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Honorable Christopher M. Alston
Chapter 11
Hearing Location: Rm. 7206
Hearing Date: June 9, 2017
Hearing Time: 9:30 a.m.
Response Date: June 2, 2017

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

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

Case No. 16-11767-CMA

TRUSTEE'S REPLY TO ROSS HANSEN'S
RESPONSE TO MOTION FOR AUTHORITY
TO (A) SELL GRACO INVENTORY; (B)
ABANDON TRUCK; (C) DISPOSE OF
EQUIPMENT AT SCRAP VALUE; AND (D)
ABANDON AND DESTROY RECORDS

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16 Mark Calvert (the "Trustee"), Chapter 11 Trustee for Northwest Territorial Mint, LLC
17 ("NWTM" or the "Debtor"), replies to Ross Hansen's response (the "Response") to his Motion,
18 requesting authority to (a) sell certain inventory associated with NWTM's Graco Awards business;
19 (b) abandon a 1962 Chevrolet C/50 truck; (c) to sell or abandon certain scrap equipment that is of no
20 longer any use to NWTM; and (d) abandon and destroy business records of NWTM from before
21 2009 (the "Motion") as follows:

22 **REPLY**

23 As was detailed in the Motion and supporting declaration, the estate has no use for the pre-
24 2009 records of NWTM (the "Records"), which go back as far as 1990 and which take up a
25 substantial amount of space in the Debtor's facility. In order to resolve issues with the landlord
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1 regarding fire hazard issues and cleanliness of the facility, and to free the estate from the burden of
2 maintaining the Records, the Trustee should be granted authority to destroy the Records.

3 It is unclear what value Ross Hansen believes the Records offer. It is also unclear what
4 standing Ross Hansen, whose equity interest in the Debtor has no value by his own admission, has to
5 object to the Motion. Nonetheless, the Trustee is willing to allow Ross Hansen a limited period of
6 time to take possession of, and remove from the Dayton facility at his own expense, the Records
7 which the Trustee intends to destroy. The Trustee is unwilling, however, to continue to store old and
8 irrelevant records at a cost to the estate. Accordingly, the Trustee will agree to allow Ross Hansen a
9 period of two weeks from the entry of an Order approving the Motion to remove the Records, and
10 respectfully requests that the Court enter an order in the form (reflecting edits in redline) attached
11 hereto as Exhibit A.

12 DATED this 6th day of June, 2017.

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14 K&L GATES LLP

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16 By /s/ David C. Neu
17 Michael J. Gearin, WSBA #20982
18 David C. Neu, WSBA #33143
19 Brian T. Peterson, WSBA #42088
20 Attorneys for Mark Calvert, Chapter 11 Trustee

CERTIFICATE OF SERVICE

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The undersigned declares as follows:

That she is a Paralegal in the law firm of K&L Gates LLP, and on June 6, 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 6, 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 6th day of June, 2017 at Seattle, Washington.

/s/ Denise A. Lentz
Denise A. Lentz