1		Honorable Christopher M. Alston Hearing Date: October 18, 2019	
2 3		Hearing Time: 9:30 a.m. Location: Seattle	
4		Chapter 11	
5	UNITED STATES BANKRUPTCY COURT		
6	WESTERN DISTRICT OF WASHINGTON		
7	In re	No. 16-11767	
8	NORTHWEST TERRITORIAL MINT LLC,	SUPPLEMENTAL RESPONSE IN	
9		SUPPORT OF NORTHWEST TERRITORIAL MINT LLC'S MOTION TO	
10 11		APPROVE SETTLEMENT WITH BRADLEY STEPHEN COHEN AND	
12		COHEN ASSET MANAGEMENT AND	
13		KATHRYN A. ELLIS AND TO AUTHORIZE SALE OF SEIZED	
14		PROPERTY	
15			
16	COMES NOW Kathryn A. Ellis, the Chapter 7 Trustee of the bankruptcy estate of Diane Erdmann, Bk. No. 19-41238, by and through the undersigned attorney, and submits the attached		
17			
18	Declaration of Trustee (Exhibit 1) and Declaration of Christopher G. Williams (Exhibit 2) that		
19	have been filed in the Erdmann estate (Bk. No. 19-41238, Docket Nos. 85 and 86, respectively)		
20	in supplement to the Response in support of Northwest Territorial Mint LLC's Motion to		
21			
22	Approve Settlement with Bradley Stephen Cohen	and Cohen Asset Management and Kathryn A.	
23	Ellis and to Authorize Sale of Seized Property (Do	ocket No. 2131).	
24	DATED this 17 th day of October, 2019.		
25			
26		/s/ Kathryn A. Ellis	
27		Kathryn A. Ellis, WSBA #14333	
28	C:\Shared\OneDrive - Kathryn A Ellis\Shared\KAE\Dox\TRUSTEE\Erdmann\NW	Attorney for Trustee TM\settle_dec_reply.wpd	
	SUPPLEMENTAL RESPONSE IN SUPPORT OF NORTHWEST TERRITORIALKATHRYN A. ELLIS PLLCMINT LLC'S MOTION TO APPROVE SETTLEMENT WITH BRADLEY5506 6 th Ave SSTEPHEN COHEN AND COHEN ASSET MANAGEMENT AND KATHRYNSeattle, WA 98108A. ELLIS AND TO AUTHORIZE SALE OF SEIZED PROPERTY - 1(206) 682-5002		
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EXHIBIT 1

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1	Honorable Mary Jo Heston			
2	Hearing Date: October 22, 2019 Hearing Time: 9:00 a.m.			
3	Response Date: October 15, 2019 Location: Tacoma			
4	Chapter 7			
5	UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WASHINGTON			
6 7				
8	In re No. 19-41238			
9	DIANE ERDMANN, DECLARATION OF TRUSTEE IN SUPPORT OF REPLY TO OBJECTIONS Debtor. OF ERDMANN AND PEHL TO MOTION			
10	TO APPROVE SETTLEMENT AND SALE OF ESTATE'S INTEREST IN COIN AND			
11 12	METAL INVENTORY			
13	Kathryn A. Ellis declares and states as follows:			
14				
15	1. I am the Trustee in this matter and have testimonial knowledge of the facts set			
16	forth in this declaration.			
17	2. After buyer Bellevue Rare Coins was located, I drafted a solicitation letter			
18	directed to businesses in the coin and precious metal buying trades. The highest and best offer I			
19	have received is from American Rarities Rare Coin Company in the amount of \$147,000. This			
20	offer is not subject to the buyer's inspection of the inventory. Presently, I am circulating that			
21	offer to the other potentially interested buyers, including the proposed buyer in the motion,			
22 23	//			
23	//			
25	$H^{\mathcal{N}}$			
26				
27				
28	DECLARATION OF TRUSTEE IN SUPPORT OF REPLY TO OBJECTIONS OF ERDMANN AND PEHL TO MOTION TO APPROVE SETTLEMENT AND SALE OF ESTATE'S INTEREST IN COIN AND METAL INVENTORY - 1KATHRYN A. ELLIS PLLC 5506 6 th Ave S Suite 207 Seattle, WA 98108 (206) 682-5002			
Cas Case	Case 19-41238-MJH Doc 85 Filed 10/17/19 Ent. 10/17/19 16:05:11 Pg. 1 of 2 Case 16-11767-CMA Doc 2132 Filed 10/17/19 Ent. 10/17/19 16:36:42 Pg. 3 of 8			

