

John E. Mitchell (Admitted *Pro Hac Vice*)  
Yelena Archiyani (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 Gelfand (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> <sup>1</sup>	)	Case No. 18-13359 (shl)
	)	
Debtors.	)	(Jointly Administered)
	)	

**NOTICE OF AGENDA FOR MATTERS SCHEDULED FOR  
HEARING ON OCTOBER 7, 2019 AT 11:00 A.M.**

Time and Date of Hearing: October 7, 2019 at 11:00 a.m. (Prevailing Eastern Time)

Location of Hearing: United States Bankruptcy Court for the Southern District of New York, before the Honorable Sean H. Lane, United States Bankruptcy Judge, **Room 701**, One Bowling Green, New York, NY 10004-1408

**PLEASE TAKE NOTICE** that an agenda with respect to all matters set for hearing on **October 7, 2019 at 11:00 a.m. (EST)** is set forth below. Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Court’s website at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), (ii) contacting the Office of the Clerk of Court at One Bowling Green, New York, New York 10004, or (iii) from the Debtors’ claims and noticing agent, Donlin Recano ("Donlin"), at [www.donlinrecano.com/republicmetals](http://www.donlinrecano.com/republicmetals). Note that a PACER password is required to access documents on the Court’s website.

<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), 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).

**AGENDA**

**A. STATUS CONFERENCE**

1. Case Status Update

**B. UNCONTESTED MATTERS**

**2. Debtors' Motion for Approval of Settlement Agreement by and Among Debtors, Senior Lenders, and Yamana Gold, Inc. Pursuant to Fed. R. Bankr. P. 9019 [ECF No. 1415].**

- a. Response Deadline: September 30, 2019 at 4:00 p.m. (EDT)
- b. Responses Received: None.
- c. Related Documents:
  - i. Declaration of Scott Avila in Support of Motion [ECF No. 1458].
- d. Status: Going forward on final basis.

**C. CONTESTED MATTERS**

**3. Debtors' Motion for Entry of an Order Under Bankruptcy Code Section 105(a) and 363(b) Authorizing Debtors to Enter Into and Perform Under Amended Plan Support Agreement [ECF No. 1413].**

- a. Response Deadline: September 30, 2019 at 4:00 p.m. (EDT)
- b. Responses Received:
  - i. Limited Objection of SCMI US, Inc. [ECF No. 1453].
  - ii. Omnibus Objection of Fundacion Rafael Donde, I.A.P. [ECF No. 1455].
- c. Related Documents:
  - i. Joint Omnibus Reply of Debtors, Senior Lenders, and Official Committee of Unsecured Creditors to Objections to the (i) Amended Disclosure Statement for Amended Joint Chapter 11 Plan of Liquidation of Debtors, (ii) Motion to Approve the Amended Plan Support Agreement, and (iii) Entry of a Final Cash Collateral Order [ECF No. 1459].
  - ii. Declaration of Scott Avila in Support Debtor's Motion [ECF No. 1462].
- d. Status: Going forward on final basis.

**4. Debtors' Motion for Entry of Order Approving (I) the Adequacy of the Disclosure Statement; (II) Solicitation and Notice Procedures; (III) Forms of Ballots and Notices in Connection Therewith; and (IV) Certain Dates with Respect Thereto [ECF No. 1297].**

- a. Response Deadline: September 30, 2019 at 4:00 p.m. (EDT)
- b. Responses Received:
  - i. Objection of the United States Trustee [ECF No. 1452].
  - ii. Omnibus Objection of Fundacion Rafael Donde, I.A.P. [ECF No. 1455].
- c. Related Documents:
  - i. Notice of Filing of (i) Amended Joint Disclosure Statement for Amended Joint Chapter 11 Plan of Liquidation of Debtors and (ii) Amended Joint Chapter 11 Plan of Liquidation [ECF No. 1409].
  - ii. Notice of Filing of Revised Proposed Confirmation Timeline in Connection with Debtors' Motion for Approval of Amended Joint Disclosure Statement for Amended Joint Chapter 11 Plan of Liquidation of Debtors [ECF No. 1410].
  - iii. Notice of Adjournment of Hearing on (i) Debtors' Motion to Approve Use of Cash Collateral on a Final Basis and (ii) Motion to Approve Joint Disclosure Statement, as Amended, for Amended Joint Chapter 11 Plan of Liquidation of Debtors [ECF No. 1412].
  - iv. Joint Omnibus Reply of Debtors, Senior Lenders, and Official Committee of Unsecured Creditors to Objections to the (i) Amended Disclosure Statement for Amended Joint Chapter 11 Plan of Liquidation of Debtors, (ii) Motion to Approve the Amended Plan Support Agreement, and (iii) Entry of a Final Cash Collateral Order [ECF No. 1459].
  - v. Declaration of Scott Avila in Support of Amended Disclosure Statement for Amended Joint Chapter 11 Plan of Liquidation of Debtors [ECF No. 1462].
- d. Status: Going forward on final basis.

