

Honorable Christopher M. Alston  
Hearing Date: October 18, 2019  
Hearing Time: 9:30 a.m.  
Location: Seattle  
Chapter 11

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re  
NORTHWEST TERRITORIAL MINT LLC,  
Debtor.

No. 16-11767  
SUPPLEMENTAL RESPONSE IN  
SUPPORT OF NORTHWEST  
TERRITORIAL MINT LLC'S MOTION TO  
APPROVE SETTLEMENT WITH  
BRADLEY STEPHEN COHEN AND  
COHEN ASSET MANAGEMENT AND  
KATHRYN A. ELLIS AND TO  
AUTHORIZE SALE OF SEIZED  
PROPERTY

COMES NOW Kathryn A. Ellis, the Chapter 7 Trustee of the bankruptcy estate of Diane Erdmann, Bk. No. 19-41238, by and through the undersigned attorney, and submits the attached Declaration of Trustee (Exhibit 1) and Declaration of Christopher G. Williams (Exhibit 2) that have been filed in the Erdmann estate (Bk. No. 19-41238, Docket Nos. 85 and 86, respectively) in supplement to the Response in support of Northwest Territorial Mint LLC's Motion to Approve Settlement with Bradley Stephen Cohen and Cohen Asset Management and Kathryn A. Ellis and to Authorize Sale of Seized Property (Docket No. 2131).

DATED this 17<sup>th</sup> day of October, 2019.

/s/ Kathryn A. Ellis  
Kathryn A. Ellis, WSBA #14333  
Attorney for Trustee

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**SUPPLEMENTAL RESPONSE IN SUPPORT OF NORTHWEST TERRITORIAL  
MINT LLC'S MOTION TO APPROVE SETTLEMENT WITH BRADLEY  
STEPHEN COHEN AND COHEN ASSET MANAGEMENT AND KATHRYN  
A. ELLIS AND TO AUTHORIZE SALE OF SEIZED PROPERTY - 1**

**KATHRYN A. ELLIS PLLC**  
5506 6<sup>th</sup> Ave S  
Suite 207  
Seattle, WA 98108  
(206) 682-5002

# EXHIBIT 1

Honorable Mary Jo Heston  
Hearing Date: October 22, 2019  
Hearing Time: 9:00 a.m.  
Response Date: October 15, 2019  
Location: Tacoma  
Chapter 7

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re

No. 19-41238

DIANE ERDMANN,

Debtor.

DECLARATION OF TRUSTEE IN  
SUPPORT OF REPLY TO OBJECTIONS  
OF ERDMANN AND PEHL TO MOTION  
TO APPROVE SETTLEMENT AND SALE  
OF ESTATE'S INTEREST IN COIN AND  
METAL INVENTORY

Kathryn A. Ellis declares and states as follows:

1. I am the Trustee in this matter and have testimonial knowledge of the facts set forth in this declaration.

2. After buyer Bellevue Rare Coins was located, I drafted a solicitation letter directed to businesses in the coin and precious metal buying trades. The highest and best offer I have received is from American Rarities Rare Coin Company in the amount of \$147,000. This offer is not subject to the buyer's inspection of the inventory. Presently, I am circulating that offer to the other potentially interested buyers, including the proposed buyer in the motion,

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**DECLARATION OF TRUSTEE IN SUPPORT OF REPLY  
TO OBJECTIONS OF ERDMANN AND PEHL TO  
MOTION TO APPROVE SETTLEMENT AND SALE OF  
ESTATE'S INTEREST IN COIN AND METAL INVENTORY - 1**

KATHRYN A. ELLIS PLLC  
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Bellevue Rare Coin, to determine whether any higher bids or offers will be made up to or at the time of the hearing.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Dated this 17<sup>th</sup> day of October, 2019 at Seattle, Washington.

