

Benjamin Mintz  
Brendan M. Gibbons  
ARNOLD & PORTER KAYE SCHOLER LLP  
250 West 55th Street  
New York, NY 10019  
Telephone: (212) 836-8000  
Facsimile: (212) 836-8689

Charles A. Malloy  
ARNOLD & PORTER KAYE SCHOLER LLP  
601 Massachusetts Avenue, NW  
Washington, D.C. 20001  
Telephone: (202) 942-5000  
Facsimile: (202) 942-5999

*Counsel to Tiffany and Company*

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

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

**RESPONSE OF TIFFANY AND COMPANY TO DEBTORS’ AND SENIOR  
LENDERS’ MEMORANDUM OF LAW IN SUPPORT OF JOINT MOTION FOR  
SUMMARY JUDGMENT AS TO BUCKET 3, 4 AND 5 CUSTOMERS**

Tiffany and Company, on its own behalf and on behalf of its wholly-owned subsidiary Laurelton Sourcing, LLC (“**Tiffany**”), states as follows in response to the *Debtors’ and Senior Lenders’ Memorandum of Law in Support of Joint Motion for Summary Judgment as to Bucket 3, 4 and 5 Customers* (ECF 1202) (the “**Summary Judgment Motion**”):<sup>1</sup>

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<sup>1</sup> Unless otherwise defined herein, capitalized terms used in this Response shall have the meanings ascribed to them in the Summary Judgment Motion.

1. In response to the Summary Judgment Motion, Tiffany incorporates by reference the points and authorities set forth in the *Joint Response of Contract Customers to Debtors' and Senior Lenders' Joint Motion for Summary Judgment as to Bucket 1 Customers* (ECF 1119). Tiffany further reserves the right to raise additional claims, defenses, and legal theories in response to the Summary Judgment Motion and in connection with any subsequent motions, hearings, trials, or other proceedings related to Tiffany's claims in connection with the Ownership Disputes.

2. Pursuant to the Uniform Procedures Order, Tiffany is not responding to, and will not be bound by, supporting affidavits or any factual assertions made by the Debtors or Senior Lenders in connection with the Summary Judgment Motion, including without limitation factual assertions in the Avila Declaration or the *Joint Statement of Mutual Undisputed Facts pursuant to Local Bankr. Rule 7056-1* [ECF 1203].

Dated: October 11, 2019

Respectfully submitted,

/s/ Benjamin Mintz

Benjamin Mintz  
Brendan M. Gibbons  
ARNOLD & PORTER KAYE SCHOLER LLP  
250 West 55th Street  
New York, NY 10019  
Telephone: (212) 836-8000  
Facsimile: (212) 836-8689

-and-

Charles A. Malloy  
ARNOLD & PORTER KAYE SCHOLER LLP  
601 Massachusetts Avenue, NW  
Washington, D.C. 20001  
Telephone: (202) 942-5000  
Facsimile: (202) 942-5999

*Counsel to Tiffany and Company and  
Laurelton Sourcing, LLC*