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Honorable Christopher M. Alston
Chapter 11
Ex Parte

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6
7 UNITED STATES BANKRUPTCY COURT
8 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 In re:
10 NORTHWEST TERRITORIAL MINT, LLC,

Case No. 16-11767-CMA

11 *EX PARTE* MOTION FOR
12 EXAMINATION OF OLYMPIC
13 TRADING CORPORATION PURSUANT
TO RULE 2004 AND SUBPOENAS
14 PURSUANT TO RULE 9016

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 *ex parte* 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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EX PARTE MOTION FOR SUBPOENA
PURSUANT TO RULES 2004 AND 9016 - 1

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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.

2. 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.

5. 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.