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Honorable Christopher M. Alston
Chapter 11
Hearing Location: Rm. 7206
Hearing Date: Friday, February 9, 2018
Hearing Time: 9:30 a.m.
Response Date: February 5, 2018

5
6
7 UNITED STATES BANKRUPTCY COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 In re:
11 NORTHWEST TERRITORIAL MINT, LLC,
12 Debtor.

Case No. 16-11767-CMA
TRUSTEE'S STATEMENT REGARDING
ORDER ON HOFF'S MOTION FOR RELIEF
FROM STAY

13
14 Mark Calvert (the "Trustee"), Chapter 11 Trustee for Northwest Territorial Mint, LLC
15 ("NWTM" or the "Debtor") submits his statement regarding the status of the parties discussions over
16 the form of order on the Motion for Relief from Stay and for Related Relief filed by the Hoff's at
17 Dkt. 1328.

18
19 As the Hoff's reported in their Statement Re Order Re Motion for Relief from Stay filed on
20 February 2, 2018 under Dkt. 1401, the parties are in agreement on the form of proposed order. The
21 Trustee prepared a cash collateral budget and transmitted that to counsel for the Hoff's on January 31,
22 2018 in accordance with the Court instruction. Since, the parties have engaged in discussion over
23 certain line items in the budget. The Trustee has revised the budget based in part on comments from
24 the Hoff's and due to recent developments affecting cash flow. The revised proposed budget is
25 attached hereto as Exhibit A.
26

TRUSTEE'S STATEMENT RE ORDER RE MOTION FOR
RELIEF FROM STAY - 1
501023190 v1

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1 The Trustee will continue to engage in dialogue with the Hoffs to narrow any disagreement
2 over budget issues and to the extent any issues remain unresolved as of the continued hearing date,
3 the Trustee will be prepared to present those issues to the Court for resolution.
4

5 DATED this 7th day of February, 2018.
6

7 K&L GATES LLP
8

9 By /s/ Michael J. Gearin
10 Michael J. Gearin, WSBA #20982
11 David C. Neu, WSBA #33143
12 Brian T. Peterson, WSBA #42088
13 Attorneys for Mark Calvert, Chapter 11 Trustee
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CERTIFICATE OF SERVICE

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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