**5. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to the Secured Parties, (III) Scheduling a Final Hearing and (IV) Granting Related Relief [ECF No. 10].**

- a. Response Deadline: November 21, 2018 at 4:00 p.m. (EST)

b. Responses Filed:

- i. Limited Objection of Alamos Gold Inc. and its Subsidiaries, Minas de Oro Nacional, S.A. de C.V. and Minera Santa Rita S. de R.L. de C.V. to the Debtors Cash Collateral Motion and Supplement to the Cash Collateral Motion [**ECF No. 121**].
- ii. Limited Objection SCMI US Inc. to the Debtors' Cash Collateral Motion and Joint Supplement to the Cash Collateral Motion [**ECF No. 137**].
- iii. Limited Objection of Premier Gold Mines Limited to Debtors' Motion for Entry of Final Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection of the Secured Parties and (III) Granting Related Relief [**ECF No. 144**].
- iv. Objection of Coeur Mining, Inc., Coeur Mexicana S.A. De C.V., Coeur Rochester, Inc. and Wharf Resources (U.S.A.), Inc. to (A) Debtors' Motion for Entry of Final Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection of the Secured Parties and (III) Granting Related Relief, and (B) Joint Supplement of the Debtors and the Senior Lenders to the Cash Collateral Motion [**ECF No. 146**].
- v. Joint Objection of Argonaut Gold Inc., First Majestic Silver Corp., and Mitchell T. Levine to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to the Secured Parties, (III) Scheduling a Final Hearing and (iv) Granting Related Relief [**ECF No. 147**].
- vi. Objection of Midwest Refineries, LLC to Entry of Final Case Collater [*sic*] Order [**ECF No. 148**].
- vii. Limited Objection and Reservation of Rights Re: Debtor's Motion for Use of Cash Collateral filed by Alex Morningstar Corp., Deb Schott, Inc., FCP Diamonds, LLC, Mid-States Recycling, Inc., and Noble Metal Services, Inc. [**ECF No. 152**].
- viii. Texas Precious Metals L.L.C.'s Joinder and Limited Objection to the Debtors' Cash Collateral Motion and Supplement to the Cash Collateral Motion and Reservation of Rights [**ECF No. 154**].
- ix. Limited Objection of Music City Group, LLC to Debtors' Motion to Use Cash Collateral [**ECF No. 157**].
- x. Limited Objection of Minas de Oroco Resources, S.A. de C.V. to Debtors' Motion to Use Cash Collateral [**ECF No. 158**].

- xi. Limited Objection of Tiffany and Company, on its own behalf and on behalf of Laurelton Sourcing, LLC to (A) Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection of the Secured Parties, (III) Scheduling a Final Hearing and (IV) Granting Related Relief, and (B) Joint Supplement of the Debtors and the Senior Lenders to the Cash Collateral Motion [**ECF No. 159**].
- xii. Objection of Pretium Exploration Inc. to the Debtors' Motion for Entry of a Final Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to the Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [**ECF No. 161**].
- xiii. Yamana Gold Inc.'s Limited Objection to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to the Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [**ECF No. 162**].
- xiv. Limited Objection of Design Gold Group, Inc. to Motion to (I) Approve Use of Cash Collateral, (II) Granting Adequate Protection to the Secured Parties, and (III) Scheduling a Final Hearing [**ECF No. 163**].
- xv. Limited Objection of Pyropure, Inc. D/B/A Pyromet to the Debtors' Cash Collateral Motion and Supplement to the Cash Collateral Motion [**ECF No. 164**].
- xvi. Limited Objection, Joinder and Reservation of Rights Concerning Debtors' Motion Seeking Authorization to Use Cash Collateral and Certain Related Relief filed by 7645635 Canada Inc. o/a Ottawa Gold Buyer, Pollock-Cameron Investments Corporation o/a Vancouver Gold Buyer, and 7907109 Canada Inc. [**ECF No. 174**].
- xvii. Objection, Joinder, and Reservation of Rights of Compania Minera Dolores, S.A. de C.V. and Minera Triton Argentina SA to the Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to the Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [**ECF No. 178**].
- xviii. So Accurate Group, Inc.'s Limited Objection, Joinder, and Reservation of Rights to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors' Use of Cash Collateral, (II) Granting Adequate Protection to the Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [**ECF No. 181**].

