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UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re
Northwest Territorial Mint, LLC,
Debtor,

Case No. 16-11767-CMA

SUPPLEMENTAL DECLARATION OF
MARY E. OLSEN IN SUPPORT OF JOINT
MOTION FOR AN ORDER (1)
GRANTING CLASS CERTIFICATION
FOR PURPOSES OF SETTLEMENT
ONLY; (2) APPOINTING SETTLEMENT
CLASS REPRESENTATIVE AND
SETTLEMENT CLASS COUNSEL; (3)
PRELIMINARILY APPROVING THE
SETTLEMENT AGREEMENT BETWEEN
CLASS CLAIMANT, ON HER OWN
BEHALF AND ON BEHALF OF THE
SETTLEMENT CLASS; (4) APPROVING
THE FORM AND MANNER OF NOTICE
TO SETTLEMENT CLASS; (5)
SCHEDULING A FINAL FAIRNESS
HEARING FOR THE FINAL
CONSIDERATION AND APPROVAL OF
THE SETTLEMENT; AND (6) FINALLY,
APPROVING THE SETTLEMENT

I, Mary E. Olsen, declare as follows:

SUPPLEMENTAL DECLARATION OF OLSEN IN SUPPORT OF
JOINT MOTION FOR APPROVAL OF CLASS SETTLEMENT AND
RELATED RELIEF - 1

1
2 1. I am a member of The Gardner Firm, PC, one of the law firms appointed as
3 Settlement Class Counsel for Brittany Konkol (“Class Claimant”) and the individuals on the
4 attached Settlement Schedule (“Settlement Class Members”).

5 2. This declaration is submitted in further support of final approval of the Settlement
6 Agreement (Dkt. No. 1847-1 the “Settlement Agreement”), as requested in the Parties’ Joint
7 Motion For An Order (1) Granting Class Certification For Purposes Of Settlement Only; (2)
8 Appointing Settlement Class Representative And Settlement Class Counsel; (3) Preliminarily
9 Approving The Settlement Agreement Between Class Claimant, On Her Own Behalf And On
10 Behalf Of The Settlement Class; (4) Approving The Form And Manner Of Notice To Settlement
11 Class; (5) Scheduling A Final Fairness Hearing For The Final Consideration And Approval Of
12 The Settlement; And (6) Finally, Approving The Settlement (Dkt. No. 1847).

13 3. On September 14, 2018, the Court granted preliminary approval of the Joint
14 Motion.

15 4. Settlement Class Counsel prepared the approved Class Notice and personalized
16 Exhibit A to the Class Notice for each Settlement Class Member to reflect their projected allocation
17 of the Settlement Amount, after the deduction of Settlement Class Counsel’s Fees, Settlement
18 Class Counsel’s Expenses and the Service Payment.

19 5. On September 18, 2018, Settlement Class Counsel mailed the Class Notice, which
20 included the personalized Exhibit A and the opt-out form, to all Settlement Class Members.

21 6. Settlement Class Counsel used a \$6,000 expense total for purposes of calculating
22 the personalized Settlement Class Member allocations used in Exhibit A to the September 18, 2018
Class Notices. Settlement Class Counsel’s expenses in this matter actually exceed \$6,000, but the
Parties agreed in the Settlement Agreement that reimbursable expenses would be capped at that
amount (Settlement Agreement, para. 3). Settlement Class Counsel’s expenses related to the

1 mediation alone, totaled more than \$6,000 (i.e., \$4,460 to Schwabe Williamson & Wyatt
2 (mediator's firm), plus expenses of \$1769 related to attendance at the mediation, which total
3 \$6229). In addition to the mediation related expenses, Settlement Class Counsel incurred costs for
4 legal research; copies; postage (relating to noticing) and PACER charges.

5 7. The attached Settlement Schedule reflects the \$6,000 expense deduction and
6 includes the Settlement Class Member allocations which were used in Exhibit A to the
7 personalized Class Notices mailed to Settlement Class Members on September 18, 2018.

