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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

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

DECLARATION OF ERIN SHEAR IN  
SUPPORT OF REPLY TO RESPONSE OF  
DIANE AND RANDY WONG TO THE  
TRUSTEE'S SECOND MOTION FOR ORDER  
GRANTING AUTHORITY TO RETURN  
STORED INVENTORY TO CUSTOMERS

16 I, Erin Shear, hereby declare as follows:

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

21 2. I am a Custom Sales Representative of Northwest Territorial Mint, LLC ("NWTM")  
22 or the "Debtor". As part of my duties, I have assisted the Trustee in efforts to identify precious  
23 metals that belong to specific customers. During the summer and fall of 2016, I worked with the  
24 Trustee to identify customer owned inventory and reconcile storage records in connection with the  
25 Trustee's initial Motion for Order Granting Authority to Return Stored Inventory, Other Customer

26 DECLARATION OF ERIN SHEAR IN SUPPORT OF  
REPLY TO RESPONSE TO SECOND MOTION FOR  
ORDER GRANTING AUTHORITY TO RETURN STORED  
INVENTORY - 1

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1 Owned Inventory and Coining Dies (the "Initial Stored Inventory Motion"). In connection with my  
2 work relating to the Initial Stored Inventory Motion, I reviewed NWTM business records relating to  
3 the stored inventory of Randy and Diane Wong (the "Wongs"). I confirmed that the company's  
4 business records reflected that the Wongs had delivered 70 - 100 oz. Pan American silver bars to the  
5 Mint and that the Mint has subsequently purchased 30 of these bars from the Wongs. On September  
6 21, 2016, the Court entered an order granting the Initial Stored Inventory Motion (the "Initial Return  
7 Order"). The Initial Return Order authorized the Trustee to return (1) 21 - 100 oz Pan American  
8 silver bars; (2) 9 - 100 oz Pan American silver bars for a total of 30 - 100 oz Pan American silver  
9 bars. I assisted the Trustee in returning the 30 - 100 oz Pan American silver bars to the Wongs in  
10 December 2016.

11 3. In connection with my work relating to the Initial Stored Inventory Motion, I  
12 reviewed NWTM business records relating to the stored inventory of Randy and Diane Wong (the  
13 "Wongs"). I also confirmed that the company's business records reflected that the Wongs had  
14 delivered 2 monster boxes of American Silver Eagles to the Mint and an additional 480 American  
15 Silver Eagles. On September 21, 2016, the Court entered an order granting the Initial Stored  
16 Inventory Motion (the "Initial Return Order"). The Initial Return Order authorized the Trustee to  
17 return 980 - 1 oz. Silver American Eagles to Diane and Randy Wong. I assisted the Trustee in  
18 returning the 980 - 1 oz. Silver American Eagles (one monster box containing 500 Silver American  
19 Eagles and an addition 480 Silver American Eagles) to the Wongs in December 2016.

20 4. Subsequent to the Initial Stored Inventory Motion and the Initial Return Order, I  
21 discovered an additional monster box containing 500 - 1 oz. Silver American Eagles in one of the  
22 safes at NWTM's Auburn, Washington, facility labeled with the name "Wong." This additional  
23 monster box is the only additional inventory I found identified as belonging to the Wongs and the  
24 Trustee's present motion seeks to return this monster box to the Wongs. Since the Wongs  
25 previously had a monster box of 500 - 1 oz. Silver American Eagles returned to them, with the return  
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DECLARATION OF ERIN SHEAR IN SUPPORT OF  
REPLY TO RESPONSE TO SECOND MOTION FOR  
ORDER GRANTING AUTHORITY TO RETURN STORED  
INVENTORY - 2

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1 of this monster box, the Wongs will have received all precious metal that was labelled with their  
 2 name on it that was in the Trustee's possession wherever located.

3 5. Below is a summary of the records of NWTM regarding the Wongs' storage, metals  
 4 purchased by NWTM, metals returned, metals proposed to be returned to the Wongs in connection  
 5 with this second return motion and the Wongs' stored metals that remain missing:

Metal Received in Storage	Metal Purchased by NWTM (1/19/2016)	Metal Returned (12/2016)	Metal Proposed to be Returned (9/2017)	Missing
70 - 100 oz. Pan American silver bars (11/2012)	30 - 100 oz. Pan American silver bars	30 - 100 oz. Pan American silver bars		10 - 100 oz. Pan American silver bars
215 - 10 oz. Pan American silver bars (11/2012 and 8/2013)				215 - 10 oz. Pan American silver bars
128 - 5 oz. Pan American silver bars (11/2012)				128 - 5 oz. Pan American silver bars
760 - 1 oz. Pan American silver bars (11/2012)				760 - 1 oz. Pan American silver bars
480 - 1 oz. Silver American Eagles (8/2013)		480 - 1 oz. Silver American Eagles		None
2 Monster Boxes of Silver American Eagles (500 each) (11/2012)		1 Monster Box of Silver American Eagles	1 Monster Box of Silver American Eagles	None
14 - 1 oz. Gold American Eagle Coins (11/2012)				14 - 1 oz. Gold American Eagle Coins

26 DECLARATION OF ERIN SHEAR IN SUPPORT OF  
 REPLY TO RESPONSE TO SECOND MOTION FOR  
 ORDER GRANTING AUTHORITY TO RETURN STORED  
 INVENTORY - 3

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1           6.       None of the precious metal presently in the possession of the Mint have serial  
2 numbers which match those that the Wongs identify as the serial numbers on the 100 oz Pan  
3 American silver bars they delivered to the Mint.

4           7.       Contrary to the Wong suggestion, five ounce and ten ounce Pan American bars are  
5 not unique. The Mint commonly held five and ten ounce Pan American bars for sale to customers,  
6 as leased inventory and as stored inventory. Unless a five ounce or ten ounce Pan American bar was  
7 labelled with a specific customers name on it, it would be impossible to determine that it had been  
8 stored for that specific customer.

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 29th day of August, 2017, at Kent, Washington.

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Erin Shear

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DECLARATION OF ERIN SHEAR IN SUPPORT OF  
REPLY TO RESPONSE TO SECOND MOTION FOR  
ORDER GRANTING AUTHORITY TO RETURN STORED  
INVENTORY - 4

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**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 August 29, 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 August 29, 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 29th day of August, 2017 at Seattle, Washington.

/s/ Denise A. Lentz  
Denise A. Lentz

DECLARATION OF ERIN SHEAR IN SUPPORT OF  
REPLY TO RESPONSE TO SECOND MOTION FOR  
ORDER GRANTING AUTHORITY TO RETURN STORED  
INVENTORY - 5

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