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Honorable Christopher M. Alston
Chapter 11
Hearing Location: Seattle, Rm. 7206
Hearing Date: Friday, May 6, 2016
Hearing Time: 9:30 a.m.
Response Date: May 2, 2016

8 UNITED STATES BANKRUPTCY COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 In re:
12 NORTHWEST TERRITORIAL MINT, LLC,
13 Debtor.

Case No. 16-11767-CMA

DECLARATION OF MICHAEL J.
GEARIN IN SUPPORT OF MOTION
FOR ORDER ESTABLISHING
PROCEDURES FOR INTERIM
PAYMENT OF FEES AND COSTS TO
PROFESSIONALS

15 I, Michael J. Gearin, hereby declare:

- 16 1. I am an attorney at law admitted to practice before this Court and am a partner in the
17 law firm K&L Gates LLP, with an office at 925 Fourth Avenue, Suite 2900, Seattle, Washington
18 98104. I have personal knowledge of the facts set forth herein, and I am competent to testify to the
19 same.
- 20 2. Mark Calvert, the Chapter 11 Trustee (the "Trustee") has requested an order allowing
21 him to employ various professionals ("Professionals"), to assist it in the course of these bankruptcy
22 proceedings.
- 23 3. Because of the complex nature of this case, the Trustee and each of the Professionals
24 will likely be required to devote substantial time and energy to the bankruptcy proceedings and may
25 be required to forgo other work that would pay on a monthly basis.

26 DECLARATION IN SUPPORT OF MOTION
FOR ORDER ESTABLISHING PROCEDURES FOR
INTERIM PAYMENT OF FEES AND COSTS TO
PROFESSIONALS - 1

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1 4. Forcing the Trustee and each of the Professionals to wait a protracted period of time
2 for payment may work an undue hardship on the Trustee and each of the Professionals to varying
3 degrees.

4 5. K&L Gates LLP, on behalf of the Trustee and each of the Professionals, requests that
5 the Trustee and each of the Professionals be authorized to obtain reimbursement for their costs and
6 payment of 80% of their fees on a monthly basis. If the motion is approved by the Court, the Trustee
7 and each Professional would be authorized to receive reimbursement for its costs and payment for
8 80% of its fees seven days after sending a billing statement to the Trustee, counsel for the Trustee,
9 counsel for the U.S. Trustee, the Creditors Committee and its counsel, and parties requesting special
10 notice, (each, a “Notified Party”); provided, however, that in the event that a Notified Party objects,
11 the Trustee or any Professional will be authorized to seek an order approving payment of its fees and
12 costs on ten days’ notice to the Notified Parties.

13 6. The Trustee and each Professional would submit a fee application to the Court
14 periodically in accordance with section 331 of the Code.

15 7. I declare under penalty of perjury under the laws of the state of Washington that the
16 foregoing information is true and correct.

17 DATED: this 22nd day of April, 2016.
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20 By /s/ Michael J. Gearin
Michael J. Gearin

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DECLARATION IN SUPPORT OF MOTION
FOR ORDER ESTABLISHING PROCEDURES FOR
INTERIM PAYMENT OF FEES AND COSTS TO
PROFESSIONALS - 2

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