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Honorable Christopher M. Alston
Chapter 11
Hearing Location: Seattle, Rm. 7206
Hearing Date: Friday, May 4, 2018
Hearing Time: 9:30 a.m.
Response Date: April 27, 2018

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8 UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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

Case No. 16-11767-CMA

NOTICE OF HEARING ON
TRUSTEE'S MOTION FOR ORDER
CONVERTING CASE FROM A
CHAPTER 11 TO A CHAPTER 7 CASE

13 TO: NORTHWEST TERRITORIAL MINT, LLC, Debtor;
14 AND TO: UNITED STATES TRUSTEE;
15 AND TO: SPECIAL NOTICE LIST;
AND TO: ALL CREDITORS AND PARTIES-IN-INTEREST LISTED ON OFFICIAL MAILING
MATRIX

16 PLEASE TAKE NOTICE that a hearing has been scheduled on **May 4, 2018, at 9:30 a.m. (PT)**
17 before the Honorable Christopher M. Alston, United States Bankruptcy Judge, in Courtroom 7206, 700
18 Stewart Street, Seattle, WA, 98101 on the Trustee's Motion for Order Converting Case from a Chapter 11
to a Chapter 7 Case (the "Motion").

19 Upon his appointment, the Trustee took control over the business operations of the Debtor and
20 initiated his investigation of the financial affairs of the bankruptcy estate. The Trustee has worked for more
21 than 20 months to maintain and grow the business of the Northwest Territorial Mint. Unfortunately, the
22 business has not been profitable since the Spring of 2017 and the Trustee has run out of cash to continue to
operate the business. The Trustee closed the business on December 29, 2017 after working for many
months to sell the business as a going concern. The Debtor's business has terminated and there is no
possibility of reorganization. Thus, it is in the best interests of the creditors to convert this case.

23 By the Motion, the Trustee requests that the Court convert this case to a case under chapter 7 of the
24 Bankruptcy Code, and establish a deadline of 90 days from entry of the conversion order for creditors to file
pre-conversion administrative expense claims.

25 PLEASE TAKE FURTHER NOTICE that copies of the Motion and related documents may be
26 (1) reviewed and copied at the Clerk of the United States Bankruptcy Court, 700 Stewart Street, Seattle, WA

NOTICE OF HEARING ON MOTION FOR ORDER
CONVERTING CASE FROM A CHAPTER 11 TO A
CHAPTER 7 CASE - 1
500999684 v3

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1 98101 or (2) may be obtained by submitting a written request to Ms. Denise Lentz, Paralegal, K&L Gates,
2 LLP, 925 Fourth Avenue, Suite 2900, Seattle, WA 98104-1158, Email: denise.lentz@klgates.com.

3 PLEASE TAKE FURTHER NOTICE THAT IF YOU OPPOSE the Motion, you must file your
4 objection NO LATER THAN **Friday, April 27, 2018**. Objections must be filed with the Court, 700 Stewart
5 Street, Seattle, WA, 98101, and a copy delivered to:

6 Michael J. Gearin
7 David C. Neu
8 K&L Gates, LLP
9 925 Fourth Avenue, Suite 2900
10 Seattle, Washington 90104

11 PLEASE TAKE FURTHER NOTICE that in accordance with Local Bankruptcy Rule 9013-1(d)(7),
12 failure to timely file and serve an objection to the Motion may be deemed by the Court an admission that any
13 opposition to the Motion is without merit. Further, pursuant to Local Bankruptcy Rule 9013-1(e), failure to
14 appear at the hearing on the Motion may be deemed by the Court to be an admission that any opposition to
15 the Motion is without merit. Further, pursuant to Local Bankruptcy Rule 9013-1(f), if no opposition to the
16 Motion is timely filed and served, the Court may either (a) grant the Motion by default at the hearing, or (2)
17 grant the Motion prior to the hearing on the Trustee's ex parte presentation of a proposed order accompanied
18 by proof of service and a declaration that no objection to the Motion was timely received.

19 DATED this 23rd day of March, 2018.

20 K&L GATES LLP

21 By /s/ David C. Neu
22 Michael J. Gearin, WSBA #20982
23 David C. Neu, WSBA #33143
24 Brian T. Peterson, WSBA #42088
25 Attorneys for Mark Calvert, Chapter 11 Trustee
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NOTICE OF HEARING ON MOTION FOR ORDER
CONVERTING CASE FROM A CHAPTER 11 TO A
CHAPTER 7 CASE - 2
500999684 v3

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