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Honorable Christopher M. Alston  
Chapter 11  
Hearing Location: Rm. 7206  
Hearing Date: Friday, April 19, 2019  
Hearing Time: 9:30 a.m.  
Response Date: April 12, 2019

8 UNITED STATES BANKRUPTCY COURT  
9 WESTERN DISTRICT OF WASHINGTON  
10 AT SEATTLE

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

Case No. 16-11767-CMA  
REPLY IN SUPPORT OF MOTION TO  
AUTHORIZE LIQUIDATION OF  
SEIZED PROPERTY AND  
DISTRIBUTION OF PROCEEDS TO  
TRUSTEE

14  
15 **I. REPLY**

16 Plaintiff and Judgment Creditor Mark Calvert as the Chapter 11 Trustee (the “Trustee”) of  
17 Northwest Territorial Mint, LLC (“NWTM”) files this Reply in support of his Motion to Authorize  
18 Liquidation of Seized Property and Distribution of Proceeds to Trustee [Dkt. No. 2044] (the  
19 “Motion”). Ross Hansen and Diane Erdmann filed objections to the Motion. Ms. Erdmann’s  
20 objection is largely a personal attack on the Trustee. Ms. Erdmann also identifies the majority of the  
21 seized inventory that is the subject of the Motion as belonging to her. Mr. Hansen’s objection states  
22 that the other items not claimed by Ms. Erdmann belong to him. Neither objection offers a legal  
23 justification for denying the relief requested in the Motion and allowing the Trustee to execute on  
24 Ms. Erdmann’s interest in the seized inventory.  
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REPLY IN SUPPORT OF MOTION TO AUTHORIZE  
LIQUIDATION OF SEIZED PROPERTY AND DISTRIBUTION  
OF PROCEEDS TO TRUSTEE - 1  
502189949 v5

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1 The fact that Ms. Erdmann and Mr. Hansen have claimed an ownership interest in *all* of the  
2 items of seized inventory highlights that the property should be split between the Cohen Parties and  
3 the Trustee according to the terms of the agreed-upon settlement. The assertions of Mr. Hansen and  
4 Ms. Erdmann regarding the ownership of individual items, for various reasons, cannot be adopted  
5 wholesale by the Trustee, this Court, and the Cohen Parties. The pending settlement with the Cohen  
6 Parties avoids the need for a factual determination regarding which assets were owned by Ms.  
7 Erdmann (in which case they are subject to execution by the Trustee) and which assets were owned  
8 by Mr. Hansen (in which case they are subject to execution by the Cohen Parties).

9 The Trustee therefore respectfully requests that the Court grant the Motion and authorize him  
10 to liquidate the Seized Property and to distribute the proceeds of such liquidation to the bankruptcy  
11 estate and the Cohen Parties in accordance with the terms of the Cohen Settlement Agreement.

12 DATED this 16th day of April, 2019.

13  
14 K&L GATES LLP

15 By: /s/ David C. Neu  
16 Michael J. Gearin, WSBA # 20982  
17 David C. Neu, WSBA #33143  
18 Brian T. Peterson, WSBA #42088  
19 Attorneys for Mark Calvert, Chapter 11 Trustee  
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1 **CERTIFICATE OF SERVICE**

2 The undersigned declares as follows:

3 That she is a paralegal in the law firm of K&L Gates LLP, and on April 16, 2019, she caused  
4 the foregoing document to be filed electronically through the CM/ECF system which caused  
5 Registered Participants to be served by electronic means, as fully reflected on the Notice of  
6 Electronic Filing.

7 Also on April 16, 2019, she caused the foregoing document to be placed in the mail to the  
8 Parties at the addresses listed below:

9 Diane Erdmann  
10 PO Box 4024  
11 Federal Way, WA 98063

12 Diane Erdmann  
13 c/o Allen Lichtenstein  
14 3315 Russell Road, No. 222  
15 Las Vegas, NV 89120

16 Ross B. Hansen  
17 PO Box 4024  
18 Federal Way, WA 98063

19 I declare under penalty of perjury under the laws of the State of Washington and the United  
20 States that the foregoing is true and correct.

21 Executed on the 16th day of April, 2019 at Seattle, Washington.

22 /s/ Denise A. Lentz  
23 Denise A. Lentz  
24  
25