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**UNITED STATES BANKRUPTCY COURT  
OF WESTERN WASHINGTON  
AT SEATTLE**

IN RE  
  
NORTHWEST TERRITORIAL MINT  
LLC,  
  
Debtor.

NO. 16-11767-CMA  
  
Chapter 11  
  
COHEN'S RESPONSE TO DIANE  
ERDMANN'S MOTION TO  
DETERMINE APPLICABILITY OF  
AUTOMATIC STAY

To the extent the Trustee asserts that any or a portion of the Seized Property constitutes property of the bankruptcy estate, Bradley Cohen and Cohen Asset Management Inc. ("Cohen") does not object to the application of the automatic stay to the Seized Property. However, the only issue the Bankruptcy Court needs to address and decide with respect to the Seized Property is whether the Seized Property constitutes property of the Estate (a proceeding to which Cohen is not a party and will not participate). If this Court determines that all of the Seized Property is property of the Estate, there is nothing more for the state court to address. If this Court decides that any portion of the Seized Property is not property of the Estate, then the state court is the proper court to decide ownership claims to the non-Estate

COHEN'S RESPONSE TO DIANE  
ERDMANN'S MOTION TO  
DETERMINE APPLICABILITY OF  
AUTOMATIC STAY - 1

**MONTGOMERY PURDUE BLANKINSHIP & AUSTIN PLLC**  
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MPBA{17065/006/01163168-1}

1 property, including but not limited to the claim by Cohen that the Seized Property that  
2 Erdman contends is her property is actually the property of Ross Hansen. Cohen is  
3 not a party to this bankruptcy proceeding, and is not a party to any adversary  
4 proceeding in which title to the Seized Property is at issue. Cohen has an interest to  
5 litigate with respect to the Seized Property only if it is determined by this Court not to  
6 be property of the Estate—which interest at that point involves only non-debtors, and  
7 properly should be decided in the state court.

8 The Court should also specify that the automatic stay does not apply to any of  
9 Cohen’s collection efforts against assets that are not property of the bankruptcy  
10 Estate such as the property of Mr. Hansen. Cohen’s state court collection efforts  
11 should not be categorically stayed.

12 DATED this 10<sup>th</sup> day of June, 2016.

13  
14 MONTGOMERY PURDUE BLANKINSHIP  
& AUSTIN PLLC

15  
16 By: /s/ Joseph A. Hamell  
Michael E. Gossler  
WA State Bar No. 11044  
Joseph A. Hamell  
WA State Bar No. 29423  
Attorneys for Bradley S. Cohen and  
Cohen Asset Management, Inc.

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COHEN’S RESPONSE TO DIANE  
ERDMANN’S MOTION TO  
DETERMINE APPLICABILITY OF  
AUTOMATIC STAY - 2

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**CERTIFICATE OF SERVICE**

The undersigned certifies under penalty of perjury under the laws of the State of Washington that I am, and at all times herein mentioned have been, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above-mentioned action, and competent to be a witness herein.

On the date written below, I caused the above document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the persons who have requested such notice.

DATED this 10<sup>th</sup> day of June, 2016, at Seattle, Washington.

/s/ Mary O'Hara  
\_\_\_\_\_  
Mary O'Hara