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UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

In re:  
  
NORTHWEST TERRITORIAL MINT, LLC,  
  
Debtor.

Case No. 16-11767-CMA  
  
DECLARATION OF PAUL WAGNER  
IN SUPPORT OF TRUSTEE'S  
MOTION FOR ORDER  
AUTHORIZING THE AUCTION AND  
SALE OF THE DEBTOR'S  
EQUIPMENT, DIES, TOOLING,  
ARCHIVES, AND INVENTORY FREE  
AND CLEAR OF ALL LIENS,  
CLAIMS, INTERESTS, AND  
ENCUMBRANCES

I, Paul Wagner, hereby declare:

1. I am the Chief Information Officer of Northwest Territorial Mint, LLC ("NWTM" or "Debtor"). I submit this declaration in support of the Trustee's Motion for Order Authorizing the Auction and Sale of the Debtor's Equipment, Dies, Tooling, Archives, and Inventory Free and Clear of All Liens, Claims, Interests, and Encumbrances (Dkt. No. 1350). I have been employed by the Debtor for approximately five years. I am over the age of eighteen and I am competent in all ways to testify. Unless otherwise stated herein, I make the following statements based upon my personal knowledge.

DECLARATION OF PAUL WAGNER IN  
SUPPORT OF TRUSTEE'S MOTION FOR  
AUTHORIZING AUCTION - 1

501023025 v2

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SUITE 2900  
SEATTLE, WASHINGTON 98104-1158  
TELEPHONE: (206) 623-7580  
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1           2.       The Debtor’s business was primarily comprised of (a) the sale of precious metals,  
2 such as gold, silver and platinum; and (b) the minting of medallions, coins, and other awards under  
3 both the Northwest Territorial Mint and the Medallic Art Company name. The Debtor, including  
4 through the substantive consolidation of assets of Medallic Art Company owns and possesses  
5 thousands of dies used by the Debtor to produce custom-made products (the “Coining Die(s)”).

6           3.       The Coining Dies are part of the Debtor’s tooling, which is property of the Debtor  
7 and not property of individual customers. While customers may have paid for the tooling to make  
8 the die, that did not confer ownership of the die on the customer. The customer may have retained  
9 the rights to use certain imagery, but the dies remain property of the company. Set forth below, is a  
10 true a correct copy of what the Debtor’s custom minting website indicates with respect to Coining  
11 Dies. This website language was in place before the filing of the bankruptcy case and the  
12 appointment of the Trustee and has remained on the website to the current date.

## Dies



15 Two hardened steel dies, each engraved with a  
16 unique design, are used to strike your custom  
17 medallion. These dies can either be rendered with  
18 two dimensional or three dimensional engraving,  
19 depending on the complexity of your design and  
20 the look you want for your finished coin.  
21 Corporate logos or slogans can often best be  
22 replicated using a two-dimensional die. Portraits,  
23 landscapes, and other highly detailed imagery  
24 typically require use of a three-dimensional die.



19 When the dies are ready, we turn our attention to the process of creating blanks. This usually  
20 starts with the [melt](#).

21 [We store each customer die domestically](#), protecting our customer’s designs as well.

22 Would you like more information on the types of minted items available from Northwest Territorial  
23 Mint? Request a [FREE information packet](#) with detailed information about custom coins and other  
24 minted products.

25 *NWTM is a permanent repository of all custom dies for its customers’ future use for the lifetime of the company. NWTM  
26 retains copyright rights to all artwork it creates, and also retains possession and ownership of all dies it creates for its  
customers. All dies are stored at NWTM’s facilities and are placed within our Die Library. However, NWTM will not use  
its customers’ dies or artwork without express written permission of its customers or for future customer orders.*

DECLARATION OF PAUL WAGNER IN  
SUPPORT OF TRUSTEE’S MOTION FOR  
AUTHORIZING AUCTION - 2

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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 February 7, 2018, 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 7th day of February, 2018 at Seattle, Washington.

/s/ Denise A. Lentz  
Denise A. Lentz

DECLARATION OF PAUL WAGNER IN  
SUPPORT OF TRUSTEE'S MOTION FOR  
AUTHORIZING AUCTION - 4

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