

Exhibit A

Stipulation and Order

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

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| In re MIAMI METALS I, INC., <i>et al.</i> , Debtors. | Chapter 11 Case No. 18-13359 (SHL) (Jointly Administered) |
| FUNDACIÓN RAFAEL DONDÉ, I.A.P., <i>et al.</i> , Appellant, v. MIAMI METALS I, INC., <i>et al.</i> , Appellees. | Civil Case No. 1:19-cv-06610 (KPF) |

**STIPULATION AND ORDER CORRECTING AND
SUPPLEMENTING APPELLATE RECORD**

The above-captioned debtors (the “Debtors”), on the one hand, and Fundación Rafael Donde, I.A.P. (the “Foundation”), on the other, hereby submit the following stipulation and order (the “Stipulation and Order”) to correct and supplement the record related to the Foundation’s appeal of the *Order Granting Debtors’ Emergency Motion (I) to Enforce Automatic Stay Against Fundacion Rafael Donde I.A.P., (II) to Hold Fundacion Rafael Donde I.A.P. in Contempt of Court, (III) for an Award of Sanctions Against Fundacion Rafael Donde I.A.P., and (IV) for Related Relief* (the “Sanctions Order”) pending before the U.S. District Court for the Southern District of New York (the “District Court”), Civil Case No. 19-cv-6610-KPF:

1. On June 28, 2019, the Foundation filed its *Notice of Appeal* of the Sanctions Order [ECF No. 1223].

2. On July 11, 2019, the Foundation filed the *Designation of Record and Statement of Issues by Appellant Fundación Rafael Dondé, I.A.P.* [ECF No. 1241] (the “Designation of Record”).

3. On August 6, 2019, the Clerk of Court entered the *Notice of Record of Appeal Availability (Completion)* reflecting that the record on appeal had been completed and was available electronically [District Court ECF No. 6].

4. The Foundation recently determined that it inadvertently omitted from the Designation of Record the following item (the “December 19, 2018 Transcript”):

| Docket Number | Document Name | Date Filed |
|---------------|--|-------------------|
| ECF No. 365 | Transcript regarding Hearing Held on 12/19/2018 at 11:13 am RE: Omnibus hearing Doc. #173 (Final) Emergency motion to allow entry of interim and final orders directing that certain orders in the Chapter 11 cases of Republic Metals Refining Corporation, et al. apply to all above-captioned cases | December 21, 2018 |

5. Pursuant to Rule 8009(e)(2)(A) of the Federal Rules of Bankruptcy Procedure, the Debtors and the Foundation hereby stipulate to correct and supplement the appellate record to add the December 19, 2018 Transcript.

6. The Debtors and the Foundation agree that the December 19, 2018 Transcript shall be made part of the appellate record and that a supplemental record should be certified and transmitted.

7. This Stipulation and Order is without prejudice to any further request to amend or supplement the appellate record by further stipulation or motion.

Dated: October 16, 2019

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/s/ Rachel Ehrlich Albanese

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Dated: October 16, 2019

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Counsel to Miami Metals I, Inc., et al.

SO ORDERED:

Dated: October __, 2019

/s/

HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE