

**IN THE UNITED STATES  
BANKRUPTCY COURT  
FOR THE WESTERN  
DISTRICT OF  
PENNSYLVANIA**  
In Re:  
THE INTERNATIONAL METALS  
RECLAMATION COMPANY,  
LLC,  
Debtor.  
Bankruptcy Case No.  
24-20226-CMB  
Chapter 7  
Document No.  
Hearing Date & Time:  
July 9, 2024 @ 1:30 p.m.  
CHARLES O. ZEBLEY, JR.,  
v.  
Trustee/Movant,  
Response Deadline: June 28,  
2024  
THE INTERNATIONAL METALS  
RECLAMATION COMPANY,  
LLC;  
J.T. THORPE & SON, INC.,  
Respondents.

**NOTICE OF SALE FREE AND  
CLEAR OF ALL LIENS,  
CLAIMS AND  
ENCUMBRANCES  
TO: ALL PARTIES IN  
INTEREST**

**NOTICE IS HEREBY GIVEN**  
THAT Charles O. Zebley, Jr., the  
Chapter 7 Trustee of The  
International Metals  
Reclamation Company, LLC  
(the **Trustee**), has filed an  
Emergency Motion for Entry of  
an Order: (i) Approving Bid  
Procedures for Sale of  
Substantially all Assets Free  
and Clear of Liens, Claims,  
Interests, and Encumbrances  
Pursuant to 11 U.S.C. § 363  
and (ii) Form and Manner of  
Notice of Sale (the **Bid  
Procedures Motion**). On May  
28, 2024, the Bankruptcy  
Court entered an Order (**Bid  
Procedures Order**) approving  
certain bid procedures that  
will govern the sale of the  
Debtor's assets (the **Bid  
Procedures**). Further, On May  
22, 2024, the Trustee filed a  
Motion for an Order  
Authorizing the Sale of  
Substantially all of the  
Debtor's Assets Free and  
Clear of All Liens, Claims,  
Interests and Encumbrances  
(the **Sale Motion**)

**Assets To Be Sold**  
The Trustee intends to sell to  
the party that submits the  
highest and best offer (a  
**Successful Bidder**) for  
substantially all of the Debtor's  
assets, which include, but are  
not limited to: the Debtor's  
real property, furniture,  
fixtures and equipment,  
intellectual property, rights to  
certain permits, inventory,  
goodwill and general  
intangibles, and other tangible  
personal property (the  
**Debtors Assets**). Bids may be  
made for all of the Debtor's  
Assets. Pursuant to section  
363 of the Bankruptcy Code  
and in accordance with the  
Bid Procedures, the Trustee  
intends to sell the Debtor's  
Assets free and clear of all  
liens, claims, encumbrances,  
and interests and the Debtor's  
Assets will be sold on an **As  
Is, Where Is** basis. The  
Trustee proposes to sell the  
Debtor's Assets to Moxba B.V.  
(the **talking Horse Bidder**) in  
accordance with the terms  
and conditions set forth in the  
asset purchase agreement  
attached to the Sale Motion  
(the **Stalking Horse APA**),  
with such modifications to the  
Stalking Horse APA as made  
by the Successful Bidder(s).  
Any potential bidder may  
obtain a detailed description  
of the Debtor's Assets from  
the undersigned.

**Sale Free and Clear of  
Liens, Claims,  
Encumbrances and  
Interests**  
Pursuant to section 363(b) and  
(f) of the United States Code,  
11 U.S.C. §§ 101, et seq. (the  
"Bankruptcy Code"), and  
subject to any orders entered  
by the Court, the Debtor will  
seek authority to sell all rights,  
title, and interest in the  
Debtors' Assets to a  
Successful Bidder submitting  
the highest and best  
Qualifying Bid(s) (as that term  
is defined in the Bid  
Procedures Order and Bid  
Procedures) for the Debtors'  
Assets in accordance with the  
Bid Procedures, free and clear  
of any liens, claims,  
encumbrances, and interests,  
with all such liens, claims,  
encumbrances, and interests  
attaching to the proceeds of  
such sale.

