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Honorable Christopher M. Alston  
Chapter 11  
Hearing Location: Seattle, Rm. 7206  
Hearing Date: Friday, July 22, 2016  
Hearing Time: 9:30 a.m.  
Response Date: July 15, 2016

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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  
TRUSTEE'S MOTION FOR ORDER  
HOLDING ROSS HANSEN IN  
CONTEMPT FOR VIOLATION OF  
AUTOMATIC STAY

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

17 PLEASE TAKE NOTICE that a hearing has been scheduled on **July 22, 2016, at 9:30 a.m. (PT)**  
18 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 Holding Ross Hansen in Contempt  
for Violation of Automatic Stay (the "Motion").

19 On April 11, 2016, Mark Calvert was appointed as chapter 11 Trustee (the "Trustee") of the  
20 bankruptcy of Northwest Territorial Mint, LLC (the "Debtor" or "NWTM"). Upon his appointment,  
21 Mr. Calvert took control over the business operations of the NWTM. The business records of the  
22 Debtor are in complete disarray. The Debtor has not prepared financial statements or filed a tax  
return since 2011. There was no reliable inventory of precious metals or cash when the Trustee was  
23 appointed. The Trustee immediately took an inventory of assets of the company including precious  
metals inventory and secured those assets by changing locks and access codes on secured vault  
24 areas.

25 The former Chief Executive Officer of NWTM, Ross Hansen objected to the Trustee's  
26 control over the business. The day after the Trustee was appointed, and following the Trustee's  
exercise of control over storage vaults and other aspects of the business, Mr. Hanson resigned from

NOTICE OF HEARING ON TRUSTEE'S MOTION FOR  
ORDER HOLDING ROSS HANSEN IN CONTEMPT FOR  
VIOLATION OF AUTOMATIC STAY - 1

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1 employment with the Debtor. Mr. Hansen informed the Trustee that he intends gain control over the  
2 Debtor's assets and take over the operations of the Debtor through an entity he controls, Medallion  
3 Art Company, LLC. Over the past two months, Mr. Hansen has repeatedly taken steps to exercise  
4 control over assets of the bankruptcy estate, disrupt the business operations of the estate, and  
5 otherwise interfere with the Trustee's efforts to rehabilitate the NWTM business.

6 In particular, Mr. Hansen has contacted employees of the Debtor seeking to have them  
7 leave their employment with the Debtor. Mr. Hansen contacted an employee of the Debtor and  
8 solicited her to disable critical manufacturing equipment of the Debtor, destroy certain engraving  
9 records, and provide copies of the destroyed records to Mr. Hansen. Mr. Hansen has appeared at  
10 the business premises of the Debtor seeking to take control over certain business records under  
11 false pretenses. Mr. Hansen has continued to contact employees in order to mislead and intimidate  
12 them.

13 On the day after his appointment, the Trustee discovered that Mr. Hansen and his girlfriend  
14 shipped six boxes of coins, collectible medallions and other precious metals from the Debtor's  
15 Federal Way, Washington offices to the Dayton, Nevada premises of the Debtor for the purpose of  
16 secreting them from the Trustee. At least some, if not all of the materials in the shipped boxes  
17 were purchased by the Debtor.

18 By the Motion, the Trustee requests the Court hold Mr. Ross Hansen in contempt for willful  
19 violation of the automatic stay provided for in 11 U.S.C. § 362 and for willful violation of the  
20 Court's order appointing the Trustee. The Trustee also requests that the Court award the Trustee  
21 reasonable attorney's fees and costs in an amount to be proven upon the submission of evidence  
22 supporting such fees and costs.

23 PLEASE TAKE FURTHER NOTICE that copies of the Motion and related documents may be  
24 (1) reviewed and copied at the Clerk of the United States Bankruptcy Court, 700 Stewart Street, Seattle, WA  
25 98101 or (2) may be obtained by submitting a written request to Ms. Denise Evans, Paralegal, K&L Gates,  
26 LLP, 925 Fourth Avenue, Suite 2900, Seattle, WA 98104-1158, Email: denise.evans@klgates.com.

PLEASE TAKE FURTHER NOTICE THAT IF YOU OPPOSE the Motion, you must file your  
written objection NO LATER THAN **Friday, July 15, 2016 at midnight (PT)**. Objections must be filed  
with the Court, 700 Stewart Street, Seattle, WA, 98101, and a copy delivered to:

Michael J. Gearin  
K&L Gates, LLP  
925 Fourth Avenue, Suite 2900  
Seattle, Washington 98104  
Fax: (206) 370-6012

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

NOTICE OF HEARING ON TRUSTEE'S MOTION FOR  
ORDER HOLDING ROSS HANSEN IN CONTEMPT FOR  
VIOLATION OF AUTOMATIC STAY - 2

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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.

DATED this 28th day of June, 2016.

K&L GATES LLP

By /s/ Michael J. Gearin  
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Attorneys for Mark Calvert, Chapter 11 Trustee