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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
EXAMINATION OF MEDALLIC ART
12 COMPANY, LLC PURSUANT TO
RULE 2004 AND SUBPOENAS
13 PURSUANT TO 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 Medallic Art Company, LLC (“Medallic”) pursuant to Federal
18 Rules of Bankruptcy Procedure 2004(b) and (c) and authority to serve subpoenas pursuant to Federal
19 Rule of Bankruptcy 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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1 4. Ross B. Hansen is the sole member of NWTM, and on information and belief, has
2 maintained exclusive control and authority over its business operations from the time of its founding
3 until the appointment of the Trustee.

4 5. Ross B. Hansen is a member of Medallic, and, on information and belief, controls
5 Medallic through a wholly-owned corporation. On its website, Medallic describes itself as “a
6 division of [NWTM].”

7 6. Ross B. Hansen has alleged that he believes potential assets of NWTM’s estate are, in
8 fact, owned by Medallic.

9 7. The Trustee believes that assets belonging to NWTM may have been transferred to
10 Mr. Hansen or other entities in which Mr. Hansen holds an interest, including Medallic.

11 8. The Trustee deems it essential to examine Medallic and records and documents in its
12 possession, custody or control as described in Exhibit A pursuant to Bankruptcy Rule 2004, relating
13 to the acts, conduct, or property, to the liabilities and financial condition of NWTM, and to matters
14 which may affect the administration of NWTM’s estate including the relationship between NWTM
15 and Medallic.

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

19 10. In addition, the Trustee seeks an order that a representative of Medallic appear for
20 oral examination to give testimony regarding (i) the acts and conduct of Medallic and its affiliates,
21 (ii) the relationship between Medallic and NWTM, and (iii) any other matter which may affect the
22 administration of NWTM’s estate.

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

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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

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EXHIBIT A

DOCUMENTS TO BE PRODUCED

1. Monthly account statements for all bank accounts or investment accounts in which Medallic Art Company, LLC holds an interest.
2. Monthly account statement for all credit cards in which Medallic Art Company, LLC holds an interest.
3. All business records of Medallic Art Company, LLC, including, but not limited to formation documents, limited liability company agreements, payroll records, balance sheets, and accounting records.
4. All documents referring-to, related-to, or evidencing agreements between Medallic Art Company, LLC and any of the following persons or entities:
 - a. Ross B. Hansen
 - b. Northwest Territorial Mint
 - c. Diane Edrmann
 - d. Medallic Art Company, Ltd.
 - e. Medallic Art Company, LP
5. All documents referring-to, related-to, or evidencing Medallic Art Company, LLC's interest or ownership of equipment or inventory used by Northwest Territorial Mint, LLC.
6. All documents referring-to, related-to, or evidencing Medallic Art Company, LLC's interest or ownership of precious metals used or stored by Northwest Territorial Mint, LLC.
7. Copies of all Federal and State tax returns filed by Medallic Art Company, LLC, from 2010 to the present.

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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:

Medallic Art Company LLC c/o Ross Hansen 80 Airpark Vista Blvd Dayton, NV 89403	
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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