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Honorable Christopher M. Alston  
Chapter 11  
*Ex Parte*

5  
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* APPLICATION FOR  
ORDER AUTHORIZING  
EMPLOYMENT OF CASCADE  
CAPITAL GROUP, LLC AS  
ACCOUNTANTS FOR TRUSTEE ON  
AN INTERIM BASIS

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15 Mark Calvert, the Chapter 11 Trustee (the "Trustee"), files this ex parte motion to employ, on  
16 an interim basis, Cascade Capital Group, LLC ("Cascade") as accountants for the estate pursuant to  
17 11 U.S.C. § 327. 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. Since his appointment as Chapter 11 Trustee of the Debtor, the Trustee has conducted  
23 a review of certain books and records of the Debtor, and has determined that the Debtor has not  
24 completed financial statements since 2011. It is necessary for the Trustee to hire an accountant to  
25 provide financial accounting services for the estate. The Trustee also believes that it may be  
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*EX PARTE* APPLICATION FOR ORDER AUTHORIZING  
EMPLOYMENT OF CASCADE CAPITAL GROUP, LLC  
AS ACCOUNTANTS FOR TRUSTEE ON AN INTERIM  
BASIS - 1

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1 necessary to conduct forensic accounting services related to the Trustee's investigation of certain  
2 transactions engaged in by the Debtor. Cascade has the capability and experience to provide both  
3 financial accounting and forensic accounting services.

4 4. Mark Calvert is a principal of Cascade. Tod McDonald and Charles Green will also  
5 provide accounting services required in these proceedings. Mark Calvert is a Certified Public  
6 Accountant, Certified Turnaround Professional, and Certified Insolvency and Restructuring Advisor.  
7 Mark Calvert was certified as a fraud examiner in 2002. Tod McDonald is a Certified Public  
8 Accountant and Certified Insolvency and Restructuring Advisor. .

9 5. Cascade will charge its usual hourly rates for any services rendered and will request  
10 reimbursement of costs and expenses incurred by them in connection with its services for the estate.  
11 The following individuals are likely to render the majority of services to the estate:

<u>Professional</u>	<u>Hourly Rate</u>
Mark Calvert	\$400
Charles Green	\$350
Tod McDonald	\$350
Jody Cannady	\$180
Senior Staff	\$120
Staff	\$100

17 6. The Trustee seeks approval of the employment of Cascade pursuant to 11 U.S.C. §§  
18 327 and 330, which allows the Trustee to employ professionals if the Court determines that there is  
19 no actual conflict of interest or inappropriate appearance of a conflict. Pursuant to 11 U.S.C. §  
20 327(d), the Court may permit the Trustee to act as account for the estates if it is in the best interest of  
21 the estate and creditors.

22 7. Based on the Declaration of Mark Calvert filed concurrently herewith, the Trustee is  
23 aware of no conflicts between Cascade and the Debtors, creditors, any party in interest, their  
24 respective attorneys and accountants, the United States Trustee, or any person employed in the office  
25 of the United States Trustee.

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*EX PARTE* APPLICATION FOR ORDER AUTHORIZING  
EMPLOYMENT OF CASCADE CAPITAL GROUP, LLC  
AS ACCOUNTANTS FOR TRUSTEE ON AN INTERIM  
BASIS - 2

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1           8.       As described in the Declaration of Mark Calvert filed in support of this Motion and  
2 the previously filed Chapter 11 Trustee's Acceptance and Declaration [Dkt. No. 48-1], prior to the  
3 filing of the bankruptcy case, Mark Calvert met with representatives of the Debtor to discuss  
4 whether Cascade would be engaged to provide restructuring services to the Debtor. Mr. Calvert met  
5 with the Debtor's principal, Ross Hansen. After meeting with Mr. Hansen, Cascade declined to  
6 undertake the engagement. Neither Mark Calvert nor his firm was paid any fees by the Debtor or  
7 Ross Hansen. Neither Cascade nor Mark Calvert has any relationship with the Debtor or  
8 Mr. Hansen.

9           9.       No notice to creditors or interested parties of this motion is necessary pursuant to 11  
10 U.S.C. § 102(1) and Fed. R. Bankr. P. 2002.

11           10.       Employment is sought *nunc pro tunc* effective as of April 11, 2016.

12           11.       Based on the above, the Trustee applies to the Court for an order authorizing the  
13 employment of Cascade, on an interim basis, as forensic accountants for the estate as described in  
14 this application.

15                   DATED this 13th day of April, 2016.

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18                   K&L GATES LLP

19  
20                   By /s/ Michael J. Gearin  
21                   Michael J. Gearin, WSBA #20982  
22                   David C. Neu, WSBA #33143  
23                   Brian T. Peterson, WSBA #42088  
24                   Attorneys for Mark Calvert, Chapter 11 Trustee  
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EX PARTE APPLICATION FOR ORDER AUTHORIZING  
EMPLOYMENT OF CASCADE CAPITAL GROUP, LLC  
AS ACCOUNTANTS FOR TRUSTEE ON AN INTERIM  
BASIS - 3

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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 13, 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 13th day of April, 2016 at Seattle, Washington.

/s/ Denise A. Evans  
Denise A. Evans

EX PARTE APPLICATION FOR ORDER AUTHORIZING  
EMPLOYMENT OF CASCADE CAPITAL GROUP, LLC  
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BASIS - 4

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