1	BUCKNELL STEHLIK & SATO, LLP	JUDGE: DATE:	Christopher M. Alston Ex Parte			
2	2003 Western Avenue, Suite 400 Seattle, Washington 98121 (206) 587-0144 • fax (206) 587-0277	TIME: CHAPTER: LOCATION:	Ex Parte 11 Seattle			
3		RESPONSE I				
5						
6	UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WASHINGTON, AT SEATTLE					
7						
8	In re:	) No. 16-1	1767-CMA			
9	NORTHWEST TERRITORIAL MINT, LLC,	/	LIC ART COMPANY'S EX APPLICATION FOR			
10	Debtor.	) ORDER	AUTHORIZING VERY PURSUANT TO			
11		,	UPTCY RULE 2004			
12		)				
13	COMES NOW Medallic Art Company LLC ("Medallic") and requests entry of an order in					
14 15	the form accompanying this Application, pursuant to Fed. R. Bankr. Proc. 2004 and 9016 (the latter					
16	making Fed D. Civ. Prog. 45 applicable in actions under the Code), authorizing the following					
17	discovery and directing third parties to cooperate with the same:					
18	A Subpoena Duces Tecum directing the production of documents by Allison MacKenzie Ltd.					
19	as described in proposed Exhibit A attached hereto, which generally refer or relate to					
20	Medallic (or affiliates thereof), Debtor, Ross Hansen, Richard Bressler, the Leasehold					
21	Premises located upon real property with a common address of 80 Airpark Vista Roulevard					
22						
23						
24	1 V					
25 26	The documents Medaine seeks relate to the mistory, intent, rights and obligations of interested					
27	Medallic Art Company LLC Application for Order		BUCKNELL STEHLIK & SATO, LLP 2003 Western Avenue, Suite 400 Seattle, Washington 98121			
98	Authorizing Rule 2004 Discovery - 1		(206) 587-0144 • fax (206) 587-0277			

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1	parties in this matter respecting personal and real property interests in property or assets claimed to				
2	be property of the Debtor, as well as the negotiation, drafting and execution of purchase agreements				
3	and/or lease agreements and related relationships between Medallic and other interested parties				
4	herein, including the Debtor.				
5	Bankruptcy Rule 2004 authorizes the Court to order the examination of any entity, including				
6 7	the Debtor, and to compel the production of relevant documents. The scope of the examination				
8	authorized by Rule 2004 is exceedingly broad, including matters relating to "the acts, conduct, or				
9	property or to the liabilities and financial condition of the debtor, or to any matter which may affect				
10	the administration of the debtor's estate, or to the debtor's right to a discharge." Further, in cases				
11 12	under Chapter 11 of the Code, the examination				
13	may also relate to the operation of any business and the desirability of its continuance, the source of any money or property acquired or to be acquired by the debtor for purposes of consummating a plan and the consideration given or offered therefore, and <i>any other matter relevant to the case</i> or to the formulation of a plan.				
14					
<ul><li>15</li><li>16</li></ul>	Rule 2004(b). (Emphasis added.) Attendance at a deposition or the production of documents must				
17	be compelled by subposes pursuent to Pule 0016 and Federal Pule of Civil Procedure 45. Pule				
18					
19	Medallic's proposed discovery falls clearly within the scope of discovery authorized by Rule				
20	2004. The Debtor claims that both the leasehold interest of and certain personal property assets				
21	located on the Leased Premises are property of the Debtor. Medallic contends that both the				
<ul><li>22</li><li>23</li></ul>	leasehold interest and the property located thereon belong to Medallic or its owners				
24					
25	Medallic (or affiliates thereof) in preparing the instruments by which the disputed real and personal				
26	BUCKNELL STEHLIK & SATO, LLP				
27 28	Medallic Art Company LLC Application for Order  Authorizing Rule 2004 Discovery - 2  2003 Western Avenue, Suite 400  Seattle, Washington 98121  (206) 587-0144 • fax (206) 587-0277				

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1	property interests were acquired and thereafter handled and such files are believed to contain other			
2	documentary evidence relevant to the parties' claimed ownership and interest, intent of the lessor,			
3	lessee, purchaser and other parties, as well as other matters pertinent to this bankruptcy case.			
4	For the reasons stated above, Medallic respectfully requests that the Court order the			
5	requested discovery under Rule 2004. A proposed order, along with Exhibit A to the intended			
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7				
8	DATED this 21st day of June 2016.			
9	BUCKNELL STEHLIK & SATO, LLP			
10				
11	/s/ Jerry N. Stehlik Jerry N. Stehlik, WSBA #13050			
12	of Attorneys for Medallic Art Company, LLC			
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27	BUCKNELL STEHLIK & SATO, LLP 2003 Western Avenue, Suite 400			
28	Medallic Art Company LLC Application for Order  Authorizing Rule 2004 Discovery - 3  Seattle, Washington 98121  (206) 587-0144 • fax (206) 587-0277			