1	BUCKNELL STEHLIK & SATO, LLP	JUDGE: DATE:	Christopher M. Alston July 22, 2016		
2	2003 Western Avenue, Suite 400 Seattle, Washington 98121	TIME:	9:30 a.m. 11		
3	(206) 587-0144 • fax (206) 587-0277	LOCATION: RESPONSE D	Seattle ATE: July 15, 2016		
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5					
6	UNITED STATES BANKRUPTCY COURT				
7	WESTERN DISTRICT OF V	VASHINGTON, A	AT SEATTLE		
8	In re:) No. 16-117	767-CMA		
9	NORTHWEST TERRITORIAL MINT, LLC,	′	ATION OF JERRY N.		
10	Debtor.) MEDALL	X IN SUPPORT OF JIC ART COMPANY		
11		,	X PARTE APPLICATION DER AUTHORIZING		
12		,	ERY PURSUANT TO PTCY RULE 2004		
13) Dirivinic	TICT ROLL 2004		
14	Jerry N. Stehlik declares as follows:				
15	1. I am a partner in Bucknell Stehlik & Sato, LLP ("BSS"). I am over the age of 18 and				
16	I am competent to testify to the contents of this declaration. I make this declaration in support of				
17	Medallic Art Company, LLC'S Ex Parte Application for Order Authorizing Discovery Pursuant to				
18 19	Bankruptcy Rule 2004, and specifically, a subpoena duces tecum to be issued to Allison MacKenzie,				
20	Ltd. ("Allison MacKenzie")				
21	2. BSS represents Medallic Art Com	pany, LLC ("Meda	allic"), which is owned 50/50 by		
22	Ross Hansen and Richard Bressler. Allison MacKenzie was retained by and provided services to				
23	Medallic, Hansen and Bressler, and Medallic Art Limited Partnership, which limited partnership was				
24	•				
25	created specifically for the purpose of acquiring the assets of Medallic Art Company, Ltd.—owned				
26		В	UCKNELL STEHLIK & SATO, LLP		
27	Declaration of Jerry N. Stehlik re Medallic Art Company L		2003 Western Avenue, Suite 400 Seattle, Washington 98121		
28	Motion for Order Authorizing 2004 Discovery - 1		(206) 587-0144 • fax (206) 587-0277		

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, <i>leased</i> 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 7	Hansen as Tenant (herein "the Lease"), the designated party and address for legal notices to
8	Mr. Hansen as Tenant was Allison MacKenzie and Mr. Patrick Fagan, a partner of the firm.
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,
1213	Ltd. and Hansen, and Medallic's associated purchase of the assets of the Hoff's Company (Medallic
14	Art Company, Ltd.). Further Allison MacKenzie's files are likely to bear on or reveal the intent of
15	the parties, and/or ownership of property as between Debtor, Medallic, and Hansen. Medallic has no
16	interest in Allison MacKenzie files regarding the employment matter referenced in the Trustee's
17	response and is amenable to the clear exclusion of the same from the scope of the subpoena.
18 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
2324	they had. I sent a follow-up email to Mr. Fagan on June 6, 2016 reiterating my request, a copy of
2 4	which is attached. In response, Mr. Fagan indicated he had asked Allison MacKenzie to conduct a

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Declaration of Jerry N. Stehlik re Medallic Art Company LLC's
Motion for Order Authorizing 2004 Discovery - 2

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 th day of June, 2016.				
6	211122 uno 20 uny orount, 2010.				
7	/s/ Jerry N. Stennk				
8	Jerry N. Stehlik				
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27	Declaration of Jerry N. Stehlik re Medallic Art Company LLC's Motion for Order Authorizing 2004 Discovery - 3 Seattle, Washington 98121 (206) 587-0144 • fax (206) 587-027	7			