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Honorable Christopher M. Alston  
Chapter 11

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

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

Case No. 16-11767-CMA

TRUSTEE'S RESPONSE TO MOTION  
FOR AUTHORITY TO WITHDRAW  
AS ATTORNEY FOR DEBTOR

13 Mark Calvert, the Chapter 11 Trustee (the "Trustee"), files this response to the Motion of the  
14 Tracy Law Group PLLC ("TTLG") for Authority to Withdraw as Attorney for Debtor (the  
15 "Motion").

16 The Trustee has no objection to TTLG's withdrawal as counsel for the Debtor. The Motion  
17 also seeks direction as to the disposition of the remainder of the prepetition retainer TTLG received  
18 in connection with TTLG's representation of the Debtor. Based on the Trustee's investigation to  
19 date, the Trustee has reason to believe that the source of the retainer was property of the Debtor. The  
20 Trustee continues to investigate the circumstances surrounding the retainer and other financial  
21 transactions involving insiders of the Debtor and will separately seek authority to conduct BR 2004  
22 examinations relating to those issues.

23 Accordingly, the Trustee requests that the Court direct TTLG to turn over the retainer held by  
24 TTLG to the Trustee, who will hold the funds in a segregated account pending a resolution as to the  
25 estate's entitlement to such funds. If the Court prefers, the Trustee consents to directing TTLG to  
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TRUSTEE'S RESPONSE TO MOTION FOR  
AUTHORITY TO WITHDRAW AS ATTORNEY FOR  
DEBTOR - 1

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1 pay such funds into the Court's registry pending a resolution of the ownership of the funds. Whether  
2 held by the Trustee or in the registry of the Court, the funds should be subject to release only upon  
3 agreement of TTLG, the Trustee, and any other party expressing an interest in the funds, or upon  
4 further order of the Court.

5  
6 DATED this 20th day of April, 2016.

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8  
9 K&L GATES LLP

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11 By /s/ Michael J. Gearin  
12 Michael J. Gearin, WSBA #20982  
13 David C. Neu, WSBA #33143  
14 Brian T. Peterson, WSBA #42088  
15 Attorneys for Mark Calvert, Chapter 11 Trustee  
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TRUSTEE'S RESPONSE TO MOTION FOR  
AUTHORITY TO WITHDRAW AS ATTORNEY FOR  
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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 20, 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.

Also on April 20, 2016, she caused a copy of the document to which this is attached to be served via U.S. Mail, postage prepaid to:

Bradley Steven Cohan c/o Anthony Michael Glassman 360 N Bedford Dr Beverly Hills, CA 90210	Bud Jameson 12 POST OAK LOOP SHERWOOD, AR 72120-3700	Cohen Asset Management, Inc. c/o Anthony Michael Glassman 360 N Bedford Dr Beverly Hills, CA 90210
David James 16855 James Lane Bend, OR 97703	Don Wright 13820 NE 65th #546 Redmond, WA 98052	Dr. Bob Austin c/o Ross Jones 106 Del Ray Rd Mossyrock, WA 98564
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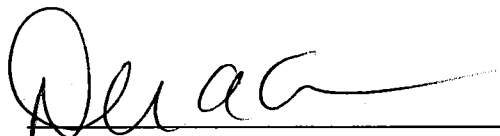
TRUSTEE'S RESPONSE TO MOTION FOR  
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DATED this 20th day of April, 2016, at Seattle, Washington.



Denise A. Evans

TRUSTEE'S RESPONSE TO MOTION FOR  
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DEBTOR - 4

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