

Hon. Christopher M. Alston
Chapter: 11
Hearing Date: June 3, 2016
Hearing Time: 1:30 p.m.
Hearing Location: Courtroom 7206

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re: NORTHWEST TERRITORIAL MINT, LLC, Debtor.	NO. 16-11767-CMA IRA GREEN'S LIMITED RESPONSE TO MEDALLIC ART COMPANY LLC'S REQUEST FOR INSPECTION
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Ira Green, Inc. (“IG”) files this limited response to the request of Medalliac Art Company LLC (“Medalliac”) because a third-party physical inspection would be unnecessarily burdensome for several reasons.

IG is the court-approved successful bidder who purchased the Debtor’s Tomball, Texas assets. Medalliac, an LLC owned in part by the Debtor’s ex-principal, Ross Hansen, moved *ex parte* to compel production of certain documents in the Debtor’s possession. ECF No. 284. The Trustee objected. ECF No. 319. In reply to the Trustee’s objection, Medalliac, for the first time, and without any formal notice to IG, requested a Court order authorizing Medalliac to physically inspect the assets IG purchased from the estate. ECF No. 359. Medalliac’s stated purpose is to

IRA GREEN'S LIMITED RESPONSE
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CAIRNCROSS & HEMPELMANN, P.S.
ATTORNEYS AT LAW
524 Second Avenue, Suite 500
Seattle, Washington 98104-2323
office 206 587 0700 fax 206 587 2308

1 catalogue all assets onsite so that it may 'document precisely' which assets it 'claims ownership'
2 of. ECF No. 359 at 2-3.

3 IG is willing to provide reasonable cooperation and to provide transparency regarding
4 the purchased assets. However, providing transparency and accommodating a burdensome
5 request are two different things. Because the Tomball facility is expansive and because IG will
6 be moving swiftly with a contracted transition staff to wind-down operations, a Medallic
7 representative would create an unreasonable burden, result in interference and delay, and cost IG
8 more in transition expenses.¹

9 Medallic need not be physically present in order achieve its stated goal. IG intends to
10 inventory the assets for its own purposes during the transition. IG can make this ledger available
11 to the Trustee and Medallic, so long as any appropriate protective orders are entered by this
12 Court.²

13 For the reasons above, plus for such other reasons as may be raised at the time of the
14 hearing on this matter, Ira Green, Inc. objects to the request of Medallic unless the parameters set
15 forth above are approved by this Court.

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17 RESPECTFULLY SUBMITTED this 2nd day of June, 2016.

18 CAIRNCROSS & HEMPELMANN, P.S.

19
20 /s/ John R. Rizzardi

21 John R. Rizzardi WSBA No. 9388

22 E-mail: jrizzardi@cairncross.com

23 524 Second Avenue, Suite 500

24 Seattle, WA 98104-2323

Attorney for Ira Green, Inc.

25 ¹ IG has already been forced by this request to incur several hours of legal fee expenses and the attention of its
management to addressing this issue.

26 ² IG is not requesting a protective order at this juncture. If, however, IG believes information in a written inventory
needs to be protected, it would make an application to this Court for such a protective order.