1 2 3	Michael J. Gearin, WSBA # 20982 David C. Neu, WSBA # 33143 Brian T. Peterson, WSBA # 42088 K&L GATES LLP 925 Fourth Avenue, Suite 2900 Seattle, WA 98104-1158	Honorable Christopher M. Alston Chapter 11 Hearing Location: Rm. 7206 Hearing Date: Friday, February 9, 2018 Hearing Time: 9:30 a.m. Response Date: February 5, 2018
4	(206) 623-7580	1
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8	WESTERN DISTRIC	ANKRUPTCY COURT T OF WASHINGTON
9	AISE	CATTLE
10	In re:	Case No. 16-11767-CMA
11	NORTHWEST TERRITORIAL MINT, LLC,	TRUSTEE'S STATEMENT REGARDING
12	Debtor.	ORDER ON HOFF'S MOTION FOR RELIEF FROM STAY
13		
14	Mark Calvert (the "Trustee"), Chapter 11	Trustee for Northwest Territorial Mint, LLC
15	("NWTM" or the "Debtor") submits his statement	t regarding the status of the parties discussions over
16	the form of order on the Motion for Relief from S	tay and for Related Relief filed by the Hoff's at
17	Dkt. 1328.	
18		
19	As the Hoffs reported in their Statement R	e Order Re Motion for Relief from Stay filed on
20	February 2, 2018 under Dkt. 1401, the parties are	in agreement on the form of proposed order. The
21	Trustee prepared a cash collateral budget and tran-	smitted that to counsel for the Hoffs on January 31,
22	2018 in accordance with the Court instruction. Sin	nce, the parties have engaged in discussion over
23	certain line items in the budget. The Trustee has a	revised the budget based in part on comments from
24	the Hoffs and due to recent developments affectin	g cash flow. The revised proposed budget is
25	attached hereto as Exhibit A.	
26		
	TRUSTEE'S STATEMENT RE ORDER RE MOTION FO RELIEF FROM STAY - 1 501023190 v1	K&L GATES LLP 925 FOURTH AVENUE SUITE 2900 SEATTLE, WASHINGTON 98104-1158 TELEPHONE: (206) 623-7580 FACSIMILE: (206) 623-7022

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1	The Trustee will continue to engage in dialogue with the Hoffs to narrow any disagreement
2	over budget issues and to the extent any issues remain unresolved as of the continued hearing date,
3	the Trustee will be prepared to present those issues to the Court for resolution.
4	
5	
6	DATED this 7th day of February, 2018.
7	K&L GATES LLP
8	
9	By <u>/s/ Michael J. Gearin</u> Michael J. Gearin, wSBA #20982
10	David C. Neu, wSBA #20982 Brian T. Peterson, wSBA #42088
11	Attorneys for Mark Calvert, Chapter 11 Trustee
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	K&L GATES LLP 925 FOURTH AVENUE SUITE 2900TRUSTEE'S STATEMENT RE ORDER RE MOTION FOR RELIEF FROM STAY - 2K&L GATES LLP 925 FOURTH AVENUE SUITE 2900501023190 v1SEATTLE, WASHINGTON 98104-1158 TELEPHONE: (206) 623-7580 FACSIMILE: (206) 623-7022
C	ase 16-11767-CMA Doc 1429 Filed 02/07/18 Ent. 02/07/18 22:49:23 Pg. 2 of 5

1	CERTIFICATE OF SERVICE
1	The undersigned declares as follows:
2 3	That she is a paralegal in the law firm of K&L Gates LLP, and on February 7, 2018, she
3 4	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.
5	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.
6	
7	Executed on the 7th day of February, 2018 at Seattle, Washington.
8	<u>/s/ Denise A. Lentz</u> Denise A. Lentz
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	K&L GATES LLP925 FOURTH AVENUESUITE 2900TRUSTEE'S STATEMENT RE ORDER RE MOTION FORRELIEF FROM STAY - 3501023190 v1K&L GATES LLPSEATTLE, WASHINGTON 98104-1158FACSIMILE: (206) 623-7580FACSIMILE: (206) 623-7022
C	ase 16-11767-CMA Doc 1429 Filed 02/07/18 Ent. 02/07/18 22:49:23 Pg. 3 of 5

EXHIBIT A

Case 16-11767-CMA Doc 1429 Filed 02/07/18 Ent. 02/07/18 22:49:23 Pg. 4 of 5

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