

Honorable Christopher M. Alston
Chapter 11
Date of Hearing: January 12, 2018
Time of Hearing: 9:30 a.m.

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NORTHWEST TERRITORIAL MINT, LLC,

Debtor.

No. 16-11767-CMA

REPLY DECLARATION OF DIANE
ERDMANN IN SUPPORT OF MOTION
TO COMPEL ABANDONMENT

Diane Erdmann, being first duly sworn upon oath deposes and states:

1. I am over eighteen years old and state the following based upon my personal knowledge and in support of my motion to compel abandonment.
2. The inventory of items I have previously identified are my property.
3. The items I have previously identified were removed from my safe. I am attaching as Exhibit "A" hereto a copy of my personal check used to purchase the safe in May 2011. I do so for purposes of verifying the safe was mine; as well as its contents removed by the King County Sheriff when executing a writ against Ross Hansen.
4. I was compelled by the Sheriff to open the safe under threat that it would be seized and then destroyed (by locksmith) to open it in order to obtain its contents. I opened the safe as a result on demand.

REPLY DECLARATION OF DIANE ERDMANN– Page 1

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- 1 5. At the time, the Sheriff was requested to do a separate and distinct inventory for the
2 contents of the safe, which was rudely declined.
- 3 6. Since my property was removed, I have consistently informed and asserted ownership.
4 In this bankruptcy, the matter was brought to the attention of the Bankruptcy Court,
5 which entered its *Order Determining Applicability of Automatic Stay* on June 22,
6 2016.
- 7 7. Although not specifically directed in that order, I understood that the Trustee was
8 obligated to initiate proceedings to assert any claim the estate may have in my
9 property or return my seized property to the Sheriff (at which time the summary
10 statutory procedures available to me under state law for release would apply). I was of
11 the belief that the Bankruptcy Court did not have jurisdiction to determine my rights in
12 the seized assets, but was limited to determining the estate's rights to the sized
13 property only.

14 I declare under penalty of perjury under the laws of the United States of America that
15 the aforementioned is true and correct.

16 Executed this 9th day of January, 2018 at Federal Way, Washington.

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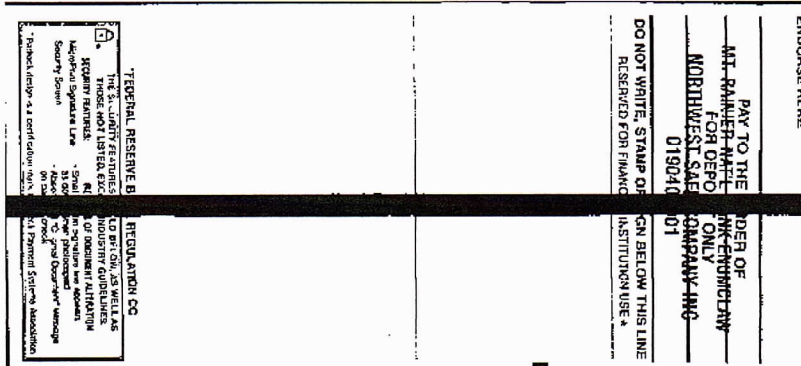
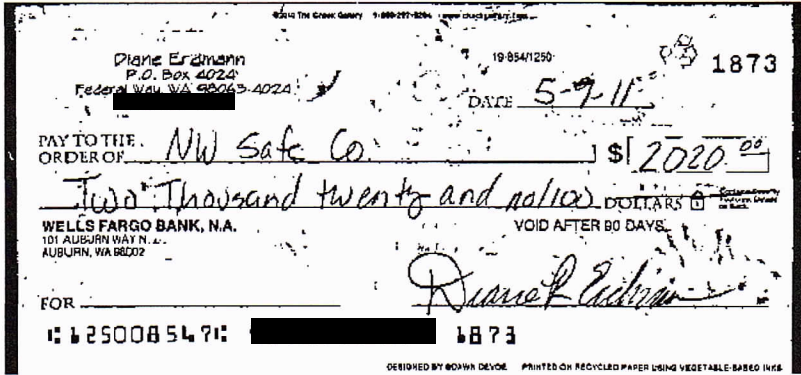
19 Diane Erdmann



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View Check Copy

| | | | |
|--------------|-------------|--------------|---|
| Check Number | Date Posted | Check Amount | Account Number |
| 1873 | 05/12/11 | \$2,020.00 | WELLS FARGO ESSENTIAL CHECKING XXXXXX8807 |



Equal Housing Lender

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EXHIBIT "A"