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UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:

NORTHWEST TERRITORIAL MINT, LLC,

Debtor.

Case No. 16-11767-CMA

REPLY DECLARATION OF
PATRICK K. MANNELLY IN
SUPPORT OF MOTION FOR ORDER
HOLDING ROSS HANSEN IN
CONTEMPT FOR VIOLATION OF
AUTOMATIC STAY

I, Patrick K. Mannelly, hereby declare as follows:

1. I am an Executive Director of Northwest Territorial Mint, LLC (“Debtor” or “NWTM”). I have been employed by the Debtor currently as Executive Director and previously as a manufacturing and systems consultant. I work in the facility in Federal Way, Washington. I submit this declaration in support of Mark Calvert (the “Trustee”), the duly appointed Chapter 11 Trustee’s Motion for Order Holding Ross Hansen in Contempt for Violation of Automatic Stay.

2. Just days prior to the Trustee taking control of the company prior to April 11, either on April 7 or April 8 in the afternoon following lunch, in the presence of Paul Wagner, Dave Huffman, Maura Richardson, and myself, Ross Hansen declared that he would “beat Mark Calvert to death with a baseball bat” if he led him astray.

REPLY DECLARATION OF PATRICK
K. MANNELLY IN SUPPORT OF MOTION FOR
ORDER HOLDING ROSS HANSEN IN
CONTEMPT FOR VIOLATION OF AUTOMATIC
STAY - 1

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

EXECUTED this 2nd day of August, 2016.

/s/ Patrick K. Mannelly
Patrick K. Mannelly
Doctor of Management (DM)

REPLY DECLARATION OF PATRICK
K. MANNELLY 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:

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 PATRICK
K. MANNELLY IN SUPPORT OF MOTION FOR
ORDER HOLDING ROSS HANSEN IN
CONTEMPT FOR VIOLATION OF AUTOMATIC
STAY - 3

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