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Honorable Christopher M. Alston
Chapter 11

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6
7 UNITED STATES BANKRUPTCY COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 In re:

11 NORTHWEST TERRITORIAL MINT,
12 LLC,

13 Debtor.

Case No. 16-11767-CMA

14 DECLARATION OF MARK CALVERT IN
SUPPORT OF MOTION FOR ORDER
15 AUTHORIZING THE SALE OF REMAINING
PROPERTY OF THE ESTATE FREE AND
16 CLEAR OF ALL LIENS, CLAIMS, INTERESTS,
AND ENCUMBRANCES

17 I, Mark Calvert, declare as follows:

18 1. I am the Chapter 11 Trustee of Northwest Territorial Mint, LLC (“NWTM” or
19 “Debtor”) pursuant to the Court’s order of appointment dated April 11, 2016. I am over eighteen
20 (18) years of age and I am competent in all ways to testify. Unless otherwise stated, I make the
21 following statements based on my personal knowledge. I submit this Declaration in support of the
22 Motion for Order Authorizing the Sale of Remaining Property of the Estate Free and Clear of All
23 Liens, Claims, Interests, and Encumbrances (the “Motion”).

24 2. I hereby incorporate the information and statements contained in (i) the Declaration
25 of Mark Calvert in Support of Motion for Order Granting Authority to Incur Credit; Approving Bid
26 Procedures; and Approving Breakup Fee (Dkt. No. 1433); and (ii) Declaration of Mark Calvert in
Support of Motion for Order Authorizing the Auction and Sale of the Debtor’s Equipment, Dies,

DECLARATION OF MARK CALVERT IN SUPPORT OF
MOTION FOR ORDER AUTHORIZING THE SALE OF
REMAINING PROPERTY FREE AND CLEAR OF LIENS,
CLAIMS, INTERESTS, AND ENCUMBRANCES- 1
501597954 v3

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1 Tooling, Archives, and Inventory Free and Clear of All Liens, Claims, Interests and Encumbrances
2 (Dkt. No. 1351). As explained in those declarations, I have been forced to shut down the company's
3 operations and liquidate the Debtor's assets.

4 3. Since the beginning of this year, I have engaged in negotiations with multiple buyers
5 for various assets of the estate. I have separately reached agreements with Industrial Assets Corp.
6 ("Industrial Assets"), Medalcraft Mint, Inc. ("Medalcraft"), and American Numismatic Society, for
7 the purchase and sale of certain assets of the Debtor. The Industrial Assets and Medalcraft
8 agreements were approved by the Court and have closed. The sale to Industrial Assets Corp.
9 included substantially all of the Debtor's physical machinery and equipment. Medalcraft purchased
10 the Medallic Art name and website; marketing materials; Medallic archives; customer list; sales
11 history; vendor list; certain company owned dies associated with any customer for which there has
12 been a sale in the last 20 years; tools; and woodworking equipment and other assets. The sale to
13 American Numismatic includes older Medallic dies, medals, plaques, and other objects and archives
14 that were created prior to January 1, 1998. The sale to American Numismatic Society was recently
15 approved by this Court.

16 4. While I have already liquidating substantially all of the Debtor's assets, there are
17 remaining assets that I need to liquidate for the benefit of the estate (the "Remaining Property"). The
18 majority of the Remaining Property are miscellaneous items of property located in Dayton, Nevada
19 and Green Bay, Wisconsin. The Remaining Property includes, but is not limited to the following:
20 two vehicles, a gun safe, refrigerators, metal detector, microwaves, a television, retail merchandise
21 furniture, office furniture, equipment, appliances, and raw materials. I have compiled pictures and
22 written descriptions of much or all of the Remaining Property, which are located on the attached
23 Exhibit A. However, I also seek the authority to sell any and all additional items of Remaining
24 Property that may not be on the list attached hereto, wherever such property is located. I do not, by
25 the Motion, seek to sell any custom coining dies.

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DECLARATION OF MARK CALVERT IN SUPPORT OF
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REMAINING PROPERTY FREE AND CLEAR OF LIENS,
CLAIMS, INTERESTS, AND ENCUMBRANCES- 2
501597954 v3

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1 5. By the Motion, I request authority to sell the Remaining Property by private sale or
2 public auction, whichever I determine is in the best interest of the estate. Industrial Assets Corp.,
3 which previously purchased substantially all of the Debtor’s equipment and machinery, has
4 expressed a willingness to assist my sale efforts with respect to the Remaining Property. I
5 therefore also request that I be authorized to pay Industrial Assets a 10% commission on sales of
6 any of the Remaining Property for which Industrial Assets brings forward a buyer—whether at an
7 auction conducted by Industrial Assets, or through private sales.

8 6. According to the Court’s *Order Granting in Part and Denying in Part Motion for*
9 *Relief from the Automatic Stay and Related Relief* (“Relief From Stay Order”) (Dkt. No. 1450), the
10 automatic stay is modified to allow Bob and Connie Hoff (the “Hoffs”) to commence proceedings
11 under Nevada law to take possession of the Dayton premises on or after June 30, 2018, if I have not
12 vacated the premises by that date. I have reached an agreement in principal with the Hoffs to extend
13 that date to July 31, 2018 and the Court has approved that extension. Nevertheless, I need to vacate
14 the Dayton premises in short order.

