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Honorable Christopher M. Alston  
Chapter 11  
*Ex Parte*

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8 UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 In re:  
10 NORTHWEST TERRITORIAL MINT, LLC,

Case No. 16-11767-CMA

11 OBJECTION OF CHAPTER 11 TRUSTEE  
12 TO MEDALLIC ART COMPANY LLC'S  
13 EX PARTE MOTION FOR ORDER  
14 COMPELLING PRODUCTION OF  
DOCUMENTS

15 Mark Calvert, Trustee (the "Trustee") for the Northwest Territorial Mint, LLC ("NWTM"),  
16 in the above-captioned proceeding, by and through his attorneys, K&L Gates, LLP, hereby files this  
17 objection to the Ex Parte Motion (the "Motion") for Order Compelling Production of Documents  
18 filed by Medalliac Art Company, LLC ("Medalliac"). Specifically, the Trustee objects to the provision  
19 in the proposed order granting the Motion which allows "Ross B. Hansen, as manager for Medalliac  
20 Art Company, LLC, to gain access to his office . . . to access and review" records. The Trustee does  
21 not object to providing such records as relate, refer, or pertain to Medalliac, however he strenuously  
22 objects to allowing Mr. Hansen personal access to the physical and electronic records located at the  
23 Debtor's facilities. In essence, Mr. Hansen, against whom the Debtor likely holds significant claims,  
24 is asking for access to the *Debtor's* original records, and the ability to sort through them, on an  
25 unfettered basis, in an effort to find apparently co-mingled "Medalliac" business records. If given  
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TRUSTEE'S OBJECTION TO EX PARTE MOTION  
COMPELLING PRODUCTION OF DOCUMENTS - 1

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1 access to the Debtor's business records, Mr. Hansen could potentially alter, destroy, or remove  
2 records related to claims which the Debtor may hold against him. Accordingly, any order approving  
3 the Motion should require Medallic to provide the Trustee with a list of business records to which is  
4 seeks access, and the location of such records, so that the Trustee may produce them to Medallic.  
5

6 DATED this 27th day of May, 2016.  
7

8 K&L GATES LLP  
9

10 By /s/ David C. Neu  
11 Michael J. Gearin, WSBA #20982  
12 David C. Neu, WSBA #33143  
13 Brian T. Peterson, WSBA #42088  
14 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 May 27, 2016, 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 27th day of May, 2016 at Seattle, Washington.

/s/ Denise A. Evans  
Denise A. Evans