1	David C. Neu, wSBA # 33143	Honorable Christopher M. Alston Chapter 11	
2	Brian T. Peterson, WSBA # 42088 K&L GATES LLP	Ex Parte	
3	Seattle, WA 98104-1158		
4			
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6			
7	UNITED STATES BANKRUPTCY COURT		
8	WESTERN DISTRICT OF WASHINGTON AT SEATTLE		
9	In re:	Case No. 16-11767-CMA	
10	NORTHWEST TERRITORIAL MINT, LLC,	EX PARTE MOTION FOR	
11	NORTHWEST TERRITORIAL WINT, EEC,	EXAMINATION OF ROSS B. HANSEN	
12		PURSUANT TO RULE 2004 AND SUBPOENAS PURSUANT TO	
13		RULE 9016	
14			
15	Mark Calvert, Trustee for the Northwest Territorial Mint, LLC ("NWTM"), in the above-		
16	captioned proceeding, by and through his attorneys, K&L Gates, LLP, moves the Court for entry of		
17	an ex parte order for examination of Ross B. Hansen pursuant to Federal Rules of Bankruptcy		
18	Procedure 2004(b) and (c) and authority to serve subpoenas pursuant to Federal Rule of Bankruptcy		
19	Procedure 9016 to certain third parties.		
20	1. On April 1, 2016, NWTM filed a v	voluntary petition for relief under Chapter 11 of the	
21	United States Bankruptcy Code.		
22	2. On April 11, 2016, Mark Calvert (the "Trustee") was appointed as the Chapter 11	
23	Trustee of NWTM.		
24	3. Since his appointment, the Trustee	has been working to stabilize and maintain the	
25	business operations of NWTM, as well as to invest	stigate the assets and liabilities of the estate.	
26			
	<i>EX PARTE</i> MOTION FOR SUBPOENA PURSUANT TO RULES 2004 AND 9016 - 1 K:\2070561\00001\20347_DCN\20347P28HA	K&L GATES LLP 925 FOURTH AVENUE, SUITE 2900 SEATTLE, WASHINGTON 98104-1158 TELEPHONE: (206) 623-7580 FACSIMILE: (206) 623-7022	

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4. Ross B. Hansen is the sole member of NWTM, and on information and belief, has maintained exclusive control and authority over its business operations from the time of its founding until the appointment of the Trustee. The Trustee believes that assets belonging to NWTM may have been transferred to Mr. Hansen or other entities in which Mr. Hansen holds an interest.

5. The Trustee deems it essential to examine Mr. Hansen and records and documents in his possession, custody or control as described in <u>Exhibit A</u> pursuant to Bankruptcy Rule 2004, relating to the acts, conduct, or property, to the liabilities and financial condition of NWTM, and to matters which may affect the administration of NWTM's estate.

6. In order to ensure that he obtains complete records, the Trustee also seeks authority to issue subpoenas pursuant to Rule 9016 to any third party that he identifies which may hold the records and documents described in Exhibit A.

7. In addition, the Trustee seeks an order that Mr. Hansen appear for oral examination to give testimony regarding (i) the acts and conduct of NWTM and its affiliates, (ii) the acts and conducts of Mr. Hansen and any other party in control of NWTM, (iii) the property and liability of NWTM's estate, (iv) any other matter which may affect the administration of NWTM's estate.

WHEREFORE, the Trustee respectfully requests that the court enter an order in substantially the form filed concurrently herewith.

DATED this 25th day of April, 2016.

K&L GATES LLP

By /s/ Michael J. Gearin

Michael J. Gearin, wSBA #20982 David C. Neu, wSBA #33143 Brian T. Peterson, wSBA #42088 Attorneys for Mark Calvert, Chapter 11 Trustee

EX PARTE MOTION FOR SUBPOENA PURSUANT TO RULES 2004 AND 9016 - 2 K:\2070561\00001\20347_DCN\20347P28HA

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1	EXHIBIT A		
2	DOCUMENTS TO BE PRODUCED		
3	1.	Monthly account statements for all bank accounts or investment accounts in which	
4	Ross B. Hansen holds an interest.		
5	2.	Monthly account statement for all credit cards in which Ross B. Hansen holds an	
6	interest.		
7	3.	All business records of Northwest Territorial Mint, LLC.	
8	4.	All business records of Medallic Art Company, Ltd.	
9	5.	All business records of Medallic Art Company, LP.	
10	6.	All business records of Medallic Art Company, LLC.	
11	7.	All documents referring-to, related-to, or evidencing precious metals acquired by	
12	Ross B. Hansen from 2010 to the present.		
13	8.	All documents referring-to, related-to, or evidencing any items of personal property	
14	with a value in excess of \$10,000 acquired by Ross B. Hansen from 2010 to the present.		
15	9.	All documents referring-to, related-to, or evidencing any real property acquired by	
16	Ross B. Hansen from 2010 to the present.		
17	10.	Copies of all Federal and State tax returns filed by Ross B. Hansen from 2010 to the	
18	present.		
19	11.	All documents referring-to, related-to, or evidencing any compensation paid to Ross	
20	B. Hansen by Northwest Territorial Mint, LLC or Medallic Art Company, LLC.		
21	12.	All documents referring-to, related-to, or evidencing any transfer of assets from	
22	Northwest Territorial Mint, LLC to Ross B. Hansen or Diane Erdmann.		
23	13.	All documents referring-to, related-to, or evidencing any property of Northwest	
24	Territorial M	lint, LLC held by Ross B. Hansen.	
25			
26			
	EX PARTE MOTION FOR SUBPOENA K&L GATES LLP PURSUANT TO RULES 2004 AND 9016 - 3 925 FOURTH AVENUE, SUITE 2900 K:2070561\00001\20347_DCN\20347P28HA SEATTLE, WASHINGTON 98104-1158 Case 16-11767-CMA Doc 109 Filed 04/25/16 Ent. 04/25/16 15:39:02 Pg. 3 of 5		

1	14. All documents referring-to, related-to, or evidencing any payments made to		
2	Northwest Territorial Mint, LLC for the purpose of purchasing precious metals, from October, 2015		
3	to the present.		
4	15. All documents referring-to, related-to, or evidencing any property owned by Ross B.		
5	Hansen or Diane Erdmann held by Northwest Territorial Mint, LLC.		
6	16. All documents referring-to, related-to, or evidencing any transfer of personal		
7	property, including but not limited to precious metals or coins, from facilities owned by Northwest		
8	Territorial Mint, LLC to any other location, during the period of March 1, 2016 to April 1, 2016.		
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1	CERTIFICATE OF SERVICE		
2	The undersigned declares as follows:		
3 4	That she is a paralegal in the law firm of K&L Gates LLP, and on April 25, 2016, she caused the foregoing document to be filed electronically through the CM/ECF system which caused Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic Filing.		
5	I declare under penalty of perjury under the laws of the State of Washington and the		
6			
7	Executed on the 25th day of April, 2016 at Seattle, Washington.		
8	/s/ Denise A. Evans Denise A. Evans		
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