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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 DIANE ERDMANN
13 PURSUANT TO RULE 2004 AND
SUBPOENAS PURSUANT TO
RULE 9016

14 Mark Calvert, Trustee for the Northwest Territorial Mint, LLC (“NWTM”), in the above-
15 captioned proceeding, by and through his attorneys, K&L Gates, LLP, moves the Court for entry of
16 an *ex parte* order for examination of Diane Erdmann pursuant to Federal Rules of Bankruptcy
17 Procedure 2004(b) and (c) and authority to serve subpoenas pursuant to Federal Rule of Bankruptcy
18 Procedure 9016 to certain third parties.

19 1. On April 1, 2016, NWTM filed a voluntary petition for relief under Chapter 11 of the
20 United States Bankruptcy Code.

21 2. On April 11, 2016, Mark Calvert (the “Trustee”) was appointed as the Chapter 11
22 Trustee of NWTM.

23 3. Since his appointment, the Trustee has been working to stabilize and maintain the
24 business operations of NWTM, as well as to investigate the assets and liabilities of the estate.

25 4. Ross B. Hansen is the sole member of NWTM, and on information and belief, has
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EX PARTE MOTION FOR SUBPOENA
PURSUANT TO RULES 2004 AND 9016 - 1

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1 maintained exclusive control and authority over its business operations from the time of its founding
2 until the appointment of the Trustee.

3 5. On information and belief, Diane Erdmann and Ross Hansen have lived together for
4 over a decade and are involved in a meretricious relationship.

5 6. The Trustee believes that assets belonging to NWTM may have been transferred to
6 Mr. Hansen or Ms. Erdmann or other entities in which Mr. Hansen holds an interest.

7 5. The Trustee deems it essential to examine Ms. Erdmann and records and documents
8 in her possession, custody or control as described in Exhibit A pursuant to Bankruptcy Rule 2004,
9 relating to the acts, conduct, or property, to the liabilities and financial condition of NWTM, and to
10 matters which may affect the administration of NWTM's estate.

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

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

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

21 DATED this 25th day of April, 2016.

22 K&L GATES LLP

23
24 By /s/ Michael J. Gearin

Michael J. Gearin, WSBA #20982

David C. Neu, WSBA #33143

Brian T. Peterson, WSBA #42088

25 Attorneys for Mark Calvert, Chapter 11 Trustee
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EX PARTE MOTION FOR SUBPOENA
PURSUANT TO RULES 2004 AND 9016 - 2

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EXHIBIT A
DOCUMENTS TO BE PRODUCED

1. Monthly account statements for all bank accounts or investment accounts in which Diane Erdmann holds an interest.
2. Monthly account statement for all credit cards in which Diane Erdmann 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 Diane Erdmann 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 Diane Erdmann from 2010 to the present.
9. All documents referring-to, related-to, or evidencing any real property acquired by Diane Erdmann from 2010 to the present.
10. Copies of all Federal and State tax returns filed by Diane Erdmann from 2010 to the present.
11. All documents referring-to, related-to, or evidencing any compensation paid to Diane Erdmann 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 or Diane Erdmann.

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 transfer of personal
5 property, including but not limited to precious metals or coins, from facilities owned by Northwest
6 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.

Also on April 25, 2016, she caused to be deposited in the mail of the United States of America, by first class postage prepaid, addressed envelopes containing copies of the foregoing document and mailed to the following addresses:

Diane Erdmann P.O. Box 4024 Federal Way, WA 98063	
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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