Michael J. Gearin, wsba # 20982 David C. Neu, wsba # 33143 Brian T. Peterson, wsba # 42088 K&L GATES LLP 925 Fourth Avenue, Suite 2900 Seattle, WA 98104-1158 (206) 623-7580

UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:

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NORTHWEST TERRITORIAL MINT, LLC,

Debtor.

Case No. 16-11767-CMA

SUPPLEMENTAL DECLARATION OF MATTHEW LEE IN SUPPORT OF MOTION FOR ORDER GRANTING AUTHORITY TO RETURN STORED INVENTORY, OTHER CUSTOMER OWNED INVENTORY, AND COINING DIES

I, Matthew Lee, hereby declare as follows:

- 1. I submit this Declaration in support of the Trustee's Motion for Order Granting Authority to Return Stored Inventory, Other Customer Owned Inventory, and Coining Dies (the "Motion"). I am over eighteen (18) years of age, and I am competent in all ways to testify.
- 2. I am a security lead at Northwest Territorial Mint, LLC ("NWTM" or the "Debtor") in Dayton, Nevada. On August 15, 2016 I took photographs of inventory located at the Debtor's facilities in Dayton, Nevada of the stored inventory property identified as belonging to Daphne Blanchard. Digital images of the photographs I took were provided to Christine Unwin of Cascade Capital Group, LLC.

SUPPLEMENTAL DECLARATION OF MATTHEW LEE IN SUPPORT OF MOTION FOR ORDER GRANTING AUTHORITY TO RETURN STORED INVENTORY, OTHER CUSTOMER OWNED INVENTORY, AND COINING DIES - 1

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K&L GATES LLP 925 FOURTH AVENUE SUITE 2000 SEATTLE, WASHINGTON 98104-1158 TELEPHONE: (206) 623-7380 FACSIMILE: (206) 623-7022

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 16th day of August, 2016, at Seattle, Washington.

SUPPLEMENTAL DECLARATION OF MATTHEW LEE IN SUPPORT OF MOTION FOR ORDER GRANTING AUTHORITY TO RETURN STORED INVENTORY, OTHER CUSTOMER OWNED INVENTORY, AND COINING DIES - 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 17, 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 17th day of August, 2016 at/Seattle, Washington.

Denise A. Evans

SUPPLEMENTAL DECLARATION OF MATTHEW LEE IN SUPPORT OF MOTION FOR ORDER GRANTING AUTHORITY TO RETURN STORED INVENTORY, OTHER CUSTOMER OWNED INVENTORY, AND COINING DIES - 3

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