By: /s/ Kathryn A. Ellis  
Kathryn A. Ellis

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**DECLARATION OF TRUSTEE IN SUPPORT OF REPLY  
TO OBJECTIONS OF ERDMANN AND PEHL TO  
MOTION TO APPROVE SETTLEMENT AND SALE OF  
ESTATE'S INTEREST IN COIN AND METAL INVENTORY - 2**

**KATHRYN A. ELLIS PLLC**  
5506 6<sup>th</sup> Ave S  
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Seattle, WA 98108  
(206) 682-5002

# EXHIBIT 2

Honorable Mary Jo Heston  
Hearing Date: October 22, 2019  
Hearing Time: 9:00 a.m.  
Response Date: October 15, 2019  
Location: Tacoma  
Chapter 7

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re:

No. 19-41238

DIANE ERDMANN,

Debtor.

DECLARATION OF CHRISTOPHER G.  
WILLIAMS IN SUPPORT OF REPLY TO  
OBJECTIONS OF ERDMANN AND PEHL  
TO MOTION TO APPROVE SETTLEMENT  
AND SALE OF ESTATE'S INTEREST IN  
COIN AND METAL INVENTORY

Christopher G. Williams, declares and states as follows:

1. I am the assistant to the Trustee herein, have testimonial knowledge of the facts set forth in this declaration and competent to testify thereto.

2. The Trustee drafted a solicitation letter and directed me to send that to businesses in the coin and precious metal buying trades. I conducted an online investigation for possible business and, where email addresses or fax numbers were not posted on their websites, called such businesses to obtain their contact information. Attached hereto as Exhibit 1 is my tracking list of to whom, when, and how the Trustee's letter was sent, together with the parties' responses as they have been received, if any to date.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Dated this 16<sup>th</sup> day of October, 2019 at Seattle, Washington.

By: /s/ Christopher G. Williams

Christopher G. Williams

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**DECLARATION OF CHRISTOPHER G. WILLIAMS IN  
SUPPORT OF REPLY TO OBJECTIONS OF ERDMANN AND  
PEHL TO MOTION TO APPROVE SETTLEMENT AND SALE OF  
ESTATE'S INTEREST IN COIN AND METAL INVENTORY - 1**

KATHRYN A. ELLIS PLLC  
5506 6<sup>th</sup> Ave S  
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Seattle, WA 98108  
(206) 682-5002

# EXHIBIT 1

Sent 10/4/2019

Renton Coin Shop Inc.	Email
Northgate Rare Coins & Precious Metals	Email
The Gold Center Inc.	Email
Sound Gold Buyers	Email
The Coin Market LLC	Email
Redmond Rare Coins	Email (2 addresses)
American Rarities Rare Coin Company	Email
Cash for Gold	Email
Market Coins & Collectibles	Email
Pacific Iron & Metal	Facsimile

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Sent 10/7/2019

Seattle Coin Shop	Email
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Sent 10/11/2019

Coin & Stamp Shop	Email
LJR Coins	Email
Tacoma Mall Blvd Coin & Stamp	Email
Pinnacle Rarities	Email
B&I Coin Shop	not interested (but referred me to American Coin & Vault)
American Coin & Vault	Email

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Sound Gold Buyers	10/5/19 email saying no thank you.
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Renton Coin Shop Inc.	10/4 VM - interested in bidding 10/15 email - <b>\$135,235 bid; requests inspection</b>
American Rarities Rare Coin Company	10/4 T/C - will send offer 10/7/19 10/10 email - <b>\$147,500 bid</b>
Redmond Rare Coins	10/7 T/C - will send soft bid, subject to inspection 10/8 email - <b>\$130,000 bid; requests inspection</b>
Pacific Iron & Metal	10/9 T/C - will send email confirming interest, but will require inspection first 10/10 email - notice of interest; requests inspection
Seattle Coin Shop	10/10 email - notice of interest; requests inspection
Coin & Stamp Shop	10/11 email - notice of interest
LJR Coins	10/15 email (2) - notice of interest 10/15 email - <b>\$128,300 bid</b>