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The Honorable Christopher M. Alston
Chapter 11
Hearing Friday, May 4, 2018, 9:30 a.m.
Seattle, Courtroom 7206
Response due Friday, April 27, 2018

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14 UNITED STATES BANKRUPTCY COURT
15 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

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18 In re:
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20 NORTHWEST TERRITORIAL MINT,
21 LLC,
22
23 Debtor.

Case No. 16-11767-CMA
(Jointly Administered)
HOFF STATEMENT CORRECTING THE
RECORD

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27 Robert and Connie Hoff (the "**Hoffs**"), landlords of the Dayton Premises, submit this
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29 brief statement in an attempt to correct the record regarding a matter of fact that has been
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31 misstated time and time again by the Trustee, most recently in the Trustee's Motion for
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33 Order Approving the Sale of Certain of the Debtor's Assets Free and Clear of all Liens,
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35 Claims, and Encumbrances to Medalcraft Mint, Inc. (the "**Motion**").

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38 The Hoffs filed a UCC-1 financing statement against Medallic Art Limited
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40 Partnership on April 21, 2016, and on May 17, 2016 filed an amendment to that financing
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42 statement, adding Medallic Art Company, LLC ("**MACLLC**") as a debtor. Those filings are
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44 a matter of public record and cannot possibly be in dispute. Nevertheless, the Trustee has on
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HOFF STATEMENT CORRECTING RECORD – 1

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1 at least six occasions misstated the date of the filing of the amendment as having occurred in
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3 May 2017. Despite numerous efforts by the Hoffs' counsel to get the Trustee to correct
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5 these misstatements, the Trustee's pleadings continue to mislead the Court.
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8 The Hoffs do not oppose the Motion. But they do not believe the record should be
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10 left in its current erroneous state. The UCC filing date may be critical in the likely
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12 upcoming litigation over the very dispute about which the Trustee continues to misstate the
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14 record: the dispute over the Hoffs' perfected (or unperfected) lien on the "Medallic assets"
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16 owned or formerly owned by MACLLC. It is time to set the record straight.
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20 Respectfully submitted,
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22 DATED: May 2, 2018
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PERKINS COIE LLP

25 By: /s/ Alan D. Smith

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33 Attorneys for Landlord Robert and Connie
34 Hoff
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CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2018, I caused the foregoing to be filed with the Clerk of the Court using the CM/ECF system which sent notifications of this filing to all parties listed in the case to receive notice electronically.

I further certify that I caused a copy of the same to be sent via first class mail to parties not receiving notice via the CM/ECF system.

/s/ Alan D. Smith
Alan D. Smith

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