The Honorable Christopher M. Alston Chapter 11 Ex Parte

## UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WASHINGTON

In re

NORTHWEST TERRITORIAL MINT, LLC

Debtor.

No. 16-11767-CMA

**EX PARTE** MOTION FOR ORDER SHORTENING TIME AND LIMITING NOTICE ON MOTION TO WITHDRAW AS ATTORNEY FOR DEBTOR

The Tracy Law Group PLLC moves this Court for an order shortening the time and limiting notice for hearing on its Motion to Withdraw as Attorney for Debtor.

Northwest Territorial Mint LLC executed an engagement letter with The Tracy Law Group on March 31, 2016. By this Court's order dated April 11, 2016, the Court approved the appointment of Mark Calvert as the Chapter 11 Trustee. The Tracy Law Group PLLC has three bases to immediately terminate its engagement with the Debtor, each of which are outlined in its Motion to Withdraw as Attorney for Debtor. Significantly, the attorney-client working relationship with the Debtor is irretrievably broken.

On April 15, 2016, The Tracy Law Group PLLC sent a letter to Northwest Territorial Mint LLC at its last known addresses and to Mr. Ross Hansen, the sole member of the Debtor terminating the engagement. However, pursuant Local Civil Rule 83.2 of the

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THE TRACY LAW GROUP, LLC

720 Olive Way, Suite 1000 Seattle, WA 98101 206-624-9894 phone / 206-624-8598 fax www.thetracylawgroup.com Local Rules W.D., as incorporated by Local Rules W.D. Wash. Bankr. 9029-2, any withdrawal and termination of the representation requires Court approval. Because the representation has been terminated, it is critical that the Court enter an order authorizing the withdrawal in order to prevent any issues under the Washington Rules of Professional Conduct.

Additionally, there is a significant issue regarding funds held in The Tracy Law Group PLLC's IOLTA trust account that requires a ruling pursuant to RPC 1.15A(g) at the earliest possible time.

The Tracy Law Group PLLC further requests, that given the enormous size of the mailing matrix in this case, notice of the hearing on the motion should be limited to the Debtor, the Chapter 11 Trustee and his Counsel, any parties on the ECF notice list and the Official Unsecured Creditors Committee.

Based on the foregoing, Debtor respectfully requests that this Court grant this *ex* parte Motion and shorten the time for hearing on the Motion to Withdraw as Attorney for Debtor to **9:30 am on Friday, April 22, 2016** and that notice of the motion be limited to the Debtor, the Chapter 11 Trustee and his Counsel, all ECF Notice Parties and the Unsecured Creditors Committee.

DATED this  $18^{th}$  day of April, 2016.

THE TRACY LAW GROUP PLLC

By /s/ J. Todd Tracy
J. Todd Tracy, WSBA #17342
Steven J. Reilly, WSBA #44306
Former Attorneys for Debtor

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