

The Honorable Christopher M. Alston  
Chapter 11  
Hearing Location: Seattle, WA  
Hearing Date: April 7, 2016  
Hearing Time: 9:30 a.m.  
Response Due: At the time of hearing

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

In re

NORTHWEST TERRITORIAL MINT,  
LLC,

Debtor.

NO. 16-11767-CMA

Chapter 11

EX PARTE MOTION TO  
WITHDRAW OPPOSITION BY  
CREDITORS BRADLEY S. COHEN  
AND COHEN ASSET  
MANAGEMENT, INC. TO  
DEBTOR'S EMERGENCY  
MOTION, OR TO RESTRICT  
ACCESS THERETO, AND  
SUBJOINED DECLARATION OF  
MICHAEL E. GOSSLER IN  
SUPPORT THEREOF

**MOTION**

Bradley S. Cohen and Cohen Asset Management, Inc. ("Cohen") move the court to withdraw and/or restrict access to the Opposition by Creditor Bradley S. Cohen and Cohen Asset Management, Inc. to Debtor's Emergency Motion Authorizing Retention of CRO's and in Support of the *Sua Sponte* Appointment of a Chapter 11 Trustee filed under Docket No. 18 (the "Opposition"). The undersigned counsel for

EX PARTE MOTION TO WITHDRAW  
OPPOSITION BY CREDITORS BRADLEY  
S. COHEN AND COHEN ASSET  
MANAGEMENT, INC. TO DEBTOR'S  
EMERGENCY MOTION AND REFILE SAID  
RESPONSE, AND SUBJOINED  
DECLARATION OF MICHAEL E. GOSSLER  
IN SUPPORT THEREOF- 1

**MONTGOMERY PURDUE BLANKINSHIP & AUSTIN PLLC**  
ATTORNEYS AT LAW  
5500 COLUMBIA CENTER  
701 FIFTH AVENUE  
SEATTLE, WA 98104-7096  
(206) 682-7090 TEL  
(206) 625-9534 FAX

MPBA{17065/006/01119497-1}

1 Cohen discovered, upon printing the Opposition immediately after it had been filed,  
2 that Exhibit D thereto inadvertently included at the end, email communications  
3 between Cohen's counsel that are unrelated to and not part of the exhibit. As such,  
4 Cohen requests that the document be withdrawn and/or that access be restricted  
5 from viewing by the general public. The Opposition is being refiled with the correct  
6 form of Exhibit D. This motion is supported by the subjoined declaration of Michael E.  
7 Gossler.

8 DECLARATION OF MICHAEL E. GOSSLER

9 Michael E. Gossler declares as follows:

10 1. Identity. I am one of the attorneys of record for Bradley S. Cohen and  
11 Cohen Asset Management, Inc.

12 2. Filing of Response. My office just filed with the court a response under  
13 Docket No. 18. After printing the response, I discovered that the last three pages of  
14 Exhibit D constitute email correspondence between Cohen's counsel that are not part  
15 of Exhibit D and should be restricted from public access. When the exhibit was  
16 made, email printouts on my desk next to the exhibit inadvertently was picked up as  
17 part of the exhibit. The Response filed under Docket No. 18 should be withdrawn, or  
18 alternatively access should be restricted such that it is not available for public  
19 viewing. A replacement Opposition is being filed herewith.

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1 DATED this 6<sup>th</sup> day of April, 2016.

2 MONTGOMERY PURDUE BLANKINSHIP  
3 & AUSTIN PLLC

4  
5 By: /s/ Michael E. Gossler

6 Michael E. Gossler  
7 WA State Bar No. 11044  
8 Joseph A. Hamell  
9 WA State Bar No. 29423  
10 Attorneys for Bradley S. Cohen and  
11 Cohen Asset Management, Inc.

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**CERTIFICATE OF SERVICE**

The undersigned certifies under penalty of perjury under the laws of the State of Washington that I am, and at all times herein mentioned have been, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above-mentioned action, and competent to be a witness herein.

On the date written below, I caused the above document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following persons:

- James F Dart: jdart@shoedartlaw.com, office@shoedartlaw.com; kshoemaker@shoedartlaw.com
- Zachary Mosner: bcumosner@atg.wa.gov
- Steven J Reilly: steven@thetracylawgroup.com, thao@thetracylawgroup.com; nancy@thetracylawgroup.com
- Martin L. Smith: martin.l.smith@usdoj.gov, Young-Mi.Petteys@usdoj.gov; Tara.Maurer@usdoj.gov; Martha.A.VanDraanen@usdoj.gov
- J Todd Tracy: todd@thetracylawgroup.com, thao@thetracylawgroup.com; nancy@thetracylawgroup.com
- United States Trustee: USTPRegion18.SE.ECF@usdoj.gov
- Alan J Wenokur: ajw@seanet.com, shelbyecf@gmail.com

DATED this 6<sup>th</sup> day of April, 2016, at Seattle, Washington.

/s/ Karen L. Baril  
\_\_\_\_\_  
Karen L. Baril

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OPPOSITION BY CREDITORS BRADLEY  
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