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Honorable Christopher M. Alston
Chapter 11
Hearing Location: Rm. 7206
Hearing Date: Friday, October 18, 2019
Hearing Time: 9:30 a.m.
Response Date: October 11, 2019

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8 UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 In re:

Case No. 16-11767-CMA

10 NORTHWEST TERRITORIAL MINT,
11 LLC,

NOTICE OF HEARING ON MOTION TO
APPROVE SETTLEMENT WITH BRADLEY
STEPHEN COHEN AND COHEN ASSET
MANAGEMENT AND KATHRYN A. ELLIS
AND TO AUTHORIZE SALE OF SEIZED
PROPERTY

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15 TO: NORTHWEST TERRITORIAL MINT, LLC, Debtor;
16 AND TO: UNITED STATES TRUSTEE;
AND TO: SPECIAL NOTICE LIST;

17 PLEASE TAKE NOTICE that a hearing has been scheduled on **October 18, 2019, at 9:30 a.m.**
18 **(PT)** before the Honorable Christopher M. Alston, United States Bankruptcy Judge, in Courtroom 7206,
700 Stewart Street, Seattle, WA, 98101 on the Trustee's Motion to Approve Settlement with Bradley
19 Stephen Cohen and Cohen Asset Management and Kathryn A. Ellis and to Authorize the Sale of Seized
Property (the "Motion").

20 On March 1, 2016, a judgment was entered against Ross Hansen by the United States District Court
21 for the District of Nevada, under case no. 12-01401 (the "Cohen Lawsuit"), in favor of Bradley Stephen
Cohen and Cohen Asset Management, Inc. (the "Cohen Parties").

22 On May 13, 2016, the King County, Washington, Sheriff executed a Writ of Execution at the
23 residence of Ross Hansen. The Sheriff seized personal property including coins and bullion, computers and
24 paper records (the "Seized Property").

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26 NOTICE OF HEARING MOTION TO APPROVE
SETTLEMENT WITH BRADLEY STEPHEN COHEN AND
COHEN ASSET MANAGEMENT AND KATHRYN A. ELLIS
AND TO AUTHORIZE SALE OF SEIZED PROPERTY- 1

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1 On April 18, 2019, Diane Erdmann, Ross Hansen's girlfriend, filed for Chapter 13 relief under case
2 no. 19-41238 (the "Erdmann Bankruptcy Case", and its estate, the "Erdmann Bankruptcy Estate"). On
3 June 14, 2019, the Erdmann Bankruptcy Case was converted to a Chapter 7 proceeding, and Kathryn A. Ellis
4 (the "Erdmann Trustee") was appointed as the Chapter 7 Trustee.

5 Mark Calvert, Chapter 11 Trustee of Northwest Territorial Mint, LLC (the "NWTM Trustee")
6 asserts that the Seized Property is property of the Northwest Territorial Mint bankruptcy estate. The
7 Erdmann Trustee asserts the Seized Property is property of the Erdmann Bankruptcy Estate. The Cohen
8 Parties take the position that some or all of the Seized Property may belong to Ross Hansen and therefore
9 should be available to satisfy their judgment against Hansen.

10 The NWTM Trustee, the Erdmann Trustee, and the Cohen Parties have agreed upon the terms of a
11 settlement (the "Settlement") pursuant to which the Seized Property will be sold¹, and the proceeds divided.
12 The Cohen Parties will receive the first \$25,000 of the proceeds of the liquidation of the Seized Property, with
13 the remainder of the proceeds to be split evenly (50/50) between the NWTM Trustee and the Erdmann
14 Trustee. The Settlement also resolves the ownership of certain litigation claims held by the NWTM Trustee
15 and the Erdmann Trustee regarding the sale of several hundred thousands of dollars in precious metal by
16 Diane Erdmann, the proceeds of which were transferred to third parties (the "Transfer Claims"). Under the
17 Settlement, the NWTM Trustee will assign his rights to the Transfer Claims to the Erdmann Trustee. The
18 Erdmann Trustee will pursue the Transfer Claims, and any net recovery will be split evenly (50/50) between
19 the Erdmann Trustee and the NWTM Trustee. By the Motion, the NWTM Trustee requests that the Court
20 approve the terms of the Settlement.

21 The NWTM Trustee has received an offer from Bellevue Rare Coins to purchase the Seized Property
22 for the amount of \$142,095.77 as of September 19, 2019 (the "Original Offer"). Because market prices for
23 precious metal fluctuate, the purchase price at the time of closing of a sale will be higher or lower than the
24 Original Offer. The NWTM Trustee will entertain any other offer to purchase the Seized Property. By the
25 Motion, the Trustee seeks authority to sell the Seized Property to Bellevue Rare Coins or such party that
26 makes a higher and better offer for no less than \$127,886.19 (ten percent less than the Original Offer) free and
clear of liens, claims, interests, and encumbrances.

PLEASE TAKE FURTHER NOTICE that copies of the Motion and related documents may be
(1) reviewed and copied at the Clerk of the United States Bankruptcy Court, 700 Stewart Street, Seattle, WA
98101 or (2) may be obtained by submitting a written request to Ms. Denise Lentz, Paralegal, K&L Gates,
LLP, 925 Fourth Avenue, Suite 2900, Seattle, WA 98104-1158, Email: denise.lentz@klgates.com.

PLEASE TAKE FURTHER NOTICE THAT IF YOU OPPOSE the Motion, you must file your
objection NO LATER THAN **Friday, October 11, 2019**. Objections must be filed with the Court, 700
Stewart Street, Seattle, WA, 98101, and a copy delivered to:

¹ The Seized Property includes approximately \$6,500 in cash, which will not be sold, but divided
between the respective bankruptcy estates, and an iPad and Dell computer, which will also not be
sold.

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PLEASE TAKE FURTHER NOTICE that in accordance with Local Bankruptcy Rule 9013-1(d)(7), failure to timely file and serve an objection to the Motion may be deemed by the Court an admission that any opposition to the Motion is without merit. Further, pursuant to Local Bankruptcy Rule 9013-1(e), failure to appear at the hearing on the Motion may be deemed by the Court to be an admission that any opposition to the Motion is without merit. Further, pursuant to Local Bankruptcy Rule 9013-1(f), if no opposition to the Motion is timely filed and served, the Court may either (a) grant the Motion by default at the hearing, or (2) grant the Motion prior to the hearing on the Trustee's ex parte presentation of a proposed order accompanied by proof of service and a declaration that no objection to the Motion was timely received.

DATED this 2nd of October, 2019.

K&L GATES LLP

By /s/ David C. Neu
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Attorneys for Mark Calvert, Chapter 11 Trustee