1	Michael J. Gearin, wsba # 20982 David C. Neu, wsba # 33143	Honorable Christopher M. Alston
2	Brian T. Peterson, wsbA # 42088 K&L GATES LLP	Chapter 11 Ex Parte
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4	(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		
11	NORTHWEST TERRITORIAL MINT, LLC,	EX PARTE MOTION FOR EXAMINATION OF OLYMPIC
12		TRADING CORPORATION PURSUANT TO RULE 2004 AND SUBPOENAS
13		PURSUANT TO RULE 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 Olympic Trading Corporation pursuant to Federal Rules of	
18	Bankruptcy Procedure 2004(b) and (c).	
19	1. On April 1, 2016, NWTM filed	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 Trustee 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.	

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- 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 Michael 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 Olympic Trading Corporation and records and documents in its possession, custody or control as described in Exhibit A 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.
- 7. In addition, the Trustee seeks an order that a representative of Olympic Trading Corporation 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 /s/ David C. Neu

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

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EXHIBIT A

DOCUMENTS TO BE PRODUCED

- 1. All documents (including emails or other electronic communications) referring-to, related-to, or evidencing agreements between Olympic Trading Corporation and Ross B. Hansen regarding loans, gifts, or payments of obligations.
- All documents (including emails or other electronic communications) referring-to, related-to, or evidencing payments made by Olympic Trading Corporation on behalf of Ross B.
 Hansen or Diane Erdmann.
- 3. All documents (including emails or other electronic communications) referring-to, related-to, or evidencing transfers or cash, precious metals, coins, or other assets by Ross B. Hansen to Olympic Trading Corporation.
- 4. All documents (including emails or other electronic communications) referring-to, related-to, or evidencing transfers or cash, precious metals, coins, or other assets by Diane Erdman to Olympic Trading Corporation.
- All documents (including emails or other electronic communications) referring-to, related-to, or evidencing transfers or cash, precious metals, coins, or other assets by Northwest Territorial Mint, LLC to Olympic Trading Corporation.
- 6. All documents (including emails or other electronic communications) referring-to, or related-to Northwest Territorial Mint, LLC.

EX PARTE MOTION FOR SUBPOENA PURSUANT TO RULES 2004 AND 9016 - 3

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