8 8. There were no opt-outs or objections to the Settlement.

9 9. The Parties agree that the attached, updated Settlement Schedule, containing the
10 Settlement allocation amount reflected in each Settlement Class Member's September 18, 2018
11 Class Notice, shall govern the Trustee's Settlement distributions in this matter.

12 10. In view of the foregoing and the Joint Motion, the Parties ask the Bankruptcy Court
13 to enter an order for the relief requested in the Joint Motion, and to approve all aspects of the
14 Settlement, including the use of the attached Settlement Schedule for purposes of the Trustee's
15 Settlement distribution.

16 I declare under penalty of perjury under the laws of the United States that the foregoing is
17 true and correct and that this declaration was executed on December 6, 2018 in Mobile,
18 Alabama.

19 /s/ Mary E. Olsen
Mary E. Olsen

CERTIFICATE OF SERVICE

I certify that on this 6th day of December, 2018, I caused the foregoing to be served via ECF to all parties who are listed on the Court’s Electronic Mail Notice List.

s/ Mary E. Olsen
Mary E. Olsen

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SUPPLEMENTAL DECLARATION OF OLSEN IN SUPPORT OF
JOINT MOTION FOR APPROVAL OF CLASS SETTLEMENT AND
RELATED RELIEF - 4

Northwest Territorial Mint Case: 16-11767CMA
Allocation of Settlement
As of September 18, 2018

Settlement Amount	\$125,000
Less: Promote Fee	(\$3,000)
Sub Total for Attorney Fee Calculation	\$122,000
Less: Legal Fees	(\$40,667)
Less: Estimated Expenses	(\$6,000)
Net Allocation to Employee's	\$75,333

#	Employee	Claim	Allocation
1	Adams, Steven G	\$13,371	(\$1,568)
2	Adolf, Jason W	\$6,773	(\$794)
3	Alcantara, Luis	\$4,697	(\$551)
4	Alcantara, Rosa	\$5,434	(\$637)
5	Allen, Summer J	\$4,080	(\$478)
6	Baldassare, Jesse	\$7,445	(\$873)
7	Baldwin, Noelle	\$8,819	(\$1,034)
8	Barnard, Warren S	\$15,300	(\$1,794)
9	Beasley, Susan K	\$4,250	(\$498)
10	Bennett, Gary M	\$4,590	(\$538)
11	Blas, John P	\$5,797	(\$680)
12	Bracamontes, Andrea	\$3,740	(\$439)
13	Braun, Danny L	\$9,635	(\$1,130)
14	Brunner, Jonathan	\$4,555	(\$534)
15	Burkard, Jeremy	\$8,737	(\$1,025)
16	Cacho-Bravo, Jorge	\$4,871	(\$571)
17	Carrasco, Eimy	\$4,420	(\$518)
18	Cazares, Maria T	\$4,385	(\$514)
19	Cedano, Norma	\$3,740	(\$439)
20	Colwell, Martin J	\$36,986	(\$4,337)
21	Davidson, Hallyma	\$4,080	(\$478)
22	Easley, Janet	\$4,895	(\$574)
23	Ebright, Stephen	\$4,725	(\$554)
24	Estrada, Irma C	\$3,856	(\$452)
25	Fall, Kimberly	\$6,033	(\$708)
26	Fergus, William F	\$8,215	(\$963)
27	Fields, Jodi	\$5,915	(\$694)
28	Fleet, Jason	\$5,745	(\$674)
29	Foreman, Dale	\$4,856	(\$570)
30	Freeman, Roger	\$11,107	(\$1,303)
31	Goss, Wendy	\$5,065	(\$594)
32	Hauff, Cynthia A	\$5,065	(\$594)

