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Honorable Christopher M. Alston
Chapter 11
Ex Parte

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6
7 UNITED STATES BANKRUPTCY COURT
8 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 In re:
10 NORTHWEST TERRITORIAL MINT, LLC,
11
12 Debtor.

Case No. 16-11767-CMA

**EX PARTE MOTION TO EXTEND
FILING OF SCHEDULES AND
STATEMENT OF FINANCIAL
AFFAIRS DEADLINE**

13
14 Mark Calvert, the Chapter 11 Trustee (the “Trustee”), files this *ex parte* motion to extend the
15 deadline for the filing of bankruptcy schedules and statement of financial affairs for Northwest
16 Territorial Mint, LLC (the “Debtor”).

17 In support of this motion, the Trustee states as follows:

- 18 1. On April 1, 2016, the Debtor filed a voluntary bankruptcy petition under Chapter 11
19 of Title 11 of the United States Code.
- 20 2. An order approving the appointment of Mark Thomas Calvert as Chapter 11 Trustee
21 was entered on April 11, 2016.
- 22 3. The deadline for the filing of the Debtor’s bankruptcy schedules and statements (the
23 “Schedules and Statements”) is currently April 18, 2016. The Trustee has learned that the Debtor
24 does not have regularly prepared financial statements. The Trustee further understands that the
25 Debtor’s counsel has partially prepared the schedules, but that considerable work remains to be done
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EX PARTE MOTION TO EXTEND FILING OF
SCHEDULES AND STATEMENT OF FINANCIAL
AFFAIRS DEADLINE - 1

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1 to finalize them. As the Trustee has recently been appointed for the Debtor, the Trustee requests that
2 the deadline for filing the Schedules and Statements be extended by sixty days to June 10, 2016 to
3 allow sufficient time to prepare these documents.

4
5 DATED this 12th day of April, 2016.

6
7
8 K&L GATES LLP

9
10 By /s/ Michael J. Gearin
11 Michael J. Gearin, WSBA #20982
12 David C. Neu, WSBA #33143
13 Brian T. Peterson, WSBA #42088
14 Attorneys for Mark Calvert, Chapter 11 Trustee
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EX PARTE MOTION TO EXTEND FILING OF
SCHEDULES AND STATEMENT OF FINANCIAL
AFFAIRS DEADLINE - 2

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CERTIFICATE OF SERVICE

The undersigned declares as follows:

That she is a paralegal in the law firm of K&L Gates LLP, and on April 12, 2016, she caused the foregoing document to be filed electronically through the CM/ECF system which caused Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic Filing.

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

Executed on the 12th day of April, 2016 at Seattle, Washington.

/s/ Denise A. Evans
Denise A. Evans