



1 by the Hoff family—as well as the real estate that housed its operations. Ultimately, Medallic  
2 purchased the assets of Medallic Art Company, Ltd. and Ross Hansen, individually, *leased* the real  
3 property from Medallic Art Company, Ltd. It is apparent that Allison MacKenzie represented the  
4 Hansen/Bressler interests in the purchase of the Medallic Art Company Ltd. assets from the Hoff  
5 family. For instance, in the July 2009 Lease Agreement between Medallic Art Company, Ltd. and  
6 Hansen as Tenant (herein "the Lease"), the designated party and address for legal notices to  
7 Mr. Hansen as Tenant was Allison MacKenzie and Mr. Patrick Fagan, a partner of the firm.  
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9 3. The files of Allison MacKenzie are essential in this matter because the parties lack  
10 full and complete copies of important organizational and transactional documents for the Medallic  
11 Affiliates, including but not limited to records relating to the Lease between Medallic Art Company,  
12 Ltd. and Hansen, and Medallic's associated purchase of the assets of the Hoff's Company (Medallic  
13 Art Company, Ltd.). Further Allison MacKenzie's files are likely to bear on or reveal the intent of  
14 the parties, and/or ownership of property as between Debtor, Medallic, and Hansen. Medallic has no  
15 interest in Allison MacKenzie files regarding the employment matter referenced in the Trustee's  
16 response and is amenable to the clear exclusion of the same from the scope of the subpoena.  
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19 4. I have made a diligent effort to obtain files from Allison MacKenzie regarding  
20 representation of Hansen, and or the Medallic Affiliates. I spoke with Mr. Fagan by telephone on  
21 May 6, 2016 at which time I confirmed that he and his firm represented Hansen/Medallic Art  
22 Company in the Lease and possibly the sale. Mr. Fagan said he would follow up to see what records  
23 they had. I sent a follow-up email to Mr. Fagan on June 6, 2016 reiterating my request, a copy of  
24 which is attached. In response, Mr. Fagan indicated he had asked Allison MacKenzie to conduct a  
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1 search and that he would report back. Neither Mr. Fagan nor Allison MacKenzie have follow-up  
2 with a substantive response.

3 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
4 knowledge and information.

5 DATED this 28<sup>th</sup> day of June, 2016.

6  
7 /s/ Jerry N. Stehlik  
8 Jerry N. Stehlik

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27 Declaration of Jerry N. Stehlik re Medallic Art Company LLC's  
28 Motion for Order Authorizing 2004 Discovery - 3

**BUCKNELL STEHLIK & SATO, LLP**  
2003 Western Avenue, Suite 400  
Seattle, Washington 98121  
(206) 587-0144 • fax (206) 587-0277