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Honorable Christopher M. Alston
Chapter 11
Hearing Date: September 30, 2016
Hearing Time: 9:30 a.m.
Response Date: September 28, 2016
Location: Seattle, Room 7206

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re
NORTHWEST TERRITORIAL MINT, LLC,
EIN: 30-0143641

Debtor.

Case No. 16-11767-CMA

RESPONSE OF THE OFFICIAL
UNSECURED CREDITORS'
COMMITTEE TO TRUSTEE'S MOTION
TO APPROVE TERMS OF
EMPLOYMENT FOR PRODUCTION
MANAGER

The Official Unsecured Creditors Committee (the "Committee"), by its undersigned counsel, responds as follows to the Trustee's Motion to Approve Terms of Employment for Production Manager (Dkt. #711; the "Employment Motion"):

- 1.) The Committee supports the Employment Motion.
- 2.) The claims bar date in this case was September 1, 2016. The Committee understands that the total amount of claims filed was approximately \$85 million, the vast bulk of which are unsecured. Examination of the claims will likely identify duplications, errors and discrepancies that will ultimately reduce the total amount of allowed claims to an amount less than \$85 million; but it is painfully obvious that creditors in this case face enormous losses.
- 3.) The Committee believes that any meaningful recovery for creditors must come from a reorganized and ongoing business operation; and the Committee recognizes that achieving this result will require resolution of a number of issues currently before the Court,

1 including the determination of the ownership of certain Medallic Art Company LLC assets and
2 the assumption of the Debtor's Dayton, Nevada, lease.

3 4.) The Committee also recognizes that a successful reorganization will require the
4 hiring and retention of a skilled, productive, and well managed workforce. The Committee is
5 familiar with Mr. White's extensive experience and work history in the industry and views the
6 hiring of Mr. White as a necessary and wholly positive initial step in the reorganization process.

7 DATED this 28th day of September, 2016.

8 MILLER NASH GRAHAM & DUNN LLP

9
10 /s/ Mark D. Northrup

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15 Attorneys for the Official Unsecured Creditors'
16 Committee