1	Bellevue Rare Coin, to determine whether any higher bids or offers will be made up to or at the		
2	time of the hearing.		
3	I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.		
4	Dated this 17 th day of October, 2019 at Seattle, Washington.		
5	Dated tins 17 day of October, 2019 at Beattle, Washington.		
6	By: <u>/s/ Kathryn A. Ellis</u>		
7	Kathryn A. Ellis C:\Shared\OneDrive - Kathryn A Ellis\Shared\KAE\Dox\TRUSTEE\Erdmann\settle_reply_KAE_dec.wpd		
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28	DECLARATION OF TRUSTEE IN SUPPORT OF REPLY TO OBJECTIONS OF ERDMANN AND PEHL TO MOTION TO APPROVE SETTLEMENT AND SALE OF ESTATE'S INTEREST IN COIN AND METAL INVENTORY - 2KATHRYN A. ELLIS PLLC 		
Cas Case	e 19-41238-MJH Doc 85 Filed 10/17/19 Ent. 10/17/19 16:05:11 Pg. 2 of 2 16-11767-CMA Doc 2132 Filed 10/17/19 Ent. 10/17/19 16:36:42 Pg. 4 of 8		

EXHIBIT 2

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1	Honorable Mary Jo Heston		
2	Hearing Date: October 22, 2019 Hearing Time: 9:00 a.m.		
3		Response Date: October 15, 2019 Location: Tacoma Chapter 7	
5	UNITED STATES BA	-	
6	WESTERN DISTRICT OF WASHINGTON		
7	In re:	No. 19-41238	
8	DIANE ERDMANN,	DECLARATION OF CHRISTOPHER G.	
9	Debtor.	WILLIAMS IN SUPPORT OF REPLY TO OBJECTIONS OF ERDMANN AND PEHL	
10		TO MOTION TO APPROVE SETTLEMENT AND SALE OF ESTATE'S INTEREST IN	
11		COIN AND METAL INVENTORY	
12 13	Christopher G. Williams, declares and states as follows:		
14	1. I am the assistant to the Trustee herein, have testimonial knowledge of the facts set		
15	forth in this declaration and competent to testify thereto.		
16	2. The Trustee drafted a solicitation letter and directed me to send that to businesses in		
17	the coin and precious metal buying trades. I conducted an online investigation for possible business		
18	and, where email addresses or fax numbers were not posted on their websites, called such businesses		
19	to obtain their contact information. Attached hereto as Exhibit 1 is my tracking list of to whom,		
20	when, and how the Trustee's letter was sent, together with the parties' responses as they have been		
21 22	received, if any to date.		
22	I DECLARE UNDER PENALTY OF PERJURY TH	AT THE FOREGOING IS TRUE AND CORRECT.	
24	Dated this 16 th day of October, 2019 at Seattle, Washington.		
25		/s/ Christenhan C. W'll'	
26	•	/s/ Christopher G. Williams Thristopher G. Williams	
27	C. SmarculoneDrive - Kaun yn A Einslonareu/KAE/Dox/1 KUS I EE/Erdmann/se	ure_repry_CG w_aec.wpa	
28	DECLARATION OF CHRISTOPHER G. WILLIAMS SUPPORT OF REPLY TO OBJECTIONS OF ERDM. PEHL TO MOTION TO APPROVE SETTLEMENT A ESTATE'S INTEREST IN COIN AND METAL INVE	ANN AND 5506 6 th Ave S Suite 207 AND SALE OF Seattle, WA 98108	
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EXHIBIT 1

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Renton Coin Shop Inc. Northgate Rare Coins & Precious Metals The Gold Center Inc. Sound Gold Buyers The Coin Market LLC Redmond Rare Coins American Rarities Rare Coin Company Cash for Gold Market Coins & Collectibles Pacific Iron & Metal	Email Email Email Email Email (2 addresses) Email Email Email Facsimile		
Sent 10/7/2019			
Seattle Coin Shop	Email		
Sent 10/11/2019			
Coin & Stamp Shop LJR Coins Tacoma Mall Blvd Coin & Stamp Pinnacle Rarities B&I Coin Shop not in American Coin & Vault	Email Email Email Email terested (but referred me to American Coin & Vault) Email		
Sound Gold Buyers	10/5/19 email saying no thank you.		
Renton Coin Shop Inc.	10/4 VM - interested in bidding		
American Rarities Rare Coin Company	10/15 email - \$135,235 bid; requests inspection 10/4 T/C - will send offer 10/7/19 10/10 email - \$147,500 bid		
Redmond Rare Coins	10/7 T/C - will send soft bid, subject to inspection 10/8 email - \$130,000 bid; requests inspection		
Pacific Iron & Metal	10/9 T/C - will send email confirming interest, but will require inspection first 10/10 email - notice of interest; requests inspection 10/10 email - notice of interest; requests inspection 10/11 email - notice of interest 10/15 email (2) - notice of interest 10/15 email - \$128,300 bid		
Seattle Coin Shop Coin & Stamp Shop LJR Coins			

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