

Honorable Christopher M. Alston
Chapter 11
Hearing Location: Room 7206
Hearing Date: August 5, 2016
Hearing Time: 9:30 a.m.

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re:

NORTHWEST TERRITORIAL MINT, LLC,

Debtor.

Case No. 16-11767-CMA

RESPONSE TO TRUSTEE'S MOTION TO
STRIKE SUPPLEMENTAL
MEMORANDUM FILED BY ROSS
HANSEN

The Trustee was unavailable for his deposition until July 27 or 28, shortly before Mr. Hansen's response to the Trustee's motion was due. The late date of Mr. Calvert's availability necessitated taking the depositions of the other declarants on July 29. The Trustee's counsel declined to move the hearing beyond August 5 to allow deposition transcripts to become available for Mr. Hansen's response. Rather than trouble the Court with a yet another motion (i.e., to renege the hearing, which Mr. Gearin indicated he would oppose), Mr. Hansen's counsel indicated to counsel and in its brief that Mr. Hansen's response would be supplemented. The Trustee cannot now complain about the submission of his deposition transcript and that of the other declarants.


The Court should deny the motion to strike. In the alternative, if the Trustee wants time to respond to explain the deposition testimony of Mr. Calvert and other witnesses, Mr. Hansen has no objection to moving the hearing date.

1 Respectfully submitted this 4th day of August, 2016.

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4 By /s/ Ragan L. Powers
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10 Attorneys for Ross Hansen