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Honorable Christopher M. Alston
Chapter 11
Ex Parte

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

9 In re:
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11 NORTHWEST TERRITORIAL MINT, LLC,

Case No. 16-11767-CMA

12 *EX PARTE* MOTION TO SHORTEN TIME
ON MOTION FOR ORDER APPROVING
THE SALE OF THE DEBTOR'S
13 TOMBALL, TEXAS ASSETS FREE AND
CLEAR OF ALL LIENS, CLAIMS,
INTERESTS, AND ENCUMBRANCES;
14 APPROVING THE ASSUMPTION AND
ASSIGNMENT OF CERTAIN OF THE
DEBTOR'S EXECUTORY CONTRACTS;
15 AND GRANTING OTHER RELATED
RELIEF

16
17 Mark Calvert, the Chapter 11 Trustee (the "Trustee"), moves the Court for an order
18 shortening time for a hearing on the Motion for Order Approving the Sale of the Debtor's Tomball,
19 Texas Assets Free and Clear of all Liens, Claims, Interests, and Encumbrances; Approving the
20 Assumption and Assignment by the Debtor to Buyer of Certain of the Debtor's Executory Contracts;
21 and Granting Other Related Relief (the "Motion").

22 Cause exists to shorten time on the Motion. The Trustee seeks an order shortening time so
23 that the Motion for the sale of the Debtor's business commonly referred to as Graco Awards
24 Manufacturing located on Tomball, Texas ("Graco") can be heard expeditiously. The Trustee has
25 investigated the Graco business, and evaluated whether it is in the best interests of the estate to
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EX PARTE MOTION TO SHORTEN TIME ON MOTION
FOR ORDER APPROVING SALE OF REAL PROPERTY-

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1 liquidate the business or operate it as a going concern. As set forth in the Trustee's declaration
2 submitted in support of the Motion, the Trustee has determined that the Debtor's operations are
3 suffering from a cash shortfall. Because the Trustee needs to generate cash to preserve other aspects
4 of the Debtor's business, the Graco assets must be sold as quickly as possible. Additionally, the
5 Court has previously indicated it would be willing to shorten time on a motion to sell the Debtor's
6 assets in Texas and reserved time on May 26, 2016 for a hearing on such a motion.

7 Based on the foregoing, the Trustee respectfully requests that this Court grant this *ex parte*
8 Motion and shorten the time for hearing on the Motion to May 26, 2016 at 1:30 p.m. The Trustee
9 further requests that any responses to the Motion be due on Monday, May 23rd at midnight, and any
10 replies thereto be due on May 25th at noon.

11 In addition, the Motion requests that the Court approve the assumption and assignment of
12 certain executory contracts in connection with the proposed sale. According to the Motion and the
13 Purchase Agreement, the Buyer will have until May 10, 2016 at 5:00 p.m. (the "Assumed Contracts
14 Deadline"), to select the executory contracts it wishes to assume under the Purchase Agreement. The
15 Trustee will promptly provide notice to the counterparties of such Assumed Contracts, so that they
16 may have an opportunity to respond to the proposed assumption and assignment or proposed cure
17 amounts related thereto. The Trustee requests that the deadline for submitting such objections shall
18 be May 24, 2016 at 5:00 p.m. (the "Cure Cost/Assignment Objection Deadline"). In the event that
19 objections to cure cost amounts or the assignment of executory contracts is received by the Cure
20 Cost/Assignment Objection Deadline, the Trustee will schedule an additional hearing following the
21 hearing on the Sale Motion to resolve outstanding disputes with respect to cure costs. Disputes as to
22 the assignability of the executory contracts or leases will be resolved at the sale hearing.

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1 Thus, the Trustee requests that the Court establish the deadline for objection to the
2 assumption and assignment of executory contracts to May 24, 2016 at 5:00 p.m., consistent with the
3 procedures set forth above and as described in the Motion.

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5 DATED this 9th day of May, 2016.

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7 K&L GATES LLP

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9 By /s/ Michael J. Gearin
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13 Attorneys for Mark Calvert, Chapter 11 Trustee
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