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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

**DECLARATION OF MICHAEL J.  
GEARIN IN SUPPORT OF *EX  
PARTE* MOTION TO EXTEND  
FILING OF SCHEDULES AND  
STATEMENT OF FINANCIAL  
AFFAIRS DEADLINE**

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15 I, Michael J. Gearin, declare as follows:

16 1. I am an attorney at law admitted to practice before this Court and am a member of the  
17 law firm K&L Gates LLP, with an office at 925 Fourth Avenue, Suite 2900, Seattle, Washington  
18 98107. I have personal knowledge of the facts set forth herein, and I am competent to testify to the  
19 same.

20 2. On April 1, 2016, Northwest Territorial Mint, LLC (the "Debtor") filed a voluntary  
21 bankruptcy petition under Chapter 11 of Title 11 of the United States Code..

22 3. An order approving the appointment of Mark Thomas Calvert as Chapter 11 Trustee  
23 was entered on April 11, 2016.

24 4. The deadline for the filing of the Debtor's bankruptcy schedules and statements (the  
25 "Schedules and Statements") is currently April 18, 2016. The Trustee has informed me that the  
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DECLARATION IN SUPPORT OF *EX PARTE* MOTION  
TO EXTEND FILING OF SCHEDULES AND  
STATEMENT OF FINANCIAL AFFAIRS DEADLINE - 1

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1 Debtor does not have regularly prepared financial statements. Further, Debtor's counsel has  
2 informed me that counsel has partially prepared the schedules, but that considerable work remains to  
3 be done to finalize them. As the Trustee has recently been appointed for the Debtor, the Trustee has  
4 informed me that he requests that the deadline for filing the Schedules and Statements be extended  
5 by sixty days to June 10, 2016 to allow sufficient time to prepare these documents.

6 EXECUTED this 12th day of April, 2016, at Seattle, Washington.

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/s/ Michael J. Gearin  
Michael J. Gearin

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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