1 2	Michael J. Gearin, WSBA # 20982 David C. Neu, WSBA # 33143 Brian T. Peterson, WSBA # 42088	Honorable Christopher M. Alston Chapter 11 <i>Ex Parte</i>				
3	K&L GATES LLP 925 Fourth Avenue, Suite 2900					
4	Seattle, WA 98104-1158 (206) 623-7580					
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7						
8	UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE					
9	In re:	Case No. 16-11767-CMA				
10	NORTHWEST TERRITORIAL MINT, LLC,	EX PARTE MOTION FOR				
11	NORTHWEST TERRITORIAE WINT, EEC,	EXAMINATION OF MICHAEL PARISH				
12		PURSUANT TO RULE 2004 AND SUBPOENAS PURSUANT TO RULE				
13		9016				
14						
15	Mark Calvert, Trustee for the Northwest Territorial Mint, LLC ("NWTM"), in the above-					
16	captioned proceeding, by and through his attorneys, K&L Gates, LLP, moves the Court for entry of					
17	an <u>ex parte</u> order for examination of Michael Parish pursuant to Federal Rules of Bankruptcy					
18	Procedure 2004(b) and (c).					
19	1. On April 1, 2016, NWTM filed a	a voluntary petition for relief under Chapter 11 of the				
20	United States Bankruptcy Code.					
21	2. On April 11, 2016, Mark Calvert (the "Trustee") was appointed as the Chapter 11					
22	Trustee of NWTM.					
23	3. Since his appointment, the Trust	ee has been working to stabilize and maintain the				
24	business operations of NWTM, as well as to investigate the assets and liabilities of the estate.					
25						
26						
	<i>EX PARTE</i> MOTION FOR SUBPOENA PURSUANT TO RULES 2004 AND 9016 - 1 K:2070561\00001\20347_DCN\20347A28JI	K&L GATES LLP 925 FOURTH AVENUE, SUITE 2900 SEATTLE, WASHINGTON 98104-1158 TELEPHONE: (206) 623-7580 FACSIMILE: (206) 623-7022				

Case 16-11767-CMA Doc 323 Filed 05/27/16 Ent. 05/27/16 14:26:03 Pg. 1 of 3

4. Ross B. Hansen is the sole member of NWTM, and on information and belief, maintained exclusive control and authority over its business operations from the time of its founding until the appointment of the Trustee.

5. Ross B. Hansen testified under oath in supplemental proceedings conducted in case no. 16-2-05611-3, King County Superior Court, that Mr. Parish or his company, Olympic Trading Corporation, paid certain expenses of Ross Hansen, including attorney retainers. Mr. Hansen advised this Court that Mr. Parish or his company, Olympic Trading Corporation, is the source of funds which Mr. Hansen proposes to use to purchase the Debtor's Tomball, Texas, operations.

6. The Trustee deems it essential to examine Michael Parish and records and documents in his possession, custody or control as described in <u>Exhibit A</u> pursuant to Bankruptcy Rule 2004, relating to the acts, conduct, or property, to the liabilities and financial condition of NWTM, and to matters which may affect the administration of NWTM's estate.

 In addition, the Trustee seeks an order that Michael Parish appear for oral examination to give testimony regarding matters which may affect the administration of NWTM's estate.

WHEREFORE, the Trustee respectfully requests that the court enter an order in substantially the form filed concurrently herewith.

DATED this 27th day of May, 2016.

K&L GATES LLP

By <u>/s/ David C. Neu</u> Michael J. Gearin, WSBA #20982 David C. Neu, WSBA #33143 Brian T. Peterson, WSBA #42088 Attorneys for Mark Calvert, Chapter 11 Trustee

EX PARTE MOTION FOR SUBPOENA PURSUANT TO RULES 2004 AND 9016 - 2 K:22070561\00001\20347_DCN\20347A28JI

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	Case 16-11767-CMA	Doc 323	Filed 05/27/16	Ent. 05/27/16 14:26:03	Pg. 2 of 3
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1					
2	EXHIBIT A				
3	DOCUMENTS TO BE PRODUCED				
4	1. All documents (including emails or other electronic communications) referring-to,				
5	related-to, or evidencing agreements between Michael Parish and Ross B. Hansen regarding loans,				
6	gifts, or payments of obligations.				
7	2. All documents (including emails or other electronic communications) referring-to,				
8	related-to, or evidencing payments made by Michael Parish on behalf of Ross B. Hansen or Diane				
9	Erdmann.				
10	3. All documents (including emails or other electronic communications) referring-to,				
11	related-to, or evidencing transfers or cash, precious metals, coins, or other assets by Ross B. Hansen				
12	to Michael Parish.				
13	4. All documents (including emails or other electronic communications) referring-to,				
14	related-to, or evidencing transfers or cash, precious metals, coins, or other assets by Diane Erdman				
15	to Michael Parish.				
16	5. All documents (including emails or other electronic communications) referring-to,				
17	related-to, or evidencing transfers or cash, precious metals, coins, or other assets by Northwest				
18	Territorial Mint, LLC to Michael Parish.				
19	6. All documents (including emails or other electronic communications) referring-to, or				
20	related-to Northwest Territorial Mint, LLC.				
21					
22					
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	EX PARTE MOTION FOR SUBPOENA PURSUANT TO RULES 2004 AND 9016 - 3 K:2070561\00001\20347_DCN\20347_A28JJ EX PARTE MOTION FOR SUBPOENA K:2070561\00001\20347_DCN\20347A28JJ EX PARTE MOTION FOR SUBPOENA Set Carter of the set of th				
	Case 16-11767-CMA Doc 323 Filed 05/27/16 Ent. 05/27/16 14:26:03 Pg. 3 of 3				