

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  
Hearing Location: Seattle, Rm. 7206  
Hearing Date: September 1, 2017  
Hearing Time: 9:30 a.m.  
Response Date: August 25, 2017

5  
6  
7  
8 UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

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

Case No. 16-11767-CMA  
DECLARATION OF JODY CANNADY IN  
SUPPORT OF TRUSTEE'S SECOND  
MOTION FOR ORDER GRANTING  
AUTHORITY TO RETURN STORED  
INVENTORY TO CUSTOMERS

14  
15  
16 I, Jody Cannady, hereby declare as follows:

17 1. I submit this Declaration in support of the Trustee's Second Motion for Order  
18 Granting Authority to Return Stored Inventory to Customers (the "Motion"). I am over eighteen  
19 (18) years of age, and I am competent in all ways to testify.

20 2. I am an accountant for Cascade Capital Group, LLC. On April 14 through April 19,  
21 2016, I led the inventory process at Northwest Territorial Mint, LLC's ("NWTM" or the "Debtor")  
22 Federal Way, Washington facilities (the "Federal Way Office") and on April 20 through April 22,  
23 2016 I led the inventory process at NWTM's Auburn, Washington facilities (the "Auburn Office")  
24 (collectively, the Washington Offices). In connection with my inventory of precious metals at the  
25 Washington Offices, I secured and identified inventory marked as storage inventory for specific  
26 customers (the "Stored Inventory"). In particular, I confirmed the existence, identification and

DECLARATION OF JODY CANNADY IN SUPPORT OF  
SECOND MOTION FOR ORDER GRANTING  
AUTHORITY TO RETURN STORED INVENTORY - 1

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

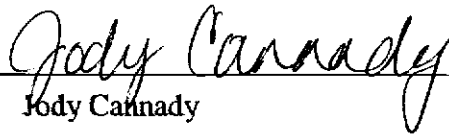
500481068 v1

1 location of certain Stored Inventory. During the inventory process, Derrin Tallman took  
2 photographs of inventory located at the Washington Offices. See Supplemental Declaration of  
3 Derrin Tallman in Support of Motion for Order Granting Authority to Return Stored Inventory,  
4 Other Customer Owned Inventory, and Coining Dies [Dkt. 622].

5 3. Through my personal inspection of the inventory, I discovered that two 100 oz. Pan  
6 American silver bars were stored in safe 2, shelf 2 in NWTM's Auburn, WA, facility, and that these  
7 bars were labeled with a post-it note with the name "Arnold Abrams." Attached hereto as Exhibit A  
8 is a copy of a photograph of the silver bars taken during the inventory process.

9 I declare under the penalty of perjury under the laws of the United States that the foregoing is  
10 true and correct to the best of my knowledge.

11 EXECUTED this 25<sup>th</sup> day of July, 2017, at Seattle, Washington.

12  
13   
14 Jody Cannady

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
DECLARATION OF JODY CANNADY IN SUPPORT OF  
SECOND MOTION FOR ORDER GRANTING  
AUTHORITY TO RETURN STORED INVENTORY - 2

500481068 v1

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

# EXHIBIT A

~~Art~~  
Arnold Abrams

Pan American  
Silver Corp.

100 TROY OUNCE BAR  
999+ FINE SILVER

0034132



Pan American  
Silver Corp.

100 TROY OUNCE BAR  
999+ FINE SILVER

018041

Weight: 13.8800      Unit Weight: 0      Count: 0

4200    Net   Stable Zero   1D   Kg    Sample   Preset   U. Weight   Memory   Charging

ADAM  
1 2 3 4 5 .

Do Not change