15 7. Other than Robert and Connie Hoff, I am unaware of any other party who asserts an
16 interest in the Remaining Property. For the reasons described in the Motion, the Hoffs’ alleged
17 prepetition security interest is the subject of a bona dispute because I believe that any prepetition lien
18 held by the Hoffs is subject to avoidance under 11 U.S.C. § 544.

19 8. This Motion is in the best interests of the estate and should be approved by the Court.
20 The Remaining Property is of little value when compared with the majority of the estate’s physical
21 assets, which I have already liquidated. It is necessary that I obtain authority to sell by whatever
22 means necessary. It would be expensive and time consuming for me to bring multiple motions for
23 approval of the sale of individual items of remaining property given that such items are of de
24 minimus value. Furthermore, since many of the Remaining Assets are located in Dayton, Nevada, I
25 must sell the Remaining Property quickly before I am forced to leave the Dayton premises at the end
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DECLARATION OF MARK CALVERT IN SUPPORT OF
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REMAINING PROPERTY FREE AND CLEAR OF LIENS,
CLAIMS, INTERESTS, AND ENCUMBRANCES- 3
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1 of July. For all of these reasons, I respectfully request that the Court grant the Motion and authorize
2 me to liquidate the Remaining Assets of the estate without the need for further Court approval.

3 I declare under the penalty of perjury under the laws of the United States that the foregoing is
4 true and correct to the best of my knowledge.

5 EXECUTED this 15th day of June, at Seattle, Washington.

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/s/ Mark Calvert

Mark Calvert

CERTIFICATE OF SERVICE

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The undersigned declares as follows:

That she is a Paralegal in the law firm of K&L Gates LLP, and on June 15, 2018, she 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.

Also on June 15, 2018, she caused the foregoing document to be placed in the mail to the Parties at the addresses listed below:

Northwest Territorial Mint LLC
c/o Ross Hansen, Member
P.O. Box 2148
Auburn, WA 98071-2148

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.

Executed on the 15th day of June, 2018 at Seattle, Washington.

/s/ Denise A. Lentz
Denise A. Lentz

EXHIBIT A

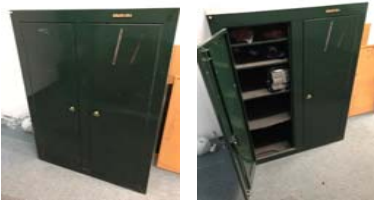
DAYTON MISCELLANEOUS PROPERTY



2006 HONDA PILOT



CHEVY TRUCK



GUN SAFE



REFRIGERATORS

DAYTON MISCELLANEOUS PROPERTY



METAL DETECTOR



WWII CAMERA F-56 ROLL MAGAZINE



LOT OF MICROWAVES



40 INCH VISIO TV FROM LIBRARY



LOT OF RETAIL MERCHANDISE FURNITURE

DAYTON MISCELLANEOUS PROPERTY



LOT OF SHREDDERS



2 PALLETS OF TRADE SHOW EQUIPMENT



74 ROLLS



STEEL BEADS

DAYTON MISCELLANEOUS PROPERTY



2 SINGER Sowing Machines



Air King Fileter System



3 Pallets Misc Wire



1 Pallet of Vacumm Hoses

DAYTON MISCELLANEOUS PROPERTY



Pallets of Misc Plating Tubes and Control Boxes



1 Pallet of Misc Control Boxes and Electrical Hookup Cases



Quarter Pallet of Pumice (Sandblast)

DAYTON MISCELLANEOUS PROPERTY



Pallet of Potters (Sandblast)



Trinco Mix (Sandblast)



TAR Crack Sealer and Boxes of Tar

GREEN BAY MISCELLANEOUS PROPERTY

338 (8) TOOL HOLDERS

359A FOREDOM SERIES SR ENGRAVER FOOT PEDAL CONTROL WITH BENCH, LIGHT, & CHAIR
359B FOREDOM SERIES SR ENGRAVER FOOT PEDAL CONTROL WITH BENCH, LIGHT, & CHAIR
359A FOREDOM SERIES SR ENGRAVER FOOT PEDAL CONTROL WITH BENCH, LIGHT, & CHAIR
359B FOREDOM SERIES SR ENGRAVER FOOT PEDAL CONTROL WITH BENCH, LIGHT, & CHAIR
359C VISE
359D VISE
359E VISE
359F CUTTER
359G SURFACE PLATE WITH GAUGE
359H 6' STEP LADDER & 2 WHEEL CART
359I (5) VACUMNS
359J 3 CHAIRS & 2 CABINETS
359K CONTENTS OF OFFICE 2 DESKS, 2 CHAIRS, 2 FILE CABINETS, COMPUTER & PRINTER
359L DESK, CHAIR, COMPUTER & 2 SCREENS
359M DESK, CHAIR, 2 COMPUTERS & 3 SCREENS
359N DESK, CHAIR, COMPUTER, SCREEN, & PRINTER
359O DRAWING DESK
359P BROTHER FAX WITH STAND & CABINET
359Q (2) LATERAL FILE CABINETS
359R WOOD BENCH
359S WORK BENCH
359T WORK BENCH
359U PLASTIC SHELVING
359V TABLE WITH 2 CHAIRS
359W 4 SHELF UNITS OF BLANKS
359X PLASTIC SHELF UNIT WITH SUPPLIES