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BUCKNELL STEHLIK & SATO, LLP
2003 Western Avenue, Suite 400
Seattle, Washington 98121
(206) 587-0144 • fax (206) 587-0277

JUDGE: Christopher M. Alston
DATE: July 22, 2016
TIME: 9:30 a.m.
CHAPTER: 11
LOCATION: Seattle
RESPONSE DATE: July 15, 2016

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON, AT SEATTLE

| | | |
|----------------------------------|---|-----------------------------------|
| In re: |) | No. 16-11767-CMA |
| |) | |
| NORTHWEST TERRITORIAL MINT, LLC, |) | DECLARATION OF ANDREA D. |
| |) | ORTH RE NO OBJECTION TO |
| Debtor. |) | MEDALLIC ART COMPANY |
| |) | LLC'S EX PARTE APPLICATION |
| |) | FOR ORDER AUTHORIZING |
| |) | DISCOVERY PURSUANT TO |
| |) | BANKRUPTCY RULE 2004 |

I, Andrea D. Orth, declare and state as follows:

1. I am one of the lawyers of Bucknell Stehlik & Sato, LLP ("BSS"). I am over the age of 18 and I am competent to testify to the contents of this declaration. I make this declaration in support of Medallic Art Company, LLC's ("Medallic") Ex Parte Application for Order Authorizing Discovery Pursuant to Bankruptcy Rule 2004 ("2004 Application"), and specifically, a subpoena duces tecum to be issued to the law firm of Allison MacKenzie, Ltd. ("the Law Firm").

2. The only party responding to Medallic's 2004 Application was the Trustee who filed a response contending that the Law Firm represented the Debtor as to certain matters and raising a concern regarding the possibility of invasion of the attorney-client privilege. Thereafter and by Order dated June 24 2016, this Court requested that the 2004 Application be noted for hearing and

1 that notice of the same be issued to certain interested parties.

2 3. Pursuant to such Order, BSS filed with the Court and served on the entities or persons
3 identified by the Court a Notice of Hearing on Medallic's 2004 Application for July 22, 2016 at 9:30
4 am. *See Notice of Hearing* [Docket #470] and *Proof of Service* [Docket #471]. The Notice of
5 Hearing stated that the due date for any responses to the 2004 Application was Friday July 15, 2004.
6

7 4. Other than the Trustee's initial response (referenced in ¶ 2 above), no responses or
8 objections were filed with the Court, and none were received by BSS (counsel for Medallic) as of
9 the date of this declaration. Further, Medallic and the Trustee have resolved concerns regarding the
10 2004 Application by agreeing that neither party is waiving the attorney-client privilege applicable to
11 the documents and all such privileges are expressly preserved. As indicated by countersignature on
12 the Agreed Order filed herewith, both Medallic and the Trustee jointly desire that an order
13 compelling such production be issued, ordering production of the documents in Seattle, Washington
14 to counsel for the Trustee within seventy-two (72) hours of the entry of the order.
15

16 5. Accordingly and pursuant to the above agreements with counsel for the Trustee, BSS
17 does not believe there is any dispute or objection to the 2004 Application and respectfully requests
18 that the Court enter the Agreed Order.
19

20 I declare under penalty of perjury under the laws of the State of Washington that the
21 foregoing is true and correct to the best of my knowledge and information.

22 DATED this 18th day of July, 2016.
23

24 /s/ Andrea D. Orth

25 Andrea D. Orth

26
27 Declaration of Andrea D. Orth re No Objection to Medallic
28 2004 Application - 2

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Seattle, Washington 98121
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