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Honorable Christopher M. Alston  
Chapter 11  
*Ex Parte*

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6  
7 UNITED STATES BANKRUPTCY COURT  
8 WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 In re:  
10  
11 NORTHWEST TERRITORIAL MINT, LLC,

Case No. 16-11767-CMA

*EX PARTE* MOTION TO SHORTEN TIME  
AND LIMIT NOTICE ON TRUSTEE'S  
MOTIONS:

- 12 (1) MOTION FOR CASE  
13 MANAGEMENT ORDER  
14 (2) FINAL APPLICATION FOR ORDER  
AUTHORIZING EMPLOYMENT OF  
15 K&L GATES LLP AS ATTORNEYS  
FOR TRUSTEE  
16 (3) FINAL AND INTERIM  
APPLICATION FOR ORDER  
17 AUTHORIZING EMPLOYMENT OF  
18 CASCADE CAPITAL GROUP, LLC  
AS ACCOUNTANTS FOR TRUSTEE  
19 (4) MOTION FOR ORDER  
ESTABLISHING PROCEDURES FOR  
20 INTERIM PAYMENT OF FEES AND  
COSTS TO PROFESSIONALS  
21 EMPLOYED BY TRUSTEE AND  
22 CREDITORS COMMITTEE  
23 (5) MOTION FOR ORDER SETTING  
DEADLINE FOR FILING PROOFS OF  
24 CLAIM

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*EX PARTE* MOTION TO SHORTEN TIME AND LIMIT  
NOTICE - 1

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1 Mark Calvert, the Chapter 11 Trustee (the “Trustee”), moves the Court for an order  
2 shortening time for a hearing on the Trustee’s following motions (collectively, the “Motions”):

- 3 • Trustee’s Motion for Case Management Order;
- 4 • Final Application for Order Authorizing Employment of K&L Gates LLP as Attorneys for  
5 Trustee;
- 6 • Final and Interim Application for Order Authorizing Employment of Cascade Capital Group  
7 LLC as Accountants for Trustee;
- 8 • Motion for Order Establishing Procedures for Interim Payment of Fees and Costs to  
9 Professionals Employed by Trustee and Creditors Committee; and
- 10 • Motion for Order Setting Deadline for Filing Proofs of Claim.

11 Cause exists to shorten time on the Motions. The Trustee seeks an order shortening time so  
12 that the Motions can be heard expeditiously, and concurrently with a matter in this case already  
13 calendared for May 6, 2016. In particular, it is important that the Trustee, as quickly as possible,  
14 obtain Court approval to use the resources of Cascade Capital Group LLC as his accountants, and to  
15 set in place procedures for the efficient management of this case.

16 The Trustee also seeks to limit notice on the Motions. Because there are over 3400 creditors  
17 in this case, the cost of providing notice of the Motions to every creditor in the case would be  
18 extraordinary. Given the circumstances, and in an effort to minimize administrative expenses of the  
19 estate, the Trustee seeks to limit notice of the Motions to (1) all governmental entities as required by  
20 FRBP 7004(b)(4) and (6); (2) the top 20 unsecured creditors (3) the Unsecured Creditors Committee;  
21 (4) parties affirmatively indicating a desire to receive such notice by the filing of a request for  
22 Special Notice; (5) parties against whom relief is being sought in a particular proceeding; (6) all  
23 known potential secured creditors; and (7) Debtor and Debtor’s counsel (collectively, the “Notice  
24 Parties”). The Trustee intends to mail notice of the hearing on the Motions on April 22, 2016, and  
25  
26

1 believes that such notice will not prejudice the rights of any parties in interest to respond to the  
2 Motion.

3 Based on the foregoing, the Trustee respectively requests that this Court grant this *ex parte*  
4 Motion and shorten the time for hearing on the Motions to May 6th at 9:30 a.m., and limit the parties  
5 who must be given notice of the Motion to the seven groups of persons set forth above.

6 DATED this 22nd day of April, 2016.  
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8 K&L GATES LLP  
9

10 By /s/ Michael J. Gearin  
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14 Attorneys for Mark Calvert, Chapter 11 Trustee  
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