

1 Michael J. Gearin, WSBA # 20982
David C. Neu, WSBA # 33143
2 Brian T. Peterson, WSBA # 42088
K&L GATES LLP
3 925 Fourth Avenue, Suite 2900
Seattle, WA 98104-1158
4 (206) 623-7580

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 NORTHWEST TERRITORIAL MINT, LLC,
11
12 Debtor.

Case No. 16-11767-CMA

EX PARTE MOTION TO SHORTEN TIME
ON TRUSTEE'S MOTION FOR
EXAMINATION OF ROSS B. HANSEN
AND DIANE ERDMANN PURSUANT
TO RULE 2004 AND SUBPOENAS
PURSUANT TO RULE 9016

14 Mark Calvert, the Chapter 11 Trustee (the "Trustee"), moves the Court for an order
15 shortening time for a hearing on the Motion for Examination of Ross B. Hansen and Diane Erdmann
16 Pursuant to Rule 2004 and Subpoenas Pursuant to Rule 9016 (the "Motion") (Dkt. 1052).

17 As detailed in the Motion, the Trustee has recently obtained information that shows that after
18 providing sworn testimony regarding her lack of assets, Diane Erdmann has liquidated several
19 hundred thousands of dollars worth of bullion and precious metal since October, 2016. The Trustee
20 seeks to examine Ms. Erdmann as to these transactions. The Trustee initially filed the Motion on an
21 *ex parte* basis out of concern that Ms. Erdmann continues to liquidate assets. It is time sensitive that
22 the Trustee obtain information necessary to assess and identify what she is liquidating so that to the
23 extent assets are being improperly disbursed, or that she is disbursing property of the estate, the
24 damage can be mitigated.

25
26 *EX PARTE* MOTION TO SHORTEN TIME ON MOTION
FOR EXAMINATION OF ROSS B. HANSEN AND
DIANE ERDMANN PURSUANT TO RULE 2004 AND
SUBPOENAS PURSUANT TO RULE 9016 - 1
500424625 v1

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

1 Based on the foregoing, the Trustee respectively requests that this Court grant this *ex parte*
2 Motion and shorten the time for hearing on the Motion and to set the hearing on the Court's regular
3 Chapter 11 calendar on June 23, 2017, at 9:30 a.m. The Trustee will send notice of the hearing
4 within one day of entry of the order shortening time.

5 DATED this 5th day of June, 2017.
6

7 K&L GATES LLP
8

9 By /s/ David C. Neu
10 Michael J. Gearin, WSBA #20982
11 David C. Neu, WSBA #33143
12 Brian T. Peterson, WSBA #42088
13 Attorneys for Mark Calvert, Chapter 11 Trustee
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EX PARTE MOTION TO SHORTEN TIME ON MOTION
FOR EXAMINATION OF ROSS B. HANSEN AND
DIANE ERDMANN PURSUANT TO RULE 2004 AND
SUBPOENAS PURSUANT TO RULE 9016 - 2
500424625 v1

K&L GATES LLP
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SEATTLE, WASHINGTON 98104-1158
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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 June 5, 2017, 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 June 5, 2017, she caused the foregoing document to be placed in the mail to the Parties at the addresses listed below:

Northwest Territorial Mint LLC
c/o Ross Hansen, Member
P.O. Box 2148
Auburn, WA 98071-2148

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

Executed on the 5th day of June, 2017 at Seattle, Washington.

/s/ Denise A. Lentz
Denise A. Lentz