- xix. Limited Objection of Brilliant Jewelers/MJJ Inc. to Debtors' Cash Collateral Motion and Supplement to the Cash Collateral Motion and Reservation of Rights [ECF No. 185].
  - xx. Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of Interim and Final Orders (i) Authorizing the Debtors' Use of Cash Collateral, (ii) Granting Adequate Protection to the Secured Parties, (iii) Scheduling a Final Hearing and (iv) Granting Related Relief, and the Supplemental Motion [ECF No. 193].
  - xxi. Objection of Jason Rubin, Rose Rubin, Lindsey Rubin, the Second Amended and Restated Rose Rubin Revocable Trust U/D/A 9/25/2013, the Amended and Restated Richard Rubin Revocable Trust U/D/A 12/8/2008, Republic Metals Warehouse LLC, Richard Rubin Linday Investments, LLC, Jason Ross Rubin Enterprises LLC, and RRLJ12 LLC to the Debtors' Motion for Entry of a Final Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to the Secured Parties, (III) Scheduling a Final hearing and (IV) Granting Related Relief [ECF No. 199].
  - xxii. Omnibus Reply of the Senior Lenders to Objections to the Debtors' Cash Collateral Motion [ECF No. 208].
  - xxiii. Amended Limited Objection of SCMI US, Inc. to the Debtors' Chas Collateral Motion and Joint Supplement to the Cash Collateral Motion [ECF No. 1406].
  - xxiv. Limited Objection of Mitchell Levine, Erie Management Partners, LLC and Plat/Co to Debtors' Notice of Submission of Proposed Twelfth Interim Cash Collateral Order, Blackline Order, and Proposed Twelfth Interim Cash Collateral Budget [ECF No. 1451].
  - xxv. Omnibus Objection of Fundacion Rafael Donde, I.A.P. [ECF No. 1455].
- c. Related Documents:
- i. Notice of Proposed Amended Cash Collateral Budget [ECF No. 32].
  - ii. Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [ECF No. 54].
  - iii. Joint Supplement of the Debtors and the Senior Lenders to the Cash Collateral Motion [ECF No. 78].
  - iv. Notice of Filing Proposed Order [ECF No. 167].

- v. Motion of Coeur Mining, Inc., Coeur Mexicana S.A. De C.V., Coeur Rochester, Inc. and Wharf Resources (U.S.A.), Inc. to (a) File Documents under Seal and (b) Redact Commercially Sensitive, Nonpublic Information [**ECF No. 145**].
- vi. Yamana Gold, Inc. Ex Parte Motion for Entry of an Order to (i) File a Document Under Seal and (ii) Redact Commercially Sensitive, Nonpublic Information [**ECF No. 165**].
- vii. Declaration of Atul Kampani in Support of Limited Objection of Brilliant Jewelers/MJJ Inc. to Debtor's Final Motion to Use Cash Collateral, Granting Adequate Protection, Etc. [**ECF No. 186**].
- viii. Notice of Proposed Order Continuing Final Hearing on Cash Collateral [**ECF No. 209**].
- ix. Notice of Proposed Interim Cash Collateral Budget [**ECF No. 212**].
- x. Notice of Proposed Second Interim Cash Collateral Order and Budget [**ECF No. 255**].
- xi. Notice of Proposed Alternative Second Interim Cash Collateral Order [**ECF No. 260**].
- xii. Second Interim Order on Cash Collateral [**ECF No. 277**].
- xiii. Notice of Proposed Third Interim Cash Collateral Order [**ECF No. 318**].
- xiv. Notice of Proposed Third Interim Cash Collateral Budget [**ECF No. 323**].
- xv. Third Interim Order on Cash Collateral [**ECF No. 373**].
- xvi. Notice of Proposed Fourth Interim Cash Collateral Order and Budget [**ECF No. 515**].
- xvii. Fourth Interim Order on Cash Collateral [**ECF No. 538**].
- xviii. Notice of Filing Proposed Fifth Interim Order on Cash Collateral [**ECF No. 650**].
- xix. Notice of Filing Proposed Fifth Interim Cash Collateral Budget [**ECF No. 651**].
- xx. Fifth Interim Order on Cash Collateral [**ECF No. 675**].

