Category	Total Expenses
Car Service	\$88.71
Document Preparation	\$66.00
Monthly Storage/User Access Fee (May 2019 – TransPerfect Document Management Inc.)	\$6,203.97
Meals	\$1,293.46
Outsourced reproduction of documents (TransPerfect Document Management, Inc.)	\$1,773.43
Reproduction of Documents	\$27.10
Research Database / Document Retrieval	\$8,493.43
Transportation	\$63.43
Total	\$18,009.53

MEAL EXPENSE DETAIL

Date	Total Amount	Description	Professional
1/24/19	\$25.11	Working meal (late night)	R. Winning
3/18/19	\$14.61	Working meal (prepare for witness interview)	N. Flath
3/18/19	\$5.17	Working meal (prepare for witness interview)	N. Flath
3/25/19	\$302.23	Working meal for litigation team (fact discovery phase)	R. Winning, N. Flath, I. Shapiro, B. Mead
4/12/19	\$30.00	Working meal (attend to discovery)	N. Flath
4/13/19	\$23.95	Working meal (attend to audit)	N. Flath
4/23/19	\$105.35	Working meal for litigation team (document review)	I. Shapiro
4/23/19	\$174.19	Working meal for litigation team (document review)	I. Shapiro
4/23/19	\$457.28	Meal for meeting with Committee presenting investigation findings	I. Shapiro
5/20/19	\$27.38	Working meal (late night)	S. Carnes
6/26/19	\$22.86	Working meal	I. Shapiro
6/26/19	\$42.13	Working meal (bankruptcy team meeting)	J. Brown
6/26/19	\$21.07	Working meal	I. Shapiro
6/26/19	\$42.13	Working meal	I. Shapiro
Total	\$1,293.46		

TRAVEL EXPENSE DETAIL

Dept. Date	Total Amount	Description	Traveler
4/9/19	\$29.73	Transportation from meetings to home	S. Carnes
5/22/19	\$63.43	Late night transportation from office to home	R. Smith
6/13/19	\$58.98	Transportation from home to Court in connection with attendance at settlement hearing	A. Wirtz
Total	\$152.14		