

1 Michael J. Gearin, WSBA # 20982  
David C. Neu, WSBA # 33143  
2 Brian T. Peterson, WSBA # 42088  
K&L GATES LLP  
3 925 Fourth Avenue, Suite 2900  
Seattle, WA 98104-1158  
4 (206) 623-7580

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

5  
6  
7  
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 RENEWED MOTION  
FOR ORDER APPROVING SALE OF  
THE DEBTOR'S ASSETS FREE AND  
CLEAR OF LIENS, CLAIMS,  
INTERESTS, AND ENCUMBRANCES

14 TO: NORTHWEST TERRITORIAL MINT, LLC, Debtor;  
15 AND TO: UNITED STATES TRUSTEE;  
AND TO: SPECIAL NOTICE LIST;

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 Renewed Motion for Order Approving the Sale of  
Certain of the Debtor's Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances to  
19 Medalcraft Mint, Inc. (the "Motion").

20 The Trustee entered into an Asset Purchase Agreement dated January 26, 2018 with Medalcraft (the  
"Initial Medalcraft APA"), and on February 16, 2018, the Trustee filed his Motion for Order Approving Sale  
21 of the Debtor's Assets Free and Clear of all Liens, Claims, Interests and Encumbrances to Medalcraft Mint,  
Inc. (the "Initial Medalcraft Sale Motion"). Following the filing of the Initial Medalcraft Sale Motion, the  
22 Trustee received an additional offer for the assets covered by the Initial Medalcraft APA from an individual  
named Rodger May. At a hearing on March 19, 2018, the Court denied approval of the Initial Medalcraft  
23 Sale Motion.

24 The Trustee, subject to court approval, has entered into a new Asset Purchase Agreement with  
Medalcraft for the sale of the Medallic tradename, website, customer lists, archives, tools, specific machinery,

25  
26 NOTICE OF HEARING ON TRUSTEE'S RENEWED  
MOTION FOR ORDER APPROVING SALE OF  
DEBTOR'S ASSETS FREE AND CLEAR OF LIENS,  
CLAIMS, INTERESTS, AND ENCUMBRANCES - 1  
501169727 v2

K&L GATES LLP  
925 FOURTH AVENUE  
SUITE 2900  
SEATTLE, WASHINGTON 98104-1158  
TELEPHONE: (206) 623-7580  
FACSIMILE: (206) 623-7022

1 certain company owned Medallic dies and other property (the "Medalcraft APA")<sup>1</sup>. The Medalcraft APA  
2 contemplates a sale of Medallic Art Company, LLC's tradename, website, customer lists, archives, tools,  
3 specific machinery, and coining dies owned by Medallic Art Company, LLC to the extent such dies were  
4 created in the last twenty years. Medalcraft will pay \$1,000,000 for the assets which it proposes to purchase.

5 The Trustee has determined that the sale of these assets is in the best interest of the estate. By the  
6 Motion, the Trustee requests approval of the sale to Medalcraft Mint, Inc.

7 PLEASE TAKE FURTHER NOTICE that copies of the Motions and related documents may be  
8 (1) reviewed and copied at the Clerk of the United States Bankruptcy Court, 700 Stewart Street, Seattle, WA  
9 98101 or (2) may be obtained by submitting a written request to Ms. Denise Lentz, Paralegal, K&L Gates,  
10 LLP, 925 Fourth Avenue, Suite 2900, Seattle, WA 98104-1158, Email: denise.lentz@klgates.com.

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

14 Michael J. Gearin  
15 David Neu  
16 K&L Gates, LLP  
17 925 Fourth Avenue, Suite 2900  
18 Seattle, Washington 90104

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

DATED this 30th day of March, 2018.

K&L GATES LLP

By /s/ David C. Neu

Michael J. Gearin, WSBA #20982

David C. Neu, WSBA #33143

Brian T. Peterson, WSBA #42088

Attorneys for Mark Calvert, Chapter 11 Trustee

<sup>1</sup> The assets which are the subject of the Medalcraft sale are more particularly described in the Medalcraft APA which has been filed with the court as Exhibit A to the Declaration of Mark Calvert in Support of Trustee's Renewed Motion for Order Approving Sale of Certain of the Debtor's Assets Free and Clear of all Liens, Claims, Interests, and Encumbrances to Medalcraft Mint, Inc.