#	Employee	Claim	Allocation
33	Hook, James	\$6,530	(\$766)
34	Jacobs, Erica A	\$6,765	(\$793)
35	Jarrett, Nicole	\$4,843	(\$568)
36	Johns, Nathan	\$5,100	(\$598)
37	Johnson, Alan B	\$5,950	(\$698)
38	Johnson, Brenda L	\$8,072	(\$947)
39	Jones, Janette	\$5,950	(\$698)
40	Jones, Laura A	\$9,471	(\$1,111)
41	Jones, Randy W	\$10,505	(\$1,232)
42	Kenney, William B	\$9,913	(\$1,163)
43	Knight, Dane	\$4,555	(\$534)
44	Knight, William B	\$5,440	(\$638)
45	Konkel, Brittany Storm	\$5,405	(\$634)
46	Lord, Chris	\$9,961	(\$1,168)
47	Lozano, Alma	\$4,385	(\$514)
48	Madderra, Bobbi C	\$3,910	(\$459)
49	Mayer, Stephen	\$7,999	(\$938)
50	Maynard, Leslie	\$3,910	(\$459)
51	McVeigh, Mark A	\$11,033	(\$1,294)
52	Meinert, Gary H	\$9,635	(\$1,130)
53	Melendez, Lesley	\$6,214	(\$729)
54	Mena, Gloria	\$4,385	(\$514)
55	Meyers, Todd M	\$11,621	(\$1,363)
56	Millim, Lisa A	\$3,740	(\$439)
57	Montes, Margarita	\$3,740	(\$439)
58	Moore, Weyna D.G.	\$7,999	(\$938)
59	Morris, Patricia A	\$7,109	(\$834)
60	Munguia, Marisol	\$4,518	(\$530)
61	O'Connell, Kelly	\$5,065	(\$594)
62	Palsgrove, Katherine A	\$4,613	(\$541)
63	Pedro, Cynthia	\$8,496	(\$996)
64	Pernoll, Irina S	\$14,541	(\$1,705)
65	Perry, Jessica	\$4,080	(\$478)
66	Platt, Elizabeth	\$5,440	(\$638)
67	Proctor, Ashlee	\$4,080	(\$478)
68	Rainey, Alyssa	\$5,745	(\$674)
69	Ramirez, Blanca	\$4,511	(\$529)
70	Rayner, Deborah	\$5,944	(\$697)
71	Robinson, Donna L	\$7,445	(\$873)
72	Rodriguez, Juan	\$6,255	(\$734)
73	Rojas, Rafael	\$5,235	(\$614)
74	Ronk, Wesley	\$6,765	(\$793)
75	Rosales, Antonio	\$5,604	(\$657)

#	Employee	Claim	Allocation
76	Saenz, Ana	\$4,518	(\$530)
77	Scott, Kathy	\$4,385	(\$514)
78	Semler, Mitchell	\$5,300	(\$621)
79	Serpa, Lindsey	\$4,725	(\$554)
80	Sharp, Jeremy	\$5,440	(\$638)
81	Shear, Erin	\$8,819	(\$1,034)
82	Swinburg, Cathy	\$6,454	(\$757)
83	Thompson, David	\$5,610	(\$658)
84	Tirri, Christopher	\$7,183	(\$842)
85	Villegas, Alma R	\$4,080	(\$478)
86	Waldrep, Bobby L	\$4,080	(\$478)
87	Webb, Christopher	\$5,405	(\$634)
88	White, Michael	\$15,357	(\$1,801)
89	Williams, Jeremiah	\$5,235	(\$614)
90	Williams, Nicole	\$5,183	(\$608)
91	Wilson III, Richard L	\$15,699	(\$1,841)
92	Zepeda, Monica Y	\$3,740	(\$439)
<u>Employee's Terminated After 12/29</u>			
93	Alves, Zachary J	\$692	(\$81)
94	Davis, Debra S	\$5,685	(\$667)
95	Fleet, Kathyjean	\$986	(\$116)
96	Hooper, Nicole	\$884	(\$104)
97	Lee, Matthew	\$4,616	(\$541)
98	Leffler, Travis	\$1,341	(\$157)
99	Timm, Dennis	\$1,719	(\$202)
100	Webb, Alisha	\$1,581	(\$185)
		<u>\$642,376</u>	<u>(\$75,333)</u>