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The Honorable Christopher M. Alston  
Chapter 11  
No hearing necessary

14 UNITED STATES BANKRUPTCY COURT  
15 WESTERN DISTRICT OF WASHINGTON AT SEATTLE  
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17  
18 In re:  
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20 NORTHWEST TERRITORIAL MINT,  
21 LLC,  
22  
23 Debtor.  
24  
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26

Case No. 16-11767-CMA  
(Jointly Administered)

MOTION FOR ORDER SHORTENING  
TIME FOR HEARING ON MOTION FOR  
RELIEF FROM STAY

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28 Pursuant to sections 105 and 364(c) of the Bankruptcy Code and Rule 4001 of the  
29 Federal Rules of Bankruptcy Procedure, Robert and Connie Hoff (the "**Hoffs**"), landlords of  
30 the 118,000 square foot industrial and office space in Dayton, Nevada (the "**Dayton**  
31 **Premises**" or "**Premises**"), are concurrently herewith filing a motion for an order granting  
32 relief from the automatic stay (the "**Stay Motion**"). This Motion for Order Shortening Time  
33 ("**Shortening Motion**") requests that the hearing on the Stay Motion be held as soon as  
34 possible, consistent with the Court's calendar.  
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43 **Basis for Relief**

44 Pursuant to Rule 9013(d)(2)(F) of the Local Bankruptcy Rules (the "**Local Rules**"),  
45 twenty-one (21) days' notice of a hearing on a motion is typically required. Bankruptcy  
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HOFF MOTION FOR ORDER SHORTENING TIME RE  
MOTION FOR RELIEF FROM STAY – 1

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1 Rule 9006(c) provides, however, that the Court may use its discretion to shorten such notice  
2 periods for cause, with or without notice. Local Rule 9013(d)(3) further provides that the  
3 notice period may be reduced in the case of exigent or exceptional circumstances.  
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7 As is more fully described in the Stay Motion and associated Hoff Declaration, the  
8 Trustee is in both monetary and non-monetary default under the Lease Agreement covering  
9 the Dayton Premises, and the Trustee has acknowledged he does not have the money to pay  
10 the rent, much less pay the property taxes for which he is already in default. Absent a quick  
11 hearing on the Stay Motion, on less than normal notice, the Trustee will be occupying the  
12 Premises during the postpetition basis without paying rent and without satisfying other  
13 monetary obligations under the Lease – a result flying in the face of the statutory policy  
14 behind Section 365(d)(3).  
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18 The Court is very familiar with the Dayton Premises, and is aware of the numerous  
19 non-monetary defaults in the condition of the Premises, all of which were ordered by the  
20 Court to be cured in a reasonable time frame, but virtually none of which have been touched  
21 much less completed. Again, absent a quick hearing on the Stay Motion, the Premises will  
22 continue to deteriorate with little or no maintenance or upkeep; the Hoff's will have no  
23 ability to fix any of the problems themselves; and when they finally get possession of their  
24 Premises back the costs to repair the Premises (all of which costs will be added to the  
25 administrative burden of this estate) will be significantly increased.  
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29 The Shortening Motion should be granted and the Stay Motion set for hearing at the  
30 Court's earliest convenience.  
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DATED: December 29, 2017

**PERKINS COIE LLP**

By: /s/ Alan D. Smith

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HOFF MOTION FOR ORDER SHORTENING TIME RE  
MOTION FOR RELIEF FROM STAY – 3

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