1 2 3 4 5 6	Michael J. Gearin, wsBA # 20982 David C. Neu, wsBA # 33143 Brian T. Peterson, wsBA # 42088 K&L GATES LLP 925 Fourth Avenue, Suite 2900 Seattle, WA 98104-1158 (206) 623-7580
7 8 9	UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE
10	In re: Case No. 16-11767-CMA
11	NORTHWEST TERRITORIAL MINT, LLC, SUPPLEMENTAL DECLARATION OF
12	BRIAN T. PETERSON IN SUPPORT
13	Debtor. OF MOTION FOR ORDER GRANTING AUTHORITY TO RETURN STORED INVENTORY,
14	OTHER CUSTOMER OWNED INVENTORY, AND COINING DIES
15	IN VENTOR 1, AND COINING DIES
16	I, Brian T. Peterson, hereby declare as follows:
17	1. I am an attorney in the law firm of K&L Gates LLP ("K&L Gates") and am duly
18	authorized to practice law in this Court. I submit this declaration in support of the Trustee's
19	Motion for Order Granting Authority to Return Stored Inventory, Other Customer Owned
20	Inventory, and Coining Dies (the "Motion"). I am over eighteen (18) years of age, and I am
21	competent in all ways to testify.
22	2. Northwest Territorial Mint, LLC (the " <u>Debtor</u> " or " <u>NWTM</u> ") owns and possesses
23	dies it uses to produce custom-made products (the "Coining Dies"). By the Motion, the Trustee
24	seeks to return certain Coining Dies purchased by Rayburn D. Pollard, Jr. that are not property of
25	the estate. On May 23, 2016, Mr. Pollard filed an Objection to Discharge of Certain Assets in
	SUPPLEMENTAL DECLARATION OF BRIAN T. PETERSON IN SUPPORT OF MOTION FOR ORDER GRANTING AUTHORITY TO RETURN STORED INVENTORY, OTHER CUSTOMER OWNED INVENTORY, AND COINING DIES - 1 K:\2070561\00001\22732_BTP\22732P220R K:\2070561\00001\22732_BTP\22732P220R Case 16-11767-CMA Doc 607 Filed 08/12/16 Ent. 08/12/16 16:20:59 Pg. 1 of 3

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1	the Debtors Control and Motion for an Order Compelling Trustee to Comply (the "Objection")
2	(Dkt. 295). The Objection filed by Mr. Pollard includes his proof of ownership of the Coining
3	Dies.
4	I declare under penalty of perjury that the foregoing is true and correct.
5	EXECUTED this 12th day of August, 2016, at Seattle, Washington.
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7	<u>/s/ Brian T. Peterson</u> Brian T. Peterson
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	SUPPLEMENTAL DECLARATION OF BRIAN T. PETERSON IN SUPPORT OF MOTION FOR ORDER GRANTING AUTHORITY TO RETURN STORED INVENTORY, OTHER CUSTOMER OWNED INVENTORY, AND COINING DIES - 2 K:\2070561\00001\22732_BTP\22732P220R K:\2070561\00001\22732_BTP\22732P220R Eilod 08/12/16 Ent 08/12/16 16:20:50 PG 2 of 2
	Case 16-11767-CMA Doc 607 Filed 08/12/16 Ent. 08/12/16 16:20:59 Pg. 2 of 3

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2	CERTIFICATE OF SERVICE
3	The undersigned declares as follows:
4 5	That she is a paralegal in the law firm of K&L Gates LLP, and on August 12, 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
6	
7	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.
8	Executed on the 12th day of August, 2016 at Seattle, Washington.
9	<u>/s/ Denise A. Evans</u> Denise A. Evans
10	Denise A. Evans
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	SUPPLEMENTAL DECLARATION OF BRIAN T. PETERSON IN SUPPORT OF MOTION FOR ORDER GRANTING AUTHORITY TO RETURN STORED INVENTORY, OTHER CUSTOMER OWNED INVENTORY, AND COINING DIES - 3 K:\2070561\00001\22732_BTP\22732P220R K:\2070561\00001\22732_BTP\22732P220R Eiled 00/122/14C First 00/122/14C 10:20250 Dr. 2. cf 20
	Case 16-11767-CMA Doc 607 Filed 08/12/16 Ent. 08/12/16 16:20:59 Pg. 3 of 3