**Key Dates**  
June 17, 2024 at 4:00 p.m.  
(prevailing Eastern Time) Bid  
Deadline  
June 28, 2024 Sale Objection  
Deadline  
June 21, 2024 at 4:00 P.M.  
(prevailing Eastern Time)  
Determination of Qualified  
Bidder(s) (as set forth in  
Section IV of the Bid  
Procedures), date may be  
modified by the Trustee if  
needed  
June 26, 2024 at 10:00 a.m.  
(prevailing Eastern Time)  
Auction  
May be Made at Time of Sale  
Hearing Auction Objection  
Deadline (solely related to  
events at the Auction)  
July 9, 2024 at 1:30 p.m.  
(prevailing Eastern Time) Sale  
Hearing

**Auction and Bidding  
Procedures**  
In the event the Trustee  
receives more than one  
Qualified Bid, the Debtor will  
conduct an auction (the  
Auction) for all of the Debtor's  
Assets on **June 26, 2024 at  
10:00 a.m. (prevailing  
Eastern Time)** at the  
Pittsburgh law offices of Leech  
Tishman Fuscaldo & Lampl,  
LLC, 525 William Penn Place,  
28th Floor, Pittsburgh,  
Pennsylvania 15219, or such  
other date or location as  
designated prior to the  
Auction. Only parties  
submitting Qualified Bids (as  
that term is defined in the Bid  
Procedures) will be invited to  
participate in the Auction. The  
Bid Procedures, which are  
available upon request by  
contacting the undersigned,  
set forth the process by which  
the Trustee seeks to conduct  
the Auction. Participating  
bidders at the Auction will  
include the Stalking Horse  
Bidder and any potential  
purchaser that satisfies the  
requirements set forth in the  
Bidding Procedures.

**The Sale Hearing**  
The Bankruptcy Court will hold  
a hearing (the **Sale Hearing**)  
on the Sale Motion on **July 9,  
2024 at 1:30 p.m. (prevailing  
Eastern Time)** before the  
Honorable Carlotta Bohm,  
United States Bankruptcy  
Judge, at the United States  
Bankruptcy Court for the  
Western District of  
Pennsylvania, Courtroom B,  
54th Floor, U.S. Steel Tower,  
600 Grant Street, Pittsburgh,  
15219, Courtroom B and via  
the Zoom video conference  
platform using the link  
**[https://www.zoomgov.com  
/j/16143800191](https://www.zoomgov.com/j/16143800191)**. At the Sale  
Hearing, the Trustee will seek  
approval of the proposed sale  
of the Debtor's Assets. The  
Sale Hearing may be  
adjourned from time to time  
without further notice to  
creditors or parties-in-interest  
other than by announcement  
of said adjournment in the  
Bankruptcy Court or on the  
Bankruptcy Court's calendar  
on the date scheduled for the  
Sale Hearing. Objections, if  
any, to the Sale must be filed  
with the Court and served  
upon parties in interest so as  
to be received no later than  
**June 28, 2024**. If you seek to  
object to the sale on any  
grounds, you must comply  
with the terms for making  
such objections as set forth in  
the Bid Procedures Order and  
Bid Procedures. Such  
Objection must be filed with  
the Bankruptcy Court and  
served on the parties set forth  
in the Bid Procedures Order  
and Bid Procedures. If any  
party fails to timely file and  
serve an objection in  
accordance with the Bid  
Procedures Order and the Bid  
Procedures, the Bankruptcy  
Court may disregard such  
objection. Complete copies of  
the Bid Procedures, Sale  
Motion, and/or Stalking Horse  
APA may be obtained by  
contacting counsel for the  
Trustee below. More  
information regarding the sale  
can be found on the Court's  
Electronic Access to Sales  
Information Website at  
**[http://www.pawb.uscourts.  
gov/cgi-bin/csoai.cgi](http://www.pawb.uscourts.gov/cgi-bin/csoai.cgi)**

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