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Honorable Christopher M. Alston
Chapter 11
Ex Parte

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

10 In re:

Case No. 16-11767-CMA

11 NORTHWEST TERRITORIAL MINT, LLC,

DECLARATION OF CHRISTOPHER M.
WYANT IN SUPPORT OF *EX PARTE*
MOTION FOR EXAMINATION OF
RENTON COIN SHOP, INC., BRYAN D.
GERAGHTY d/b/a NORTHGATE RARE
COIN, THE GOLD CENTER INC., and
VICTORIA DIAMONDS, LLC d/b/a
CASH 4 GOLD PURSUANT TO
RULE 2004 AND SUBPOENAS
PURSUANT TO RULE 9016

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18 Christopher M. Wyant declares as follows:

19 1. I am attorney with K&L Gates, LLP, counsel for the Chapter 11 Trustee, Mark
20 Calvert.

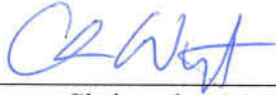
21 2. On March 30, 2017 I conducted the Rule 30(b)(6) deposition of Medallic Art
22 Company, LLC (“Medallic”) and deposition of Ross Hansen individually. Ross Hansen appeared as
23 the representative of Medallic. During the examination, I inquired into the identities of Medallic’s
24 creditors. Attached hereto as Exhibit A are the relevant pages from the transcript of the deposition,
25 which were provided to me by the court reporter.
26

DECLARATION OF CHRISTOPHER M. WYANT IN
SUPPORT OF *EX PARTE* MOTION FOR SUBPOENA
PURSUANT TO RULES 2004 AND 9016 - 1
500395557 v2

K&L Gates LLP
925 FOURTH AVENUE, SUITE 2900
SEATTLE, WASHINGTON 98104-1158
TELEPHONE: (206) 623-7580
FACSIMILE: (206) 623-7022

1 I declare under the penalty of perjury under the laws of the State of Washington that the
2 foregoing is true and correct to the best of my knowledge.

3 Executed this 12th day of May, 2017, at Seattle, Washington.

4
5 

6 _____
7 Christopher M. Wyant
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DECLARATION OF CHRISTOPHER M. WYANT IN
SUPPORT OF *EX PARTE* MOTION FOR SUBPOENA
PURSUANT TO RULES 2004 AND 9016 - 2

500395557 v2

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925 FOURTH AVENUE, SUITE 2900
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1 **CERTIFICATE OF SERVICE**

2 The undersigned declares as follows:

3 That she is a paralegal in the law firm of K&L Gates LLP, and on May 12, 2017, she caused
4 the foregoing document to be filed electronically through the CM/ECF system which caused
5 Registered Participants to be served by electronic means, as fully reflected on the Notice of
6 Electronic Filing.

7 Also on May 12, 2017, she caused to be deposited in the mail of the United States of
8 America, by first class postage prepaid, addressed envelopes containing copies of the foregoing
9 document and mailed to the following addresses:

10 Northwest Territorial Mint LLC c/o Ross Hansen, Member P.O. Box 2148 Auburn, WA 98071-2148	Renton Coin Shop, Inc. c/o Brian Wichmann, Reg. Agent 15201 Military Road South Seattle, WA 98188
11 Renton Coin Shop, Inc. c/o Steve Campau 101 Park Avenue North Renton, WA 98057	Victoria Diamonds LLC d/b/a Cash 4 Gold c/o Victor Ivanov 2012 Shattuck Avenue S Renton, WA 98055
12 Victoria Diamonds LLC d/b/a Cash 4 Gold 32700 Pacific Hwy South, Suite 2 Federal Way, WA 98003	Bryan D. Geraghty d/b/a Northgate Rare Coins & Precious Metals 11319 Pinehurst Way NE Seattle, WA 98125
13 The Gold Center 3000 W. Lles Avenue Springfield, IL 62704	

14 I declare under penalty of perjury under the laws of the State of Washington and the United
15 States that the foregoing is true and correct.

16 Executed on the 12th day of May, 2017 at Seattle, Washington.

17 
18 Denise A. Lentz

EXHIBIT A

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UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

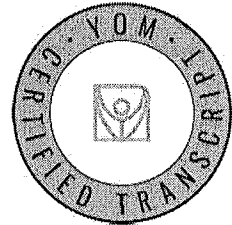
IN RE:)
)
NORTHWEST TERRITORIAL MINT, LLC,)
)
Debtor.)

16-11767-CMA

MEDALLIC ART COMPANY, LLC, a Nevada)
limited liability company,)
)
Plaintiff,)
v.)

