

**PRESENTMENT DATE AND TIME: October 24, 2019 at 11:00 A.M. (EDT)**  
**OBJECTION DEADLINE DATE AND TIME: October 21, 2019 at 4:00 P.M. (EDT)**

**DLA PIPER LLP (US)**

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*Counsel to Fundación Rafael Dondé, I.A.P.*

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

In re

MIAMI METALS I, INC., *et al.*,

Debtors.

FUNDACIÓN RAFAEL DONDÉ, I.A.P., *et al.*,

Appellant,

v.

MIAMI METALS I, INC., *et al.*,

Appellees.

Chapter 11

Case No. 18-13359 (SHL)

(Jointly Administered)

Civil Case No. 1:19-cv-06610 (KPF)

**NOTICE OF PRESENTMENT OF STIPULATION AND ORDER CORRECTING AND  
SUPPLEMENTING APPELLATE RECORD**

**PLEASE TAKE NOTICE** that Fundación Rafael Dondé, I.A.P. (the “Foundation”) will present the *Stipulation and Order Correcting and Supplementing Appellate Record* (the “Stipulation and Order”) to the Honorable Sean H. Lane, United States Bankruptcy Judge, for

signature on **October 24, 2019 at 11:00 a.m. (Eastern Time)**. A copy of the Stipulation and Order is attached hereto as **Exhibit A**.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Stipulation and Order must: (i) be made in writing, (ii) state with particularity the grounds therefore, (iii) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with proof of service, with a courtesy copy delivered to the Chambers of the Honorable Sean H. Lane, One Bowling Green New York, New York 10004; and (iv) served upon (a) the Debtors, c/o Republic Metals Refining Corporation, (Attn: Scott Avila); (b) the attorneys for the Debtors, Akerman LLP, 2001 Ross Avenue, Suite 3600, Dallas, TX 75201 (Attn: John Mitchell, Esq.) and 98 Southeast Seventh Street, Suite 1100, Miami, FL 3313 (Attn: Andrea S. Hartley, Esq. and Katherine C. Fackler, Esq.); (c) counsel for the Committee, Cooley LLP, 1114 Avenue of the Americas, New York, New York 10016 (Attn: Seth Van Aalten, Esq. and Ian Shapiro, Esq.); (d) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Shannon Scott, Esq.); and (e) counsel for the Foundation, DLA Piper, LLP (US) 1251 Avenue of the Americas, New York, New York 10020-1104 (Attn: Richard F. Hans, Richard A. Chesley, and Rachel Ehrlich Albanese) so as to be received no later than **October 21, 2019 at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”).

**PLEASE TAKE FURTHER NOTICE** that if an objection is timely filed and served with respect to the Stipulation and Order, a hearing (the “Hearing”) will be held to consider such objection before the Honorable Sean H. Lane, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green New York, New York 10004 at a date and time to be determined.

**PLEASE TAKE FURTHER NOTICE** that any objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted upon default.

Dated: New York, New York  
October 16, 2019

**DLA PIPER LLP (US)**

/s/ Rachel Ehrlich Albanese

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