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Honorable Christopher M. Alston
Chapter 11
Ex Parte

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6
7 UNITED STATES BANKRUPTCY COURT
8 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 In re:
10 NORTHWEST TERRITORIAL MINT, LLC,

Case No. 16-11767-CMA

11 *EX PARTE* MOTION FOR
12 EXAMINATION OF ROSS B. HANSEN
13 PURSUANT TO RULE 2004 AND
14 SUBPOENAS PURSUANT TO
RULE 9016

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 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 investigate the assets and liabilities of the estate.
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EX PARTE MOTION FOR SUBPOENA
PURSUANT TO RULES 2004 AND 9016 - 1

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EXHIBIT A

DOCUMENTS TO BE PRODUCED

1. Monthly account statements for all bank accounts or investment accounts in which Ross B. Hansen holds an interest.
2. Monthly account statement for all credit cards in which Ross B. Hansen holds an interest.
3. All business records of Northwest Territorial Mint, LLC.
4. All business records of Medallic Art Company, Ltd.
5. All business records of Medallic Art Company, LP.
6. All business records of Medallic Art Company, LLC.
7. All documents referring-to, related-to, or evidencing precious metals acquired by Ross B. Hansen from 2010 to the present.
8. All documents referring-to, related-to, or evidencing any items of personal property with a value in excess of \$10,000 acquired by Ross B. Hansen from 2010 to the present.
9. All documents referring-to, related-to, or evidencing any real property acquired by Ross B. Hansen from 2010 to the present.
10. Copies of all Federal and State tax returns filed by Ross B. Hansen from 2010 to the present.
11. All documents referring-to, related-to, or evidencing any compensation paid to Ross B. Hansen by Northwest Territorial Mint, LLC or Medallic Art Company, LLC.
12. All documents referring-to, related-to, or evidencing any transfer of assets from Northwest Territorial Mint, LLC to Ross B. Hansen or Diane Erdmann.
13. All documents referring-to, related-to, or evidencing any property of Northwest Territorial Mint, LLC held by Ross B. Hansen.

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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CERTIFICATE OF SERVICE

The undersigned declares as follows:

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.

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

Executed on the 25th day of April, 2016 at Seattle, Washington.

/s/ Denise A. Evans
Denise A. Evans