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

In re:)	Chapter 11
)	
MIAMI METALS I, INC., <i>et al.</i> ¹)	Case No. 18-13359 (shl)
)	
Debtors.)	(Jointly Administered)
)	

**NOTICE OF AGENDA FOR MATTERS SCHEDULED FOR
HEARING ON DECEMBER 12, 2019 AT 11:00 A.M.**

Time and Date of Hearing: December 12, 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 **December 12, 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, (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. Note that a PACER password is required to access documents on the Court's website.

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), 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. CONTESTED MATTERS

1. Confirmation of Debtors' [Second] Amended Joint Chapter 11 Plan of Liquidation [ECF No. 1491-2].

- a. Response Deadline: October 24, 2019 at 4:00 p.m. (EDT)
- b. Responses Received:
 - i. U.S. Trustee's Reservation of Rights [ECF No. 1579].
 - ii. Objection to Confirmation by Midwest Refineries LLC [ECF No. 1580].
 - iii. Objection to Confirmation by Levine, Erie Management Partners and Plat/Co. [ECF No. 1582].
 - 1. Motion to Allow Objection to Confirmation [ECF No. 1632].
 - 2. Stipulation for Withdrawal of Motion to Allow Objection to Confirmation [ECF No. 1637].
 - iv. Objection to Confirmation by SCMI US Inc. [ECF No. 1586].
 - v. Objection to Confirmation by Fundación Rafael Dondé, I.A.P. [ECF No. 1608].
 - vi. Response of Fundación Rafael Dondé, I.A.P. to Debtors' Memorandum of Law in Support of Confirmation [ECF No. 1635].
- c. Related Documents:
 - i. Notice of Filing (i) Second Amended Joint Disclosure Statement and (ii) Second Amended Joint Plan of Liquidation of Debtors [ECF No. 1482].
 - ii. Order Approving (i) the Adequacy of the Second Amended 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. 1490].
 - iii. Amended Notice of Filing (i) Second Amended Joint Disclosure Statement for Amended Joint Chapter 11 Plan of Liquidation and (ii) Second Amended Joint Plan of Liquidation of Debtors [ECF No. 1491].
 - iv. Notice of Filing Plan Supplement [ECF No. 1555].
 - v. Voting Certification [ECF No. 1596].
 - vi. Final Voting Certification [ECF No. 1616].

- vii. Debtors' Memorandum of Law in Support of an Order Confirming Debtors' Joint Second Amended Chapter 11 Plan of Liquidation and Omnibus Reply to Plan Objections [ECF No. 1629].
- viii. Notice of Filing Declaration of Scott Avila in Support of Confirmation [ECF No. 1639].

d. **Status:** Going forward on final basis.

2. Objections to Presentment of Order Regarding Secure Data Rooms Maintained by Debtors Relating to Ownership Disputes [ECF No. 1585].

- a. **Response Deadline:** November 22, 2019 at 4:00 p.m. (EDT)
- b. **Responses Received:**
 - i. Objection by Alamos Gold, Inc., Minas de Oro Nacional, S.A. de C.V., and Minera Santa Rita S. De R.L. de C.V. [ECF No. 1579].
 - ii. Limited Objection by Mitchell Levine, Erie Management Partners and Plat/Co. [ECF No. 1598].
 - iii. Midwest Refineries, LLC's Joinder to Limited Objection [ECF No. 1602].
 - iv. The Gold Refinery, LLC's Joinder to Limited Objection [ECF No. 1603].
 - v. Fundación Rafael Dondé, I.A.P.'s Joinder to Limited Objection [ECF No. 1606].
 - vi. SCMI US Inc.'s Joinder to Limited Objection [ECF No. 1607].
- c. **Related Documents:**
 - i. Notice of Hearing on Objections [ECF No. 1613].
- d. **Status:** Going forward on final basis.

B. UNCONTESTED MATTERS

3. Debtors' Motion for Approval of Settlement Agreement by and Among Debtors, Senior Lenders, and Cyber Fox Trading Incorporated, Pursuant to Federal Rule of Bankruptcy Procedure 9019 [ECF No. 1522].

- a. **Response Deadline:** December 5, 2019 at 4:00 p.m. (EDT)
- b. **Responses Received:** None.

- c. Related Documents:
 - i. Notice of Filing Executed Settlement Agreement [ECF No. 1638].
- d. Status: Going forward on final basis.

4. Debtors' Second Omnibus Objection to Claims Asserted Pursuant to 11 U.S.C. § 503(b)(9) (Inconsistent with Debtors' Books and Records) [ECF No. 1489].

- a. Response Deadline: October 24, 2019 at 4:00 p.m. (EDT)
- b. Responses Received: None.
- c. Related Documents: None.
- d. Status: Going forward on final basis. The deadline for Tiffany & Company to respond has been adjourned as there are ongoing settlement discussions between the parties.

5. Debtors' Third Omnibus Objection to Claims Asserted Pursuant to 11 U.S.C. § 503(b)(9) (Inconsistent with Debtors' Books and Records) [ECF No. 1558].

- a. Response Deadline: December 5, 2019 at 4:00 p.m. (EDT)
- b. Responses Received: None.
- c. Related Documents: None.
- d. Status: Going forward on final basis.

6. Debtors' Fourth Omnibus Objection to Claims Asserted Pursuant to 11 U.S.C. § 503(b)(9) (Late Filed Claims) [ECF No. 1559].

- a. Response Deadline: December 5, 2019 at 4:00 p.m. (EDT)
- b. Responses Received: None.
- c. Related Documents: None.
- d. Status: Going forward on final basis.

7. Debtors' Omnibus Objection to Priority Claims [ECF No. 1591].

- a. Response Deadline: December 5, 2019 at 4:00 p.m. (EDT)
- b. Responses Received: None.

- c. Related Documents:
 - i. Ex-Parte Motion to Shorten Time [**ECF No. 1593**].
 - ii. Order Granting Ex-Parte Motion to Shorten Time [**ECF No. 1609**].
 - iii. Stipulation between IRS and Debtors [**ECF No. 1628**].

- d. **Status**: Going forward on final basis. Pursuant to a stipulation the Objection to and the Claim Nos. 187-189, 456-458 have been withdrawn.

8. Debtors' Omnibus Objection to Secured Claims [ECF No. 1592].

- a. Response Deadline: December 5, 2019 at 4:00 p.m. (EDT)

- b. Responses Received: None.

- c. Related Documents:
 - i. Ex-Parte Motion to Shorten Time [**ECF No. 1593**].
 - ii. Order Granting Ex-Parte Motion to Shorten Time [**ECF No. 1609**].

- d. **Status**: Going forward on final basis.

Dated: December 10, 2019

AKERMAN LLP

By: /s/Katherine C. Fackler

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