1 2 3 4 5 6 7 8 UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 In re: Case No. 16-11767-CMA 11 NORTHWEST TERRITORIAL MINT, LLC, REPLY DECLARATION OF CONNIE HOFF REGARDING MOTION FOR 12 Debtor. ORDER HOLDING ROSS HANSEN IN 13 CONTEMPT FOR VIOLATION OF AUTOMATIC STAY 14 15 I, Connie Hoff, hereby declare as follows: 16 I submit this Declaration at the request of the Chapter 11 Trustee's Motion for Order 17 Holding Ross Hansen in Contempt for Violation of the Automatic Stay (the "Motion"). I am over 18 eighteen (18) years of age and I am competent in all ways to testify. 19 2. My husband and I formerly owned the stock of Medallic Art Company, LTD, a South Dakota corporation ("MACO"), which operated a custom minting business at 80 Airpark 20 Vista Boulevard, Dayton, Nevada (the "Dayton Premises") prior to July, 2009. MACO entered into 21 22 an asset purchase and sale agreement (the "MACO APA") for the sale of tangible and intangible assets of MACO which closed on July 9, 2009. The sale did not include the real property at the 23

REPLY DECLARATION OF CONNIE HOFF REGARDING MOTION FOR ORDER HOLDING ROSS HANSEN IN CONTEMPT FOR VIOLATION OF AUTOMATIC STAY - I

Dayton Premises, which I presently own with my husband.

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MACO has always maintained a specimen archive (the "Archive") containing each

medal manufactured since the early 1900's.. The Archive included items produced by MACO and items that MACO had acquired from prior owners of Medallic. I am familiar with the contents of the Archive prior to the sale of MACO.

4. Recently, the Trustee asked me to inspect the contents of six boxes located at the Dayton facility that he told me were shipped to Dayton from the NWTM offices in Federal Way, Washington in early April, 2016. The Trustee has informed me that Ross Hansen claims that the contents of the six boxes were property of Medallic Art Company LLC and that the contents belong in the Archive. Based on my review of the contents of the six boxes, the medals in the six boxes did not belong to the MACO Archives at the time of the sale of the MACO assets in July 9, 2009. Based upon looking at the edge of the medals, the medals did not appear to be archived medals since they do not bear the markings that would be consistent with archive medals created before July 2009. Most of the Medallic medals appeared to be older medals that were manufactured in New York or Danbury Conn. This would indicate they were minted sometime before the 1990's and therefore I am confident that they were not part of the archive collection in July of 2009.

I declare under penalty of perjury that the foregoing is true and correct. EXECUTED this 2nd day of August 2016, at Dayton, Nevada.

Connie Hoff

REPLY DECLARATION OF CONNIE HOFF REGARDING MOTION FOR ORDER HOLDING ROSS HANSEN IN CONTEMPT FOR VIOLATION OF AUTOMATIC STAY - 2

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CERTIFICATE OF SERVICE

The undersigned declares as follows:

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That she is a paralegal in the law firm of K&L Gates LLP, and on August 2, 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 2nd day of August, 2016 at Seattle, Washington.

/s/ Denise A. Evans
Denise A. Evans

REPLY DECLARATION OF CONNIE HOFF IN SUPPORT OF MOTION FOR ORDER HOLDING ROSS HANSEN IN CONTEMPT FOR VIOLATION OF AUTOMATIC STAY - 3

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