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Honorable Christopher M. Alston
Chapter 11 Proceeding

4 Attorneys for Luc Martini

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8 UNITED STATES BANKRUPTCY COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10
11 In re:

Case No. 16-11767-CMA

12 NORTHWEST TERRITORIAL MINT, LLC,
13 Debtor.

**APPLICATION FOR ORDER
AUTHORIZING LUC MARTINI TO
CONDUCT RULE 2004 EXAMS**

14 LUC MARTINI, CREDITOR, by and through his legal counsel, hereby moves this
15 Court, on an *ex parte* basis, for an order authorizing Mr. Martini to conduct one or more
16 Bankruptcy Rule 2004 Exam(s) in connection with this case. In support thereof, Mr. Martini
17 states as follows:
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19 1. Mr. Martini is a creditor and party in interest. On information or belief, the
20 estate has in its possession and control at least 14,000 ounces of silver purchased by Mr.
21 Martini, or the proceeds thereof. Mr. Martini has a claim against the Debtor in the amount of
22 at least \$22,000.00 arising from his purchase of silver held by the Debtor, and/or his
23 subsequent lease of some or all of such silver to the Debtor. Mr. Martini has reason to believe
24 that the following parties and/or entities have information and/or documentation that may be
25 relevant to Mr. Martini's claim(s) in this case: the Debtor herein; Managing Member and
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APPLICATION FOR ORDER AUTHORIZING LUC MARTINI TO
CONDUCT RULE 2004 EXAMS - 1

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1 CEO of the Debtor *Ross Hansen*; employees of the Debtor *Diane Erdmann, Greg Fullington,*
2 *Jeff Goodfellow, Erin Robinson, Jim Rodger, Don Ruth,* and *Amelia Swan*; subsidiaries of the
3 Debtor *Medallic Art Company, Graco Industries,* and *The Honolulu Mint*; 50% owner of
4 *Medallic Art Company Dick Bressler*; and trustee in this case *Mark Calvert*.

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6 2. Under Bankruptcy Rule 2004, any party in interest may compel attendance at
7 an examination and/or production of documents discovery by any parties or entities regarding
8 matter(s) that are relevant to the bankruptcy case. Mr. Martini would like to conduct
9 examination(s) of, and or compel the production of documents by, one or more of the above-
10 named parties and/or entities at this time.

11 3. Mr. Martini's exam(s) of the above-named parties and/or entities will be
12 scheduled pursuant to subpoena(s) which will be issued pursuant to Bankruptcy Rule 9016.
13 Mr. Martini will provide at least 20 days prior written notice to each party and/or entity
14 involved of those Bankruptcy Rule 2004 Exam(s).

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16 WHEREFORE, Mr. Martini hereby prays for an order in this matter in the form of
17 the *Proposed Order* which is being submitted herewith.

18
19 Respectfully submitted this 16th day of March, 2017

20
21 By /s/ Joshua A. Rataezyk

22 Joshua A. Rataezyk, WSBA #33046
23 Amit Ranade, WSBA # 34878
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