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

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

Case No. 16-11767-CMA

DECLARATION OF MICHAEL J.
GEARIN IN SUPPORT OF TRUSTEE'S
MOTION FOR CASE MANAGEMENT
ORDER

14 I, Michael J. Gearin, hereby declare as follows:

15 1. I am a partner in the law firm of K&L Gates LLP ("K&L Gates") and am duly
16 authorized to practice law in this Court. I submit this declaration in support of Mark Calvert, the
17 duly appointed Chapter 11 Trustee's (the "Trustee") motion for a case management order.

18 2. There are in excess of 3400 creditors and parties-in-interest in this case. Under
19 the circumstances, the cost of copying and mailing even a simple notice to all parties on the
20 mailing matrix will be significant. As a result, the mailing of each notice in this case to each
21 creditor will not be the best use of the limited estate resources.

22 3. The Trustee has informed me that he believes it appropriate to enter a Case
23 Management Order which would limit notice of these proceedings to (1) all governmental
24 entities as required by FRBP 7004(b)(4) and (6); (2) the top 20 unsecured creditors (3) the
25 Unsecured Creditors Committee, and its counsel once counsel is retained; (4) parties

DECLARATION OF MICHAEL J. GEARIN IN
SUPPORT TRUSTEE'S MOTION FOR CASE
MANAGEMENT ORDER - 1

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1 affirmatively indicating a desire to receive such notice by the filing of a request for Special
2 Notice; (5) parties against whom relief is being sought in a particular proceeding; (6) all known
3 potential secured creditors; and (7) Debtor and Debtor's counsel.

4 4. It is not the Trustee's intent that the Case Management Order would be
5 construed to limit the following notices required to be sent to all creditors:

- 6 a. Notice of the hearing on dismissal of the case or the conversion of
7 the case to another chapter;
8 b. Notice of the dismissal or conversion of the case to another chapter;
9 c. Notice of the time fixed for filing proofs of claim, other than the
10 time fixed for the filing of any claim arising from the rejection of an
11 executory contract or lease;
12 d. Notices of (i) the time fixed for filing objections and the hearing to
13 consider approval of a disclosure statement, (ii) the time fixed for
14 filing objections and the hearing to consider confirmation of a
15 Chapter 11 plan, and (iii) the time fixed to accept or reject a
16 proposed modification of a plan;
17 e. Notice of any motion seeking to authorize the Trustee to sell all or
18 substantially all of its assets outside of a Chapter 11 plan; and
19 f. Notice of entry of an order confirming a Chapter 11 plan.

20 5. If granted, notice of the entry of the Case Management Order would be
21 sent to all parties listed on the official mailing matrix, giving all parties an opportunity to
22 submit a Request for Special Notice so as to thereafter receive all notices in this case.

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

24 EXECUTED this 22nd day of April, 2016, at Seattle, Washington.

25 */s/ Michael J. Gearin*
Michael J. Gearin

DECLARATION OF MICHAEL J. GEARIN IN
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MANAGEMENT ORDER - 2

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