A16-01196-CMA

MARK CALVERT, as trustee on behalf of)
the estate of Northwest Territorial)
Mint, LLC,)
)
Defendant.)



VIDEOTAPED 30(b)(6) DEPOSITION UPON
ORAL EXAMINATION OF
MEDALLIC ART COMPANY, LLC
BERNHARD ROSS HANSEN
AND IN HIS PERSONAL CAPACITY
(VOLUME 2)

9:44 A.M.

MARCH 30, 2017

925 FOURTH AVENUE, SUITE 2900

SEATTLE, WASHINGTON

REPORTED BY: SHARI L. WHEELER, CCR NO. 2396



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A P P E A R A N C E S

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1 that right?

2 A. Correct.

3 Q. And there may have been creditors, in the sense
4 that those vendors provided services, and then there
5 was some time until they were paid; is that right?

6 A. Yes.

7 Q. And were they paid in full, to your knowledge?

8 A. I believe so.

9 Q. And who paid them?

10 A. MAC would've paid them.

11 Q. So it would've been a check or a wire transfer
12 issued out of a MACLLC bank account to those vendors?

13 A. Yeah. I think it was out of the account that
14 we had with -- our account in Nevada.

15 Q. What bank was that with?

16 A. Oh, gosh. It's -- I'm trying to think. City
17 National.

18 Q. Does MACLLC owe you any money personally?

19 A. Yes.

20 Q. What?

21 A. Attorney's fees.

22 Q. In the sense that you fronted the cost for
23 attorney's fees personally, and you believe the company
24 owes you back that money?

25 A. Correct.



1 Q. How much is that?

2 A. Half a million dollars. And actually it was
3 money that I borrowed, so it's actually -- it was
4 fronted by Diane, so it was -- it's actually owed to
5 Diane.

6 Q. So would it be fair to say that Diane is a
7 creditor?

8 A. Yeah. You know, technically, it's Diane who's
9 the creditor. You know, the -- you know, these
10 extraordinarily expensive attorneys I have, you know,
11 they're --

12 Q. Once again, no comment.

13 A. He makes me pay him in francs.

14 Q. The creditors that we discussed, early in the
15 2009 to 2010 time period, of MACLLC, were those
16 creditors -- any of them or all of them -- aware that
17 MACLLC held assets that Northwest Territorial Mint was
18 leasing and using for operations?

19 A. I -- I -- I'm not aware of what they knew or
20 what they didn't know. You know, it was just some
21 services, some lawyers, you know, some appraisers, or
22 things like that. And, you know, it -- they weren't --
23 it was just some trade debt, so it wasn't like we
24 borrowed money from them. You know, it was -- they did
25 an appraisal. We paid for the appraisal.



1 Q. When Ms. Erdmann loaned money to the company,
2 did she deposit money in the MACLLC bank account, the
3 one down in -- I think you said Oregon -- or sorry --
4 Nevada?

5 A. No.

6 Q. How did she, I guess, transfer the money to
7 MACLLC or for its benefit?

8 A. Direct pay.

9 Q. So she directly paid the Bucknell firm?

10 A. Uh-huh. Yes.

11 Q. And when she directly paid the Bucknell firm,
12 did she do it by wire transfer, check, some way that it
13 would be documented?

14 A. Yes.

15 Q. And how did she pay?

16 A. I think she's done both.

17 Q. Both wires and checks?

18 A. Yes.

19 Q. And are those out of a particular account? Is
20 it an account in her personal name?

21 A. I don't know how she's done that.

22 Q. And are those payments that she's making, that
23 become credit back from MACLLC -- are they made
24 monthly, just when the monthly bills come in? Or are
25 they made -- were they made all at once?



1 A. No. It's been as the bills have come in.

2 Q. Were there ever payments in cash, like physical
3 cash?

4 A. I don't think so.

5 Q. So in order to figure out exactly how much she
6 is owed as a current creditor of MACLLC, basically, you
7 just have to go look at her check and wire transfer
8 history from her to the Bucknell firm, and that
9 would -- you add all that up, and you get a number?

10 A. Correct.

11 Q. Do you have any idea what that approximate
12 number is, in terms of the amount of credit?

13 A. I don't.

14 Q. Earlier, you mentioned a number of, I think,
15 close to a half million dollars, was that --

16 A. You know, I'm -- that was a number off the top
17 of my head, so I don't know if that's true or not,
18 so ...

19 Q. You don't know if that's the amount that she
20 paid on behalf of Medallic, LLC?

21 A. Yeah. I'm probably -- that's probably heavy.

22 Q. Does MAC -- and MACLLC currently has an unpaid
23 amount to the Bucknell firm that makes the Bucknell
24 firm a creditor?

25 A. Yes.

