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Honorable Christopher M. Alston
Chapter 11
Hearing Location: Seattle, Rm. 7206
Hearing Date: Friday, August 24, 2018
Hearing Time: 9:30 a.m.
Response Date: August 17, 2018

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8 UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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

Case No. 16-11767-CMA

NOTICE OF HEARING ON MOTION
FOR ORDER ESTABLISHING
DEADLINE FOR FILING
APPLICATIONS FOR PAYMENT OF
ADMINISTRATIVE CLAIMS AND
APPROVING FORM OF NOTICE
(For Claims Arising on or before 7/31/18)

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

17 PLEASE TAKE NOTICE that a hearing has been scheduled on **August 24, 2018, at 9:30 a.m.**
18 **(PT)** before the Honorable Christopher M. Alston, United States Bankruptcy Judge, in Courtroom 7206,
700 Stewart Street, Seattle, WA, 98101 on the Trustee's Motion for Order Establishing Deadline for Filing
19 Applications for Payment of Administrative Claims Against the Debtor (the "Motion"). Notice of the
Motion is shortened pursuant to Docket #1842.

20 The Trustee has liquidated the majority of the assets of the estate. The estate is administratively
insolvent, and is the Trustee is prepared to address the resolution of administrative claims in the course of his
21 administration of the case.

22 The Trustee proposes that the Court establish a deadline by which all holders of administrative claims
under 11 U.S.C. § 503(b) arising on or before July 31, 2018 must file an application for payment of such
23 administrative claims. The Trustee requests that such deadline be October 1, 2018 (the "Administrative
Claims Bar Date"). Separately, the Trustee intends to file a motion to address the process for resolving
24 disputed claims of employees under the Worker Adjustment and Retraining Notification Act ("WARN Act").
The Trustee proposes that the bar date for administrative claims of employees solely under the WARN Act
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26 NOTICE OF HEARING ON MOTION FOR ORDER
ESTABLISHING DEADLINE FOR FILING
APPLICATIONS FOR PAYMENT OF
ADMINISTRATIVE CLAIMS AGAINST DEBTOR - 1
501738362 v1

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925 FOURTH AVENUE
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1 will be November 15, 2018 (the “WARN Act Administrative Claims Bar Date”). The bar date for all other
2 administrative claims of employees would be the October 1, 2018 Administrative Claims Bar Date.

3 The Trustee proposes to provide notice of the Administrative Claims Bar Date to the following
4 individuals and entities: (i) all parties who have requested special notice in this case; (ii) the United States
5 Trustee; (iii) relevant taxing authorities; (iv) all vendors with whom the estate has conducted business on a
6 postpetition basis as reflected on vendor and payable records of the estate; (v) landlords of the estate who
7 leased spaced to the estate on a postpetition basis; (vi) any employees of the Debtor who were employed by
8 the estate on a postpetition basis; (vii) customers of the Debtor’s custom minting business who placed
9 postpetition orders as reflected in the estate’s records¹; and (viii) the members of the Official Unsecured
10 Creditors Committee and its counsel.

11 The Trustee requests that the Administrative Claims Bar Date not apply to the following:
12 (i) professionals retained in this case whose employment has been approved pursuant to 11 U.S.C. § 327; (ii)
13 any person or entity that has already properly filed an application for allowance of an administrative claim;
14 and (iii) any administrative claims arising after July 31, 2018.

15 The proposed form of notice regarding the Administrative Claims Bar Date is attached hereto as
16 Exhibit A (the “Notice”). The Trustee seeks approval of the form of the Notice.

17 PLEASE TAKE FURTHER NOTICE that copies of the Motion and related documents may be
18 (1) reviewed and copied at the Clerk of the United States Bankruptcy Court, 700 Stewart Street, Seattle, WA
19 98101 or (2) may be obtained by submitting a written request to Ms. Denise Lentz, Paralegal, K&L Gates,
20 LLP, 925 Fourth Avenue, Suite 2900, Seattle, WA 98104-1158, Email: denise.lentz@klgates.com.

21 PLEASE TAKE FURTHER NOTICE THAT IF YOU OPPOSE the Motion, you must file your
22 objection NO LATER THAN **Friday, August 17, 2018**. Objections must be filed with the Court, 700
23 Stewart Street, Seattle, WA, 98101, and a copy delivered to:

24
25 Michael J. Gearin
26 Brian T. Peterson
K&L Gates, LLP
925 Fourth Avenue, Suite 2900
Seattle, Washington 90104

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

¹ Customers will be notified by email or mail based on the customer contact information in the
company’s records.

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DATED this 10th day of August, 2018

K&L GATES LLP

By /s/Michael J. Gearin
Michael J. Gearin, WSBA #20982
David C. Neu, WSBA #33143
Brian T. Peterson, WSBA #42088
Attorneys for Mark Calvert, Chapter 11 Trustee

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