1 2 3 4 5 6 7 UNITED STATES BANKRUPTCY COURT 8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 9 10 In re: Case No. 16-11767-CMA 11 NORTHWEST TERRITORIAL MINT, LLC, REPLY DECLARATION OF MARK CALVERT IN SUPPORT OF MOTION 12 Debtor. FOR ORDER HOLDING ROSS HANSEN IN CONTEMPT FOR 13 VIOLATION OF AUTOMATIC STAY 14 15 I, Mark Calvert, hereby declare as follows: I am the Chapter 11 Trustee ("Trustee") of the Debtor, Northwest Territorial Mint, 16 1. LLC ("Debtor" or "NWTM"). I submit this reply declaration in support of my Motion for Order 17 Holding Ross Hansen in Contempt for Violation of the Automatic Stay (the "Motion"), and as 18 19 further support for my assertion that the six boxes shipped by Ross Hansen to Dayton, Nevada on 20 the eve of my appointment contained property that was purchased by the Debtor and is property of 21 the bankruptcy estate.

2. I am presently in Dayton, Nevada, meeting with employees and other parties in connection with the business of the estate. While here, I re-inspected the contents of the six boxes that were shipped by Ms. Erdmann to Dayton on or about April 8, 2016. I compared the contents of the boxes with the purchase order to Mr. Robert Lee (the "Lee Purchase Order") which was in the

REPLY DECLARATION OF MARK CALVERT IN SUPPORT OF MOTION FOR ORDER HOLDING ROSS HANSEN IN CONTEMPT FOR VIOLATION OF AUTOMATIC STAY - 1

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one of the shipped boxes when they were opened and a copy of which is attached as <u>Exhibit B</u> to my original declaration. The Lee Purchase Oder evidences the Debtor's purchase of certain items from Mr. Robert Lee, including ninety-four .999 fine miscellaneous sports items. I have reviewed the Debtor's banking records and confirmed that the Debtor paid Mr. Lee for the items ordered by the Debtor which are the subject of the Lee Purchase Order.

- 3. The Lee Purchase Order was enclosed in an envelope in one of the six boxes which Ms. Erdmann shipped to Dayton on April 8, 2016. The Lee Purchase order contains a line-item for "Silver 999 MISCELLANEOUS SPORTS." The envelope in which the Lee Purchase Order was found also contained certificates of authenticity for certain sports memorabilia medallions made of .999 fine silver. For example, there are multiple certificates of authenticity for sports figures such as Ken Griffey, Jr.
- 4. I was able to locate, in the six boxes, some of the commemorative coins identified by the certificates of authenticity, including multiple Ken Griffey, Jr. commemorative coins. Attached hereto as Exhibit A are pictures of the Lee Purchase Order, certificates of authenticity, and some of the commemorative sports medallions that were contained in the six boxes.
- 5. This review of the contents of the six boxes has confirmed my belief that the six boxes contain property of the bankruptcy estate. As stated in my previous declaration, I am certain that Mr. Hansen directed the shipment of the six boxes to Dayton for the purposes of secreting them from me and obtaining his control over their contents.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 2nd day of August, 2016, at Dayton, Nevada.

<u>/s/ Mark Calvert</u> Mark Calvert

REPLY DECLARATION OF MARK CALVERT IN SUPPORT OF MOTION FOR ORDER HOLDING ROSS HANSEN IN CONTEMPT FOR VIOLATION OF AUTOMATIC STAY - 2

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CERTIFICATE OF SERVICE

The undersigned declares as follows:

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That she is a practice assistant in the law firm of K&L Gates LLP, and on August 2, 2016, she caused the foregoing document to be filed electronically through the CM/ECF system which caused Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic Filing.

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

Executed on the 2nd day of August, 2016 at Seattle, Washington.

/s/ Denise A. Evans
Denise A. Evans

REPLY DECLARATION OF MARK CALVERT IN SUPPORT OF MOTION FOR ORDER HOLDING ROSS HANSEN IN CONTEMPT FOR VIOLATION OF AUTOMATIC STAY - 3

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