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5 925 Fourth Avenue, Suite 2900  
6 Seattle, WA 98104-1158  
7 (206) 623-7580

Honorable Christopher M. Alston  
Chapter 11

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

SUPPLEMENTAL DECLARATION OF  
DAVID C. NEU REGARDING  
DEBTOR IN POSSESSION  
FINANCING

14 I, David C. Neu, 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 supplemental declaration in support of the  
17 proposed Final Order Granting Trustee’s Motion for Authority to Enter into Post-Petition  
18 Financing Agreement Pursuant to 11 U.S.C. §364 (“Final Order”). I am competent in all ways to  
19 testify and I have personal knowledge of the facts set forth herein.

20 2. On June 9, 2017, I received the results of a UCC financing statement search for  
21 Northwest Territorial Mint, LLC, a copy of which is attached hereto as Exhibit A. The search  
22 shows that there are two UCC financing statements on file with the Washington Department of  
23 Licensing. The first is a financing statement filed by Pan American Silver Corp., a copy of which  
24 is attached hereto as Exhibit B. A copy of the proof of claim filed by Pan American Silver Corp.  
25 is attached hereto as Exhibit C. The second is a nonsensical financing statement filed by Jeffrey

SUPPLEMENTAL DECLARATION OF  
DAVID C. NEU - 1  
500435213 v1

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1 Mark McMeel, which does not describe an interest in any collateral. A copy is attached as  
2 Exhibit D.

3 3. Attached hereto as Exhibit E is a proposed order authorizing debtor in possession  
4 financing on a final basis, in redline showing the changes from the interim order. Because of the  
5 newly discovered financing statement filed by Mr. McMeel, Prestige has requested that the order  
6 provide that its interest is a first-priority lien. This provision does not comply with Guideline 3  
7 of Appendix A of the Local Bankruptcy Rules, however the UCC search confirms that there are  
8 no other creditors with a lien in the DIP Facility Collateral. Accordingly, such a finding is  
9 appropriate under the circumstances.

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

11 EXECUTED this 12th day of June, 2017, at Seattle, Washington.

12 /s/ David C. Neu  
13 David C. Neu

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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 12, 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 12, 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 12th day of June, 2017 at Seattle, Washington.

/s/ Denise A. Lentz  
Denise A. Lentz