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The Honorable Christopher M. Alston
Chapter 11
Hearing Location: Seattle, WA
Hearing Date:
Hearing Time:
Response Due:

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re
NORTHWEST TERRITORIAL MINT, LLC
Debtor.

No. 16-11767-CMA
DECLARATION OF J. TODD TRACY IN
SUPPORT OF EX PARTE MOTION
SHORTENING TIME AND LIMITING
NOTICE ON MOTION TO WITHDRAW
AS ATTORNEY FOR DEBTOR

J. TODD TRACY declares as follows:

I am the member of The Tracy Law Group PLLC (“TTLG”). I am over the age of 18 and I am competent to testify to the contents of this declaration. I make this declaration in support of TTLG’s ex parte motion shortening time and limiting notice on TTLGS’s motion to withdraw as attorney for the Debtor in this case.

Ms. Diane Erdmann, who claims an interest in the funds currently being held in the TTLG IOLTA trust account, has filed a Grievance against me with the Washington State Bar Association because I have not returned the balance of the advanced fee deposit to her. The Chapter 11 Trustee has asserted a potential claim against the funds held in the trust

DECLARATION OF J. TODD TRACY IN SUPPORT
OF EX PARTE MOTION SHORTENING TIME AND
LIMITING NOTICE ON MOTION TO WITHDRAW
AS ATTORNEY FOR DEBTOR - 1

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account as well. As set forth in the Motion to Withdraw as Attorneys for Debtor, TTLG takes the position that RPC 1.15A(g) and WSBA Advisory Opinion 2213 require TTLG to safeguard the funds pending resolution of the competing claims. TTLG has asked the Court for entry of an order providing for said safeguarding. I would urge the Court to set a hearing, as soon as possible in order that the issue of safeguarding of funds is resolved.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and information.

DATED this 20th day of April, 2016.

/s/ J. Todd Tracy
J. Todd Tracy, WSBA #17342

DECLARATION OF J. TODD TRACY IN SUPPORT OF EX PARTE MOTION SHORTENING TIME AND LIMITING NOTICE ON MOTION TO WITHDRAW AS ATTORNEY FOR DEBTOR - 2

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