1	Honorable Christopher M. Alston
2	Chapter 11 Hearing Date: October 20, 2017
3	Hearing Time: 9:30 a.m. Response Date : October 13, 2017
4	
5	
6	
7	UNITED STATES BANKRUPTCY COURT
, 8	WESTERN DISTRICT OF WASHINGTON
	In Re:) Case No. 16-11767
9) Northwest Territorial Mint, LLC,
10) MOTION BY UNITED STATES Debtor.) TRUSTEE FOR ORDER (1)
11) RESTRICTING JEFFREY MARK) MCMEEL FROM FILING CERTAIN
12) PLEADINGS AND DOCUMENTS;
13) AND (2) SEALING CERTAIN) PLEADINGS AND DOCUMENTS
14) PREVIOUSLY FILED
15)
16	The United States Trustee hereby moves the Court for an order instructing the Clerk of
17	the Court not to accept any pleadings or documents for filing from Jeffrey Mark McMeel
18	("McMeel") that are not in compliance with the Court's Order Following Hearing on Order to
19	Show Cause Why Sanctions Should Not be Imposed and Amended Order to Show Cause Re
20	Civil Contempt (the "Sanctions Order") filed as ECF document no. 328 herein. Additionally, the
21	United States Trustee requests that all filings McMeel has made in violation of the Sanctions
	Order be sealed.
22	In support of this motion (the "Motion"), the United States Trustee respectfully states as
23	follows:
24	1. This Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and
25	1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and venue is proper pursuant
26	to 28 U.S.C. §§ 1408 and 1409.
	MOTION - 1 MOTION - 1 Office of the United States Trustee 700 Stewart Street, Suite 5103 Seattle, WA 98101-1271 206-553-2000, 206-553-2566 (fax)

Case 16-11767-CMA Doc 1209 Filed 09/22/17 Ent. 09/22/17 15:57:57 Pg. 1 of 3

2. The Motion is made pursuant to 11 U.S.C. § 105(a), and Rules 9014 and 9020 of the Federal Rules of Bankruptcy Procedure, and is based upon the Motion, and the records and files in the case.

4 3. On May 20, the Court held a hearing on an Order to Show Cause relating to the 5 filing of certain pleadings and documents by McMeel. That hearing resulted in the Sanctions 6 Order that was entered on May 27, 2016. The Sanctions Order found that McMeel had filed numerous false and frivolous papers in bad faith, vexatiously, and for oppressive reasons, 7 thereby participating in an abuse of process that interfered with the rights of individuals and 8 government agencies, and further interfered with the administration of justice. Sanctions Order, 9 p.5, ¶ 6. 10

11

1

2

3

The Sanctions Order also:

12

Required McMeel to pay \$5,000 in sanctions (the "Sanctions"); a.

b. Prohibited McMeel, his agents, and anyone acting in concert with him 13 from filing or causing to be filed any documents or papers in this case until he pays the

14 Sanctions, except for the following:

d.

4.

15 A motion for reconsideration of the Sanctions Order; 16 A notice of appeal of the Sanctions Order; 17 Any documents relating to appeal of the Sanctions Order; A proof of claim, and any amendments thereto; 18 Any papers relating to any objection to his claim; and 19 Any papers in defense of claims or matters asserted against him. 20 c. Limited McMeel, after the Sanctions are paid, to filing papers and 21

pleadings that comply with Bankruptcy Rule 9011(b), and permanently barred McMeel from 22 filing any paper or pleading in this case on behalf of any other person or entity other than 23 himself; and

24 25

Struck and sealed certain filings by McMeel.

26

MOTION - 2

Office of the United States Trustee 700 Stewart Street, Suite 5103 Seattle, WA 98101-1271 206-553-2000, 206-553-2566 (fax)

¢ase 16-11767-CMA Doc 1209 Filed 09/22/17 Ent. 09/22/17 15:57:57 Pq. 2 of 3

- 5. Upon information and belief, the Sanctions have not been paid¹, and McMeel has violated the Sanctions Order by filing numerous pleadings, papers and documents outside the scope of what the Sanctions Order allows.
- 6. The United States Trustee believes that the following filings by McMeel violate
 the Sanctions Order and have not yet been sealed: ECF documents nos. 447, 456, 447, 477, 478,
 500, 616-618, 669, 677, 678, 735, 736, 789, 794, 817, 848, 850, 867, 878, 879, 884, 889, 898,
 901-907, 916, 917, 961, 983, 986, 1045, 1048, 1085, 1090-1094, 1112-1114, 1123, 1124, 1140,
 1141, 1165-1167, 1177, 1189-1194, and 1206.
 - WHEREFORE, In light of McMeel's clear and continuing violations of the restrictions set forth in the Sanctions Order, the United States Trustee requests that the Court enter an order:
 - A. Instructing the Clerk of the Court not to accept any further pleadings, papers or documents in violation of the Sanctions Order, or to only accept pleadings, papers and documents for or on behalf of McMeel if filed by an attorney;
- B. Striking and sealing all pleadings, papers, and documents found by the Court to
 violate the Sanctions Order such that only members of the Court's judicial chambers, the Clerk
 of the Court, Mr. McMeel, counsel for the United States Trustee, and the Court's IT staff shall
 have access to the seal documents; and
- 17

18

19

20

21

22

23

24

25

 26^{-}

MOTION - 3

1

2

3

9

10

11

12

C. Providing such other relief as the Court determines appropriate to protect the integrity of the bankruptcy system against further violations by McMeel of the Sanctions Order.

DATED this 22nd day of September, 2017.

Respectfully submitted,

Gail Brehm Geiger Acting U.S. Trustee for Region 18

By: /s/ Martin L. Smith Martin L. Smith, wsBA #24861 Attorney for United States Trustee

¹ Other than possibly \$1.00 as referenced in ECF document no. 793.

Office of the United States Trustee 700 Stewart Street, Suite 5103 Seattle, WA 98101-1271 206-553-2000, 206-553-2566 (fax)

Case 16-11767-CMA Doc 1209 Filed 09/22/17 Ent. 09/22/17 15:57:57 Pg. 3 of 3