

1 Michael J. Gearin, WSBA # 20982  
2 David C. Neu, WSBA # 33143  
3 Brian T. Peterson, WSBA # 42088  
4 K&L GATES LLP  
5 925 Fourth Avenue, Suite 2900  
6 Seattle, WA 98104-1158  
7 (206) 623-7580

Honorable Christopher M. Alston  
Chapter 11  
Hearing Location: Rm. 7206  
Hearing Date: August 5, 2016  
Hearing Time: 9:30 a.m.  
Response Date: July 29, 2016

8 UNITED STATES BANKRUPTCY COURT  
9 WESTERN DISTRICT OF WASHINGTON  
10 AT SEATTLE

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

Case No. 16-11767-CMA

**TRUSTEE'S MOTION TO STRIKE  
SUPPLEMENTAL MEMORANDUM FILED  
BY ROSS HANSEN**

14 Mark Calvert (the "Trustee"), Chapter 11 Trustee for Northwest Territorial Mint, LLC  
15 ("NWTM" or the "Debtor"), files this motion to strike Ross Hansen's Supplemental Memorandum  
16 in Reponse to Motion for Contempt (Dkt. No. 569) ("Supplemental Response").

17 LBR 9013-1(d)(8) requires that memoranda filed in response to a motion be filed a week  
18 before the scheduled hearing on the motion. Therefore, Ross Hansen's deadline to file any  
19 responsive pleadings was last Friday, July 29, 2016. Hansen justifies filing his supplemental  
20 response after the deadline by asserting that the Trustee refused to continue his Motion for Contempt  
21 until after Hansen had the opportunity to depose the Trustee and employees who filed supporting  
22 declarations. As set forth in the Declaration of Michael J. Gearin (Dkt. No. 576), Hansen *did* have  
23 the opportunity to depose witnesses prior to the response deadline. Furthermore, the Trustee has  
24 already accomodated a request for continuance by Hansen.

25 In addition to being untimely, Mr. Hansen's Supplemental response, when combined with the  
26 response he already filed on July 9, 2016, exceeds the permitted page length for a response under the

TRUSTEE'S MOTION TO STRIKE ROSS HANSEN'S  
SUPPLEMENTAL RESPONSE - 1

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K&L GATES LLP  
925 FOURTH AVENUE  
SUITE 2900  
SEATTLE, WASHINGTON 98104-1158  
TELEPHONE: (206) 623-7580  
FACSIMILE: (206) 623-7022

1 local rules. LBR 9013-1(d)(1)(C) provides that Ross Hansen’s responsive memoranda may not  
2 exceed 12 pages in length. Mr. Hansen’s first response was 9 pages in length and his Supplemental  
3 Response is an additional 5 pages.

4 For the foregoing reasons, the Court should strike Ross Hansen’s Supplemental Response. If  
5 the Court denies this Motion to Strike, the Trustee wishes to identify for the Court one patently  
6 misleading aspect of the Supplemental Response. The Supplemental Response suggests that  
7 Ms. Krum was afraid because she could have been fired by the Trustee for speaking with  
8 Mr. Hansen and because she was summoned to a meeting with the Trustee and the chief security  
9 officer for the company. Supplemental Response, pg. 4., ln. 14-20. This is not an accurate recitation  
10 of Ms. Krum’s testimony. In her testimony, Ms. Krum states that she was scared, not out of fear that  
11 she would be fired, but “because of what [Hansen] wanted [her] to do.” Dkt. No. 570-5, p. 46.

12 To the extent the Court denies the Motion to Strike and considers Hansen’s Supplemental  
13 Response, the Trustee will respond in greater detail to the arguments and statements contained in the  
14 Supplemental Response at the time of the hearing.

15  
16 DATED this 3rd day of August, 2016.

17 K&L GATES LLP

18 By /s/ Michael J. Gearin

19 Michael J. Gearin, WSBA #20982

20 David C. Neu, WSBA #33143

21 Brian T. Peterson, WSBA #42088

22 Attorneys for Mark Calvert, Chapter 11 Trustee  
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**CERTIFICATE OF SERVICE**

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The undersigned declares as follows:

That she is a practice assistant in the law firm of K&L Gates LLP, and on August 3, 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 3rd day of August, 2016 at Seattle, Washington.

/s/ Denise A. Evans  
Denise A. Evans