



1 parties in this matter respecting personal and real property interests in property or assets claimed to  
2 be property of the Debtor, as well as the negotiation, drafting and execution of purchase agreements  
3 and/or lease agreements and related relationships between Medallic and other interested parties  
4 herein, including the Debtor.

5 Bankruptcy Rule 2004 authorizes the Court to order the examination of any entity, including  
6 the Debtor, and to compel the production of relevant documents. The scope of the examination  
7 authorized by Rule 2004 is exceedingly broad, including matters relating to "the acts, conduct, or  
8 property or to the liabilities and financial condition of the debtor, or to any matter which may affect  
9 the administration of the debtor's estate, or to the debtor's right to a discharge." Further, in cases  
10 under Chapter 11 of the Code, the examination  
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12 may also relate to the operation of any business and the desirability of its  
13 continuance, the source of any money or property acquired or to be acquired by the  
14 debtor for purposes of consummating a plan and the consideration given or offered  
15 therefore, and *any other matter relevant to the case* or to the formulation of a plan.

16 Rule 2004(b). (Emphasis added.) Attendance at a deposition or the production of documents must  
17 be compelled by subpoena, pursuant to Rule 9016 and Federal Rule of Civil Procedure 45. Rule  
18 2004(c).

19 Medallic's proposed discovery falls clearly within the scope of discovery authorized by Rule  
20 2004. The Debtor claims that both the leasehold interest of and certain personal property assets  
21 located on the Leased Premises are property of the Debtor. Medallic contends that both the  
22 leasehold interest and the property located thereon belong to Medallic or its owners.  
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24 The law firm of Allison MacKenzie Ltd. represented Mr. Hansen, Mr. Bressler and/or  
25 Medallic (or affiliates thereof) in preparing the instruments by which the disputed real and personal  
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27 Medallic Art Company LLC Application for Order  
28 Authorizing Rule 2004 Discovery - 2

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1 property interests were acquired and thereafter handled and such files are believed to contain other  
2 documentary evidence relevant to the parties' claimed ownership and interest, intent of the lessor,  
3 lessee, purchaser and other parties, as well as other matters pertinent to this bankruptcy case.

4 For the reasons stated above, Medallic respectfully requests that the Court order the  
5 requested discovery under Rule 2004. A proposed order, along with Exhibit A to the intended  
6 document subpoena describing the documents to be produced, is submitted herewith.  
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8 DATED this 21st day of June 2016.

9 BUCKNELL STEHLIK & SATO, LLP

10  
11 /s/ Jerry N. Stehlik  
12 Jerry N. Stehlik, WSBA #13050  
13 of Attorneys for Medallic Art Company, LLC  
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