

**HEARING DATE AND TIME: April 2, 2020 at 10:00 a.m. (Eastern Time)**  
**OBJECTION DEADLINE DATE AND TIME: March 7, 2020 at 4:00 p.m. (Eastern Time)**

John E. Mitchell (Admitted *Pro Hac Vice*)  
Yelena Archiyan (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)
	)	

**SUPPLEMENT TO THIRD INTERIM AND FINAL APPLICATION  
OF AKERMAN LLP, AS COUNSEL TO DEBTORS, FOR ALLOWANCE  
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES, TO INCLUDE  
THE PERIOD FEBRUARY 1, 2020 THROUGH APRIL 2, 2020**

Akerman LLP (“Akerman”) as counsel to Miami Metals I, Inc., and its affiliates and subsidiaries as former debtors and debtors in possession (collectively, the “Debtors”), hereby supplements (this “Supplement”) its Third Interim and Final Application for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Interim

<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), 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).

Period July 1, 2019 through January 31, 2020 and for November 2, 2018 through January 31, 2020 on a Final Basis (the “Final Fee Application”) [ECF No. 1694]. The Final Fee Application is scheduled for hearing on April 2, 2020 at 10:00 a.m. (the “Hearing”). This Supplement covers the period February 1, 2020 through the date of the Hearing (the “Supplemental Compensation Period”). In support of this Supplement, Akerman says:

<b>APPLICANT:</b>	AKERMAN LLP (COUNSEL FOR THE DEBTORS-IN-POSSESSION)
<b>TYPE OF APPLICATION:</b>	SUPPLEMENT TO THIRD INTERIM AND FINAL FEE APPLICATION
<b>SUPPLEMENTAL PERIOD:</b>	FEBRUARY 1, 2020 THROUGH APRIL 2, 2020
<b>SUPPLEMENTAL FEES REQUESTED:</b>	\$28,200.50
<b>SUPPLEMENTAL EXPENSES REQUESTED:</b>	\$1,247.60

**A. Supplemental Fee and Expense Request.**

1. On February 6, 2020, Akerman filed the Final Fee Application, which covers the period ending January 31, 2020. The Final Fee Application is incorporated by reference herein.

2. There were no objections filed to the Final Fee Application. Akerman received informal comments to the Final Fee Application from the Office of the United States Trustee (the “UST”), which have been resolved. The resolution is addressed below.

3. Akerman files this Supplement in support of allowance of its fees and expenses incurred during the Supplemental Compensation Period (the “Supplemental Fee and Expense Request”) on a final basis.

4. The Supplemental Fee and Expense Request includes: (i) fees and expenses actually incurred from February 1, 2020 through March 24, 2020 (the “Actual Supplemental Fees” and “Actual Supplemental Expenses”, respectively), and (ii) estimated fees and expenses incurred from March 24, 2020 through the conclusion of the Hearing (the “Estimated Supplemental Fees” and “Estimated Supplemental Expenses”, respectively).

5. The Actual Supplemental Fees total \$21,200.50 and the Actual Supplemental Expenses total \$747.60.

6. The Estimated Supplemental Fees are estimated to total \$7,000.00 and the Estimated Supplemental Expenses are estimated to total \$500.00.<sup>2</sup>

7. A summary of the total amount of time spent by each Akerman attorney and paraprofessional for this case during the Supplemental Compensation Period (the Actual Supplement Fees) is attached hereto and incorporated herein as **Exhibit A**.

---

<sup>2</sup> To be clear, Akerman will only be paid for fees and expenses actually incurred between March 25, 2020 and the Hearing, however, Akerman is providing the Court and parties-in-interest these estimates for disclosure purposes.

8. A summary of Akerman's Actual Supplement Expenses incurred during the Supplemental Compensation Period, broken down by category, is attached hereto and incorporated herein as **Exhibit B**.

9. Akerman's contemporaneous time records and expense records for the Third Interim Compensation Period will be made available to the Court if the Court would like, or to any interested party upon written request.

10. During the Supplemental Compensation Period, Akerman primarily prepared and filed its Final Fee Application, as well as final fee applications for certain estate professionals, including SSG Advisors LLC and Donlin, Recano & Company, Inc.

11. Akerman also assisted in transitioning the Debtor's assets, books and records, and related information to the Miami Metals Litigation Trustee in furtherance of consummation of the Debtors' confirmed Chapter 11 Plan [ECF No. 1668].

12. The fees sought in Akerman's Supplemental Fee and Expense Request for the services rendered by Akerman were necessary and beneficial to the Debtors and the Debtors' estates and were performed in a timely manner commensurate with the complexity, importance, and nature of the issues involved. Accordingly, approval of the compensation for professional services and reimbursement of expenses sought herein is warranted.

**B. Agreement with United States Trustee.**

13. Akerman and the UST have resolved the UST's informal comments to Akerman's Final Fee Application whereby Akerman will reduce the expenses sought for the Third Interim Compensation period by \$12,750.45, which reduction will be reflected in any order approving the Final Fee Application.

**C. Conclusion.**

14. Akerman has not previously sought the relief requested herein from this or any other court.

**WHEREFORE**, Akerman respectfully requests that this Court enter an order:

- i. approving the allowance and payment of compensation for professional services rendered to the Debtor during the Supplemental Compensation Period in the amount of \$28,200.50 and reimbursement of customary and necessary out-of-pocket expenses in the amount of \$1,247.60, for a total award of \$29,448.10 for the Supplemental Compensation Period; and
- ii. granting such other and further relief as this Court deems just and proper.