- xxi. Notice of Proposed Six Interim Cash Collateral order, Blackline Order, and Budget [**ECF No. 834**].
- xxii. Sixth Interim Order on Cash Collateral [**ECF No. 864**].
- xxiii. Notice of Submission of Proposed Seventh Interim Cash Collateral Order and Blackline Order [**ECF No. 945**].
- xxiv. Notice of Filing Revised Blackline of Seventh Interim Cash Collateral Order [**ECF No. 949**].
- xxv. Notice of Submission of Revised Proposed Seventh Interim Cash Collateral Order, Blackline Order, and Budget [**ECF No. 952**].
- xxvi. Notice of Submission of Further Revised Proposed Seventh Interim Cash Collateral Order, Blackline Order, and Budget [**ECF No. 959**].
- xxvii. Seventh Interim Cash Collateral Order [**ECF No. 987**].
- xxviii. Notice of Submission of Proposed Eighth Interim Cash Collateral Order and Blackline Order [**ECF No. 1031**].
- xxix. Notice of Submission of Proposed Eighth Interim Cash Collateral Budget [**ECF No. 1043**].
- xxx. Eighth Interim Cash Collateral Order [**ECF No. 1160**].
- xxxi. Notice of Submission of Revised Final Cash Collateral Order, Blackline Orders, and Budget [**ECF No. 1189**].
- xxxii. Debtors' Notice of Submission of Ninth Interim Cash Collateral Budget [**ECF 1211**].
- xxxiii. Ninth Interim Cash Collateral Order [**ECF No. 1237**].
- xxxiv. Debtors' Notice of Submission of Extended Ninth Interim Cash Collateral Budget [**ECF No. 1291**].
- xxxv. Tenth Interim Cash Collateral Order [**ECF No. 1356**].
- xxxvi. Notice of Submission of Proposed Eleventh Interim Cash Collateral Order, Blackline Order, and Proposed Eleventh Interim Cash Collateral Budget [**ECF No. 1368**].
- xxxvii. Eleventh Interim Cash Collateral Order [**ECF No. 1392**].



- xxxviii. Notice of Submission of Proposed Final Cash Collateral Order and Blackline Order [**ECF No. 1411**].
  - xxxix. Notice of Adjournment of Hearing on (i) Debtors' Motion to Approve Use of Cash Collateral on a Final Basis and (ii) Motion to Approve Joint Disclosure Statement, as Amended, for Amended Joint Chapter 11 Plan of Liquidation of Debtors [**ECF No. 1412**].
  - xl. Debtors' Notice of Submission of Proposed Twelfth Interim Cash Collateral Order, Blackline Order, and Proposed Twelfth Interim Cash Collateral Budget [**ECF No. 1443**].
  - xli. Joint Omnibus Reply of Debtors, Senior Lenders, and Official Committee of Unsecured Creditors to Objections to the (i) Amended Disclosure Statement for Amended Joint Chapter 11 Plan of Liquidation of Debtors, (ii) Motion to Approve the Amended Plan Support Agreement, and (iii) Entry of a Final Cash Collateral Order [**ECF No. 1459**].
  - xlii. Debtors' Notice of Submission of Revised Proposed Final Cash Collateral Order, Blackline Order, and Budget [**ECF No. 1460**].
  - xliii. Debtors' Notice of Submission of Revised Proposed Final Cash Collateral Order, Blackline Order, and Budget [**ECF No. 1461**].
  - xliv. Declaration of Scott Avila in Support of Entry of Final Cash Collateral Order [**ECF No. 1462**].
- d. **Status:** Going forward on a final basis.

[SIGNATURE PAGE TO FOLLOW]

Dated: October 4, 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](mailto:andrea.hartley@akerman.com)  
E-Mail: [katherine.fackler@akerman.com](mailto:katherine.fackler@akerman.com)  
E-Mail: [joanne.gelfand@akerman.com](mailto:joanne.gelfand@akerman.com)

- and -

John E. Mitchell (*Admitted Pro Hac Vice*)  
Yelena Archiyan (*Admitted in New York*)  
2001 Ross Avenue, Suite 3600  
Dallas, TX 75201  
Tel.: (214) 720-4300  
Fax: (214) 981-9339  
E-Mail: [john.mitchell@akerman.com](mailto:john.mitchell@akerman.com)  
E-Mail: [yelena.archiyan@akerman.com](mailto:yelena.archiyan@akerman.com)

*Counsel for Debtors and Debtors-in-Possession*