EXHIBIT A

NWTFM Case # 16-11767CMA
 Weekly Cash Flow from
 1/31/18 to 3/31/18

	ACTUAL PROJECTED												Total	%	
	Wk Ending 2/4/2018	Wk Ending 2/11/2018	Wk Ending 2/18/2018	Wk Ending 2/25/2018	Wk Ending 3/4/2018	Wk Ending 3/11/2018	Wk Ending 3/18/2018	Wk Ending 3/25/2018	Wk Ending 3/31/2018	Wk Ending 3/31/2018	Wk Ending 3/31/2018	Wk Ending 3/31/2018			
Opening Cash Balance	\$29,652	\$64,851	\$1,486	\$9,149	\$25,664	\$91,020	\$78,817	\$99,206	\$653,651	\$64,851					
Cash Receipts															
Unfactored Collections	\$2,786	\$6,728	\$14,998	\$30,856	\$26,560	\$47,338	\$34,038	\$69,468	\$28,357	\$258,342					19.01%
Prestige Factored A/R	\$0	\$26,166	\$111,259	\$63,295	\$0	\$0	\$0	\$0	\$0	\$200,720					14.77%
Prestige Reserve	\$0	\$0	\$60,000	\$0	\$50,000	\$0	\$0	\$0	\$0	\$110,000					8.09%
Sale of Precious Metals	\$15,719	\$0	\$7,000	\$80,000	\$0	\$0	\$0	\$0	\$0	\$87,000					6.40%
Sale of Equipment Assets	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0					0.00%
Sale of Dies to MetalCraft	\$0	\$0	\$0	\$0	\$100,000	\$0	\$0	\$600,000	\$0	\$700,000					51.51%
Sale of Scrap	\$31,644	\$20,925	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$20,925					1.54%
Payroll Fees	(\$655)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0					0.00%
World Pay Return/Chargeback	(\$126)	(\$513)	(\$500)	(\$1,000)	(\$1,000)	(\$3,000)	(\$3,000)	(\$3,000)	(\$6,000)	(\$18,013)					-1.33%
Total Cash Receipts	\$49,368	\$53,307	\$192,757	\$173,151	\$175,560	\$44,338	\$31,038	\$666,468	\$22,357	\$1,358,975					100.00%
Cash Outflow															
Payroll	\$0	\$41,848	\$0	\$25,000	\$0	\$20,000	\$0	\$20,000	\$0	\$126,848					9.33%
Payroll Liability from last wk of 2017	\$0	\$0	\$0	\$16,562	\$0	\$0	\$0	\$0	\$0	\$16,562					1.22%
Benefits	\$0	\$11,952	\$14,451	\$0	\$0	\$11,280	\$0	\$0	\$11,280	\$48,963					3.60%
Workman's Comp	\$0	\$6,839	\$7,698	\$0	\$7,698	\$0	\$0	\$0	\$7,698	\$29,933					2.20%
General Liability	\$0	\$5,873	\$0	\$0	\$0	\$0	\$2,879	\$0	\$2,879	\$11,630					0.86%
Contract Labor	\$0	\$570	\$4,381	\$570	\$570	\$4,570	\$0	\$8,000	\$4,000	\$27,231					2.00%
Customer Deposits on file to return	\$0	\$0	\$0	\$0	\$34,039	\$0	\$0	\$75,000	\$0	\$109,039					8.02%
Royalties	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0					0.00%
Corp Expenses: Travel	\$0	\$0	\$0	\$3,062	\$4,625	\$0	\$0	\$1,000	\$1,000	\$9,687					0.71%
Corp Taxes - Real & Personal Property	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$16,168					1.19%
Corp expenses - State Taxes	\$2,240	\$2,785	\$18,000	\$18,300	\$0	\$0	\$0	\$300	\$10,000	\$49,385					3.63%
Prestige Factored A/R	\$0	\$26,166	\$111,259	\$75,295	\$0	\$0	\$0	\$0	\$0	\$212,720					15.65%
US Trustee Fees	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$15,000	\$15,000					1.10%
Facility Rent/Lease NV	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$185,784	\$185,784					13.67%
Equipment Lease	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$6,548	\$6,548					0.48%
Utilities	\$11,929	\$0	\$8,545	\$1,000	\$11,014	\$5,523	\$1,000	\$5,523	\$6,523	\$39,128					2.88%
COGS	\$0	\$453	\$0	\$0	\$27,147	\$0	\$0	\$0	\$0	\$27,600					2.03%
Equip Repair/Maint	\$0	\$0	\$0	\$0	\$4,251	\$0	\$0	\$0	\$4,251	\$8,502					0.63%
Consumables	\$0	\$538	\$400	\$200	\$200	\$200	\$200	\$200	\$200	\$2,138					0.16%
IT / Web / Hosting / Server	\$0	\$9,148	\$10,000	\$9,148	\$11,159	\$0	\$0	\$0	\$0	\$39,455					2.90%
UPS/FedEx NV	\$0	\$7,500	\$5,000	\$5,500	\$5,500	\$7,967	\$0	\$0	\$0	\$31,467					2.32%
Plant Maint/EPA compliance	\$0	\$0	\$2,500	\$0	\$0	\$5,000	\$0	\$0	\$0	\$7,500					0.55%
Utilities VA	\$0	\$0	\$267	\$0	\$0	\$0	\$0	\$0	\$0	\$267					0.02%
Facility Rent/Lease WI	\$0	\$1,000	\$319	\$0	\$1,000	\$0	\$0	\$0	\$1,000	\$3,319					0.24%
UPS/FedEx WI	\$0	\$0	\$275	\$2,000	\$1,000	\$0	\$0	\$0	\$0	\$1,275					0.09%
Complete Close down	\$0	\$2,000	\$2,000	\$2,000	\$2,000	\$2,000	\$2,000	\$2,000	\$2,000	\$16,000					1.18%
Total Cash Outflow	\$14,169	\$116,671	\$185,095	\$156,636	\$110,204	\$56,540	\$10,649	\$112,023	\$294,331	\$1,042,148					76.69%
Increase (Decrease) in Cash	\$35,199	(\$53,365)	\$7,662	\$16,515	\$65,356	(\$12,203)	\$20,389	\$554,445	(\$271,974)	\$316,826					
Ending Cash Balance	\$64,851	\$1,486	\$9,149	\$25,664	\$91,020	\$78,817	\$99,206	\$653,651	\$381,677	\$381,677					
	\$0	(\$0)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0					

Comments

The cash collateral budget on a cumulative basis will be deemed to be in compliance if on a line by line basis there is a variance of less than 15%.
 The cash collateral budget on a cumulative basis will be deemed to be in compliance if on a line by line basis there is a variance of less than \$5,000.
 The cash collateral budget will be deemed to be in compliance if on a cumulative basis the variance is less than a 10%.

Estimated Ending Balance

\$0
 \$6,548
 \$0
 \$6,548
 \$388,225