Dated: March 30, 2020

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 33131  
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 Former Debtors and Debtors-in-Possession*

## EXHIBIT A

### CUMULATIVE SUMMARY OF HOURLY FEES BY PROFESSIONAL AND PARA-PROFESSIONALS FOR THE PERIOD OF FEBRUARY 1, 2020 THROUGH MARCH 24, 2020

NAME OF PROFESSIONAL	TITLE	YEAR ADMITTED	PRACTICE GROUP	TOTAL HOURS	HOURLY RATE*	TOTALS
FACKLER, MARY K.	PARTNER	2009	BANKRUPTCY & REORGANIZATION	15.20	430.00	\$6,536.00
HARTLEY, ANDREA S.	PARTNER	1990	BANKRUPTCY & REORGANIZATION	11.1	695.00	\$7,714.50
MCKEAN, ESTHER A.	PARTNER	2006	BANKRUPTCY & REORGANIZATION	3.70	485.00	\$1,794.50
MITCHELL, JOHN E.	PARTNER	1996	BANKRUPTCY & REORGANIZATION	.80	695.00	\$556.00
DELPINO, REYKO E.	PARALEGAL	N/A	BANKRUPTCY & REORGANIZATION	6.80	365.00	\$2,482.00
MEEHAN, JENNIFER S.	PARALEGAL	N/A	BANKRUPTCY & REORGANIZATION	7.70	275.00	\$2,117.50
<b>SUB-TOTAL FEES INCURRED:</b>				<b>45.30</b>		<b>\$21,200.50</b>
<b>LESS 50% DISCOUNT NON-WORKING TRAVEL:</b>						<b>(\$0)</b>
<b>TOTAL FEES INCURRED:</b>						<b>\$21,200.50</b>
<b>TOTAL HOURS:</b>				<b>45.30</b>		
<b>BLENDED HOURLY RATE:</b>					<b>\$468.00</b>	

**CUMULATIVE SUMMARY OF TOTAL FEES BY TASK CATEGORY  
FOR THE PERIOD OF FEBRUARY 1, 2020 THROUGH MARCH 24, 2020**

<b>CATEGORY TASK CODE</b>	<b>TOTAL HOURS</b>	<b>TOTALS FEES</b>
B110 – CASE ADMINISTRATION	2.60	\$1,337.50
B120 – ASSET ANALYSIS AND RECOVERY	0	0
B130 – ASSET DISPOSITION	0	0
B140 – RELIEF FROM STAY/ADEQUATE PROTECTION PROCEEDINGS	0	0
B150 – MEETINGS OF AND COMMUNICATION WITH CREDITORS	0	0
B160 – FEE/EMPLOYMENT APPLICATIONS	39.00	\$17,879.50
B180 – AVOIDANCE ACTION ANALYSIS	0.90	\$436.50
B185 – ASSUMPTION/REJECTION OF LEASES AND CONTRACTS	0	0
B190 – OTHER CONTESTED MATTERS	0.30	\$208.50
B195 – NON-WORKING TRAVEL	0	0
B210 – BUSINESS OPERATIONS	0	0
B220 – EMPLOYEE BENEFITS/PENSIONS	0	0
B230 – FINANCING/CASH COLLECTIONS	0	0
B240 – TAX ISSUES	0	0
B310 – CLAIMS ADMINISTRATION AND OBJECTIONS	0	0
B320 - PLAN AND DISCLOSURE STATEMENT (INCLUDING BUSINESS PLAN)	0.50	\$347.50
B410 – GENERAL BANKRUPTCY ADVICE	0.30	\$145.50
B420 - RESTRUCTURINGS	0	0
B600 - INVESTIGATIONS	0	0
B610 - UCC INVESTIGATION / 2004 EXAM	0	0
B700 – ENVIRONMENTAL	0	0
B710 – MEXICO/RTMM	.50	\$347.50
B720 – OWNERSHIP DISPUTES	.80	\$388.00
B730 – RECLAMATION CLAIMS	0	0
B802 – DONDE APPEAL	0.40	\$110.00
	0	0
<b>SUB-TOTALS:</b>	<b>45.3</b>	<b>\$21,200.50</b>
<b>LESS 50% DISCOUNT NON-WORKING TRAVEL:</b>		<b>(\$0)</b>
<b>TOTALS:</b>		<b>\$21,200.50</b>



## **EXHIBIT B**

### **CUMULATIVE SUMMARY OF EXPENSES BY CATEGORY FOR THE PERIOD FEBRUARY 1, 2020 THROUGH MARCH 24, 2020**

<b>DESCRIPTION</b>	<b>TOTAL</b>
<b><u>Duplicating:</u></b> Color Copying/Printing: Photocopy: \$.40	\$.40
<b><u>Delivery Service:</u></b> FedEx: \$418.70 Messenger (local):	\$418.70
<b><u>Computerized Research:</u></b> Pacer: \$10.90 Westlaw: Lexis Advance Research:	\$10.90
<b><u>Travel Expenses:</u></b>	
Travel Expense: Airfare and Baggage Fees:	
Travel Expense: Hotel	
Travel Expense: Parking	
Travel Expense: Meals	
<b><u>Postage:</u></b>	\$5.10
<b><u>Telephone/Conference Calls:</u></b> Conferencing: \$16.43 Long Distance Calls:	\$16.43
<b><u>Court Reporter Fees:</u></b>	
<b><u>Court Fees:</u></b> Filing Fees: \$296.07 Court Services:	\$296.07
<b>TOTALS:</b>	<b>\$747.60</b>