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JUDGE: Christopher M. Alston
DATE: June 3, 2016
TIME: 1:30 p.m.
CHAPTER: 11
LOCATION: Seattle
RESPONSE DATE:

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

8 In re:) No. 16-11767-CMA
9 NORTHWEST TERRITORIAL MINT, LLC,) **REPLY SUPPORTING MEDALLIC**
10 Debtor.) **ART COMPANY, LLC'S MOTION**
11) **FOR ORDER UNDER**
12) **BANKRUPTCY RULE 2004 AND**
) **REQUEST FOR INSPECTION**

13 **I. REPLY SUPPORTING MOTION FOR 2004 ORDER**

14 Medalliac Art Company, LLC filed a motion requesting an order requiring the Trustee to turn
15 over records and information concerning Medalliac Art Company, LLC and for authority to take
16 depositions of two employees of the debtor. The Trustee objected on the basis that he will not allow
17 Medalliac Art Company, LLC's manager, Ross Hansen, to have access to electronically stored
18 information on the company's computer system.

20 The Trustee's objection is notably devoid of a constructive proposal to provide the requested
21 information. The aphorism, "where there is a will there is a way" is apropos here. If the Trustee
22 truly desired to cooperate with Medalliac Art Company, LLC and produce requested records, he
23 could have proposed any number of mechanisms to provide protections and accomplish the goal of
24 producing records.
25

26 **BUCKNELL STEHLIK SATO & STUBNER, LLP**
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28 Reply Supporting Medalliac Art Company, LLC's Motion for Seattle, Washington 98121
Order Under Bankruptcy Rule 2004 and Request for Inspection - 1 (206) 587-0144 • fax (206) 587-0277

1 Medallic Art Company, LLC proposes that the Court direct the chief accountant for the
2 debtor, Annette Trunkett, to review the debtor's accounting records and produce any and all records
3 that pertain to or reference Medallic Art Company, LLC including any sales of Medallic Art
4 Company, LLC branded product or products that bear Medallic Art Company, LLC's name, logo or
5 trademark. Ms. Trunkett is the custodian of the debtor's accounting records and ought to be able to
6 accomplish this with relative ease. Similarly, Medallic Art Company, LLC asks that the Court direct
7 the custodian of records previously maintained by Maura Richardson, a legal assistant, to conduct a
8 similar search and produce any and all records that reference or pertain to Medallic Art Company,
9 LLC. Further, Medallic Art Company, LLC proposes that Mr. Hansen be allowed to enter his office
10 under supervision by an independent third party, security personnel employed by the debtor, or some
11 combination of the foregoing so that he has an opportunity to search the physical files in his office
12 for Medallic Art Company, LLC business records and once the search is conducted he will present
13 the material he wants copied to the appropriate person in attendance so that all parties are aware of
14 what documents are being copied. Of course, copying can be done by any independent third party
15 vendor such as Baluster or Lighthouse document services. Should Medallic Art Company, LLC not
16 receive complete production it should be able to take depositions of the records custodians to
17 determine what has not been produced and why.
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21 II. REQUEST FOR PERMISSION TO INSPECT SOLD PROPERTY

22 In light of the approval of the sale of the Graco assets, Medallic Art Company, LLC makes
23 an additional request. Medallic Art Company, LLC asks that the Court grant it permission to
24 physically inspect and catalogue the items of property being sold to Ira Green so it can document
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26

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28 Order Under Bankruptcy Rule 2004 and Request for Inspection - 2

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1 precisely what items in which Medallie Art Company, LLC claims ownership. This must be done
2 prior to the packaging and shipping of the assets which means that the inspection will have to take
3 place early next week assuming that the purchaser will be moving quickly to vacate the Tomball,
4 Texas premises. Of course, management or security personnel would accompany Medallie Art
5 Company, LLC's representative throughout the inspection.
6

7 Respectfully submitted,

8 DATED this 1st day of June, 2016.

9 BUCKNELL STEHLIK SATO & STUBNER, LLP

10
11 /s/ Jerry N. Stehlik
12 Jerry N. Stehlik, WSBA #13050
13 of Attorneys for Medallie Art Company, LLC
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27 Reply Supporting Medallie Art Company, LLC's Motion for
28 Order Under Bankruptcy Rule 2004 and Request for Inspection - 3

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