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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: Time of Hearing

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

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

Case No. 16-11767-CMA
RESPONSE TO OBJECTION ON
BEHALF OF ROSS HANSEN TO
MOTION TO APPROVE SETTLEMENT

13 Mark Calvert, Chapter 11 Trustee of Northwest Territorial Mint, LLC (the “NWTM
14 Trustee”) responds to the objection (the “Objection”) Ross Hansen (“Hansen”) to his Motion to
15 Approve Settlement with Bradley Cohen and Cohen Asset Management, Inc. and Kathryn A. Ellis
16 and to Authorize Sale of Seized Property (the “Motion”) as follows:

17 Hansen objects to the proposed sale as he assert several items which were seized by the King
18 County Sheriff belong to him. The items which he assert belong to him (the “Alleged Hansen
19 Property”) are the following:

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#	Lot	Description	Weight	Quantity	Price
21	2 1&2	Bag Silver Bars/Copper Rounds	7.1 LBS	1	\$800.00
22	3 1&2	Bag Wheat Pennies 50 Face worth 2.5 Cents Each	34 LBS 2.78	1	\$112.50
23	4 1&2	Apple Ipad Pro Small Cardboard Box of	LBS 4.06	1	N/A
24	10 3&4	Misc Coins, Bars and Knifes Red Box with Misc Medals	LBS 8.87	1	\$260.00
25	12 3&4	and Tokens	LBS	1	\$1,150.00

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RESPONSE TO HANSEN OBJECTION - 1
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2	48	5&6	Bag of Misc Token Medals - Mostly Non Precious		1	\$235.00
3	49	5&6	Box Lot Misc Medals, Belt Buckle, Hobo Nickel		1	\$75.00
4	50	5&6	Box Lot British Cap Insignia, Military & School Medals		1	\$300.00
5	51	5&6	Assortment of Spoons Medals, Money Clips, ID	4.05 LBS	1	\$75.00
6	52	7&8	Tags Dell Desktop Computer and Monitor		1	N/A
7	57	10	Small Box Medals - Lapel Pins		1	\$75.00
8	77	13	Lot Misc Coins, Medals and Tokens		1	\$210.00
9	78	14- 16	Files and Papers - N/A for evaluation			N/A
10	83	17	Misc Medals		4	\$1.25

11
12 Of these items, nos. 4, 52, and 78 are not part of the proposed sale. The files and papers were
13 turned over to Hansen in early 2019.

14 As is detailed in the Motion, these items were seized by the King County Sheriff in an
15 execution related to a judgment against Hansen in favor of Bradley Cohen and Cohen Asset
16 Management, Inc. (the "Cohen Parties"). The Seized Property, as defined in the Motion, was turned
17 over to the NWTM Trustee pending a determination as to whether it belonged to the NWTM estate,
18 Diane Erdmann, or Hansen. The Settlement was reached to resolve this very issue.

19 Hansen now asserts that the Alleged Hansen property is exempt from execution under RCW
20 6.15.010. He does not specify under which of the subsections of RCW 6.15.010 he is asserting the
21 exemption, however the only applicable subsection appears to be RCW 6.15.010(1)(d)(ii), which
22 provides an exemption of up to \$3,000 in miscellaneous personal property.

23 Setting aside any issues regarding whether Hansen really owns the Alleged Hansen Property,
24 and whether the value exceeds the statutory exemption amount, the NWTM Trustee and Erdmann
25 Trustee will agree to pull the Alleged Hansen property from the proposed sale. Neither the NWTM
26

1 Trustee or the Erdmann Trustee can consent to turning over the Alleged Hansen Property to Hansen,
2 given that the Alleged Hansen Property was seized in enforcement of the Cohen Judgment. The
3 NWTM Trustee has reached out to the attorney for the Cohen Parties seeking their agreement to turn
4 over Alleged Hansen Property in a value not to exceed \$3,000 to Hansen, but at the time of writing
5 has received no response.

6 The NWTM Trustee proposes that the Court enter an order approving the Settlement, and
7 authorizing the liquidation of the Seized Property, less the Alleged Hansen Property. The NWTM
8 Trustee further requests that the Court order that subject to agreement of the Cohen Parties, the
9 Alleged Hansen Property be turned over to Hansen, through his counsel, or, absent the consent of the
10 Cohen Parties, it be turned over to the King County Sheriff so that Hansen can claim his state law
11 exemptions.

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13 DATED this 17th day of October, 2019

14 K&L GATES LLP

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

The undersigned declares as follows:

That she is a paralegal in the law firm of K&L Gates LLP, and on October 17, 2019, 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 17th day of October, 2019 at Seattle, Washington.

/s/ Denise A. Lentz